

London Borough of Merton draft Estates Local Plan

Section 1 Eastfields Extract of the London Borough of Merton
draft Estates Local Plan.

London Borough of Merton

October 2016



Contents

Section 1:

Eastfields Extract of the London Borough of Merton draft Estates
Local Plan

Section 2:

High Path Extract of the London Borough of Merton draft Estates
Local Plan

Section 3:

Ravensbury Extract of the London Borough of Merton draft Estates
Local Plan

Section 4:

Statutory responses to the London Borough of Merton draft Estates
Local Plan

Eastfields extract of the London Borough of Merton draft Estates Local Plan

Stage 2 Consultation 1st February 2016 – 18th March 2016

London Borough of Merton

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1 Introduction

- 1.1. A consultation took place between 1st February and 18th March 2016 on the London Borough of Merton's Draft Estates Local Plan. 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.
- 1.2. This document summarises the responses that were received on the Eastfields estate. The consultation documents and all responses received (minus personal details) can be found on Merton Council's website www.merton.gov.uk/estatesplan

2 The vision for Eastfields

- 2.1. The vision is to create a Contemporary Compact Neighbourhood which recognises the existing estate's experimental design whilst also maintaining a distinctive character through the creation of a contemporary architectural style. It proposed encompassing a variety of types, sizes and heights for new homes overlooking traditional streets and the improvement of links to the surrounding area.

3 Consultation responses received

- 3.1. The Eastfields estate consists of 465 dwellings. Altogether 86 responses were received from people living on and around Eastfields, statutory consultees, residents groups, businesses and others. These responses were received in a wide variety of ways: letters, emails, questionnaires and online surveys. Those who wrote letters and emails to the council outlining their opinions on the Draft Estates Plan but did not fill out a questionnaire or online survey specifically stating a preference for regeneration are included in the qualitative analysis section of this report. For the purpose of quantitative analysis, any response that did not specifically answer a question has been recorded as 'no response'; for example, where respondents provided a narrative but did not tick a box selecting a particular preference. Similarly where questions in the questionnaire and survey were left blank, entries have been recorded as giving 'no response' for that particular question.
- 3.2. All responses, including those of the statutory consultees (Greater London Authority, Environment Agency, Sport England, Historic England) National Grid and Circle Housing Merton Priory are available online via www.merton.gov.uk/estatesplan.

4 Who responded to the consultation

- 4.1. The estates are geographically separate and most respondents commented on just one neighbourhood. 86 responses were received that related directly to the Eastfields section of Merton's Estates Local Plan. Of these, 73 were from people living within Eastfields estate. These include Resident Leaseholders, Resident Freeholders, Circle Tenants, and Private Tenants.
- 4.2. In the questionnaire respondents were asked to indicate which category best described their tenure. Table 1 and Figure 1 show the breakdown of respondents according to their tenure. This

has been used to see if the proportion of responses received was representative of the existing estate. 48% of the responses received were from resident leaseholders and resident freeholders, who make up 46% of the tenure split on the estate. 34% of the responses received were from Circle Tenants who make up 54% of the tenure split. The remaining 18% of responses received were from other groups (Statutory Organisations, Private Tenants on the estate, Respondents outside of the estate, Absent Landlords and those who gave no response to this question).

Eastfields respondents	Responses	Proportion
Resident Leaseholder on estate	6	7%
Resident Freeholder estate	35	41%
Circle Tenant	29	34%
Statutory Organisation	2	2%
Private Tenant on estate	3	3%
Respondent Outside Estate	4	5%
Business Owner	1	1%
Unknown	6	7%
Total	86	100%

Table 1 Tenure of all Eastfields respondents

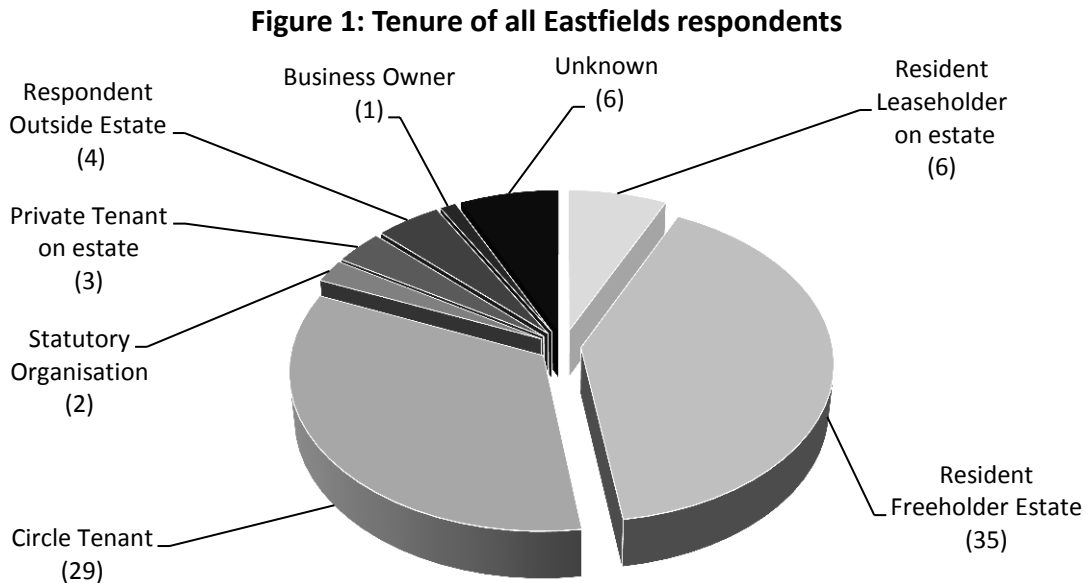


Figure 1: Tenure of all Eastfields respondents

5 Question 1: Preference for regeneration

5.1. The first question on the questionnaire asked respondents for their preference for regeneration.

The question asked was:

5.2. Having read and considered the council's draft Estates Local Plan and supporting documents please indicate your preference at this stage for regeneration from the following options:

5.2.1. Option 1: Demolish and redevelop the entire Estate

Redeveloping the whole estate would mean demolishing and replacing the existing buildings and replacing the existing buildings to provide well-designed energy efficient new homes and general improvement to the neighbourhood, including connections to the surrounding areas.

5.2.2. Option 2: Partial redevelopment

Retain some buildings and redevelop the majority of the estate to provide a number of benefits, such as well-designed energy efficient new homes but with fewer benefits to the neighbourhood.

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

Refurbish all Circle Housing Merton Priory and leasehold properties to ensure they meet current minimum housing standards and have reasonable kitchens, bathrooms, windows, wiring and insulation. All leaseholders would have to share the costs of this work. This would not include changes to the outside areas.

5.3. 76 of the 86 responses provided an indication of preference for regeneration, and 10 gave no response. The graph in Figure 2 below shows the preference for regeneration given by all respondents.

Figure 2: All respondents - views on regeneration

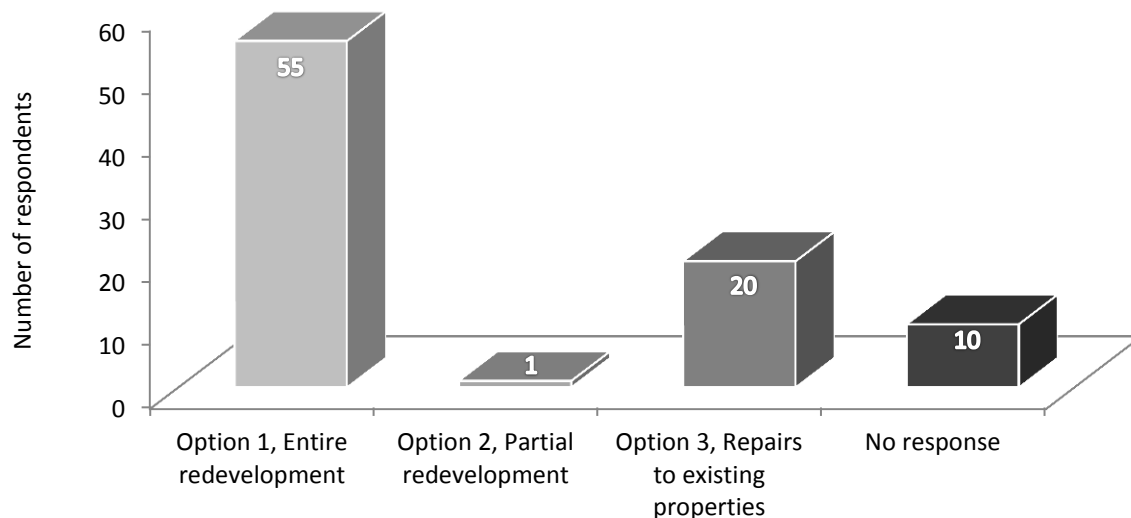


Figure 2: All respondents – views on regeneration

5.4. Figure 2 shows the preference for regeneration from all responses, including the views of statutory organisations and other respondents outside the estate. Of the two responses received from statutory organisations, neither gave a preference for regeneration and they have been recorded as giving no response to this question. Of the four respondents from outside the estate three gave preference for entire redevelopment and the other gave no response to this question. The one respondent who was a business owner gave preference for investment in existing properties.

5.5. The responses received from residents living in the estate – and therefore directly affected by the proposals – have been separated out in Figure 3 below. Given that 95% of the responses received were from residents on the estate, Figure 3 shows a similar pattern to the preferences of all respondents including those from outside the estate shown in Figure 2.

Figure 3: Residents living within Eastfields - views on regeneration

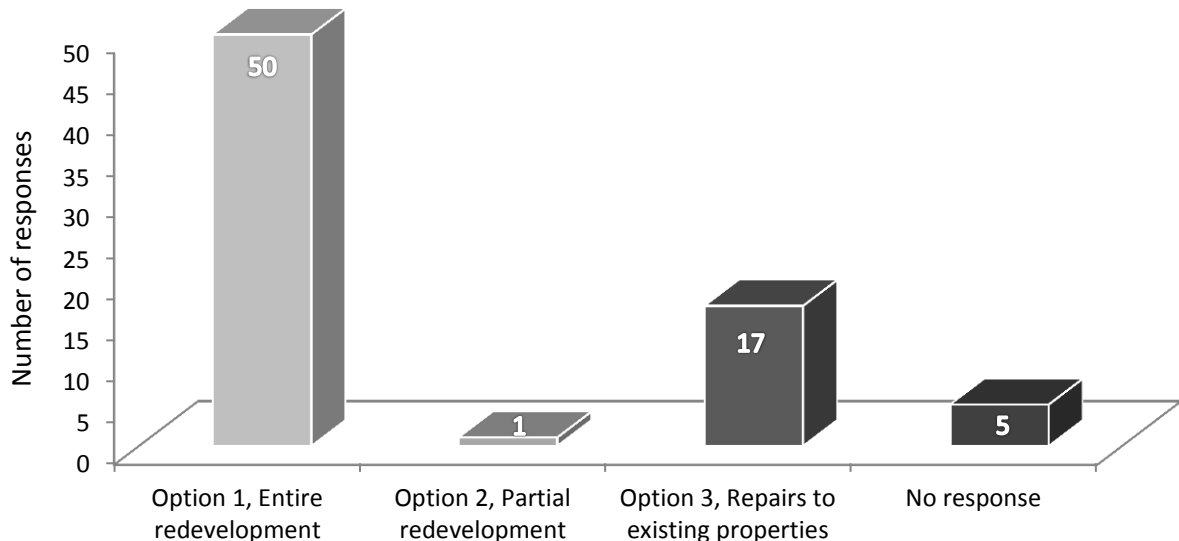


Figure 3: Residents living within Eastfields – views on regeneration

5.6. This shows that there is appetite for regeneration of the entire estate. More than twice as many respondents preferred entire redevelopment over repairing existing properties.

5.7. A more detailed breakdown of the preferences for regeneration received from each tenure group can be found in Table 2 below.

	Option 1 Entire redevelopment	Option 2 Partial redevelopment	Option 3 Repairs to existing	No response	Total
Resident Leaseholder on estate	4	0	2	0	6
Resident Freeholder on estate	21	1	11	2	35
Circle Tenant	23	0	3	3	29
Statutory Organisation	0	0	0	2	2
Unknown	2	0	2	2	6
Private Tenant on estate	2	0	1	0	3
Respondent Outside Estate	3	0	0	1	4
Business Owner	0	0	1	0	1
Total	55	1	20	10	86

Table 2: All tenures: views on regeneration

5.8. Table 2 shows that:

- Of the 6 Resident Leaseholders who responded, twice as many chose Entire redevelopment (Option 1) as chose Repairs to existing (Option 3). None chose Partial redevelopment (Option 2).
- Of the Resident Freeholders 21 chose Entire redevelopment (Option 1), this is almost twice as many as chose Repairs to existing properties (Option 3). Only 1 chose Partial redevelopment (Option 2).
- Circle Tenants gave the greatest support for Entire redevelopment (Option 1), with 23 of them choosing this compared to the 3 that chose Repairs to existing properties (Option 3).
- Of the 3 Private Tenants, 2 chose Entire redevelopment (Option 1) and 1 chose Repairs to existing properties (Option 3).

This information is depicted in the graph in Figure 4, shown below.

Figure 4: All respondents - views on regeneration

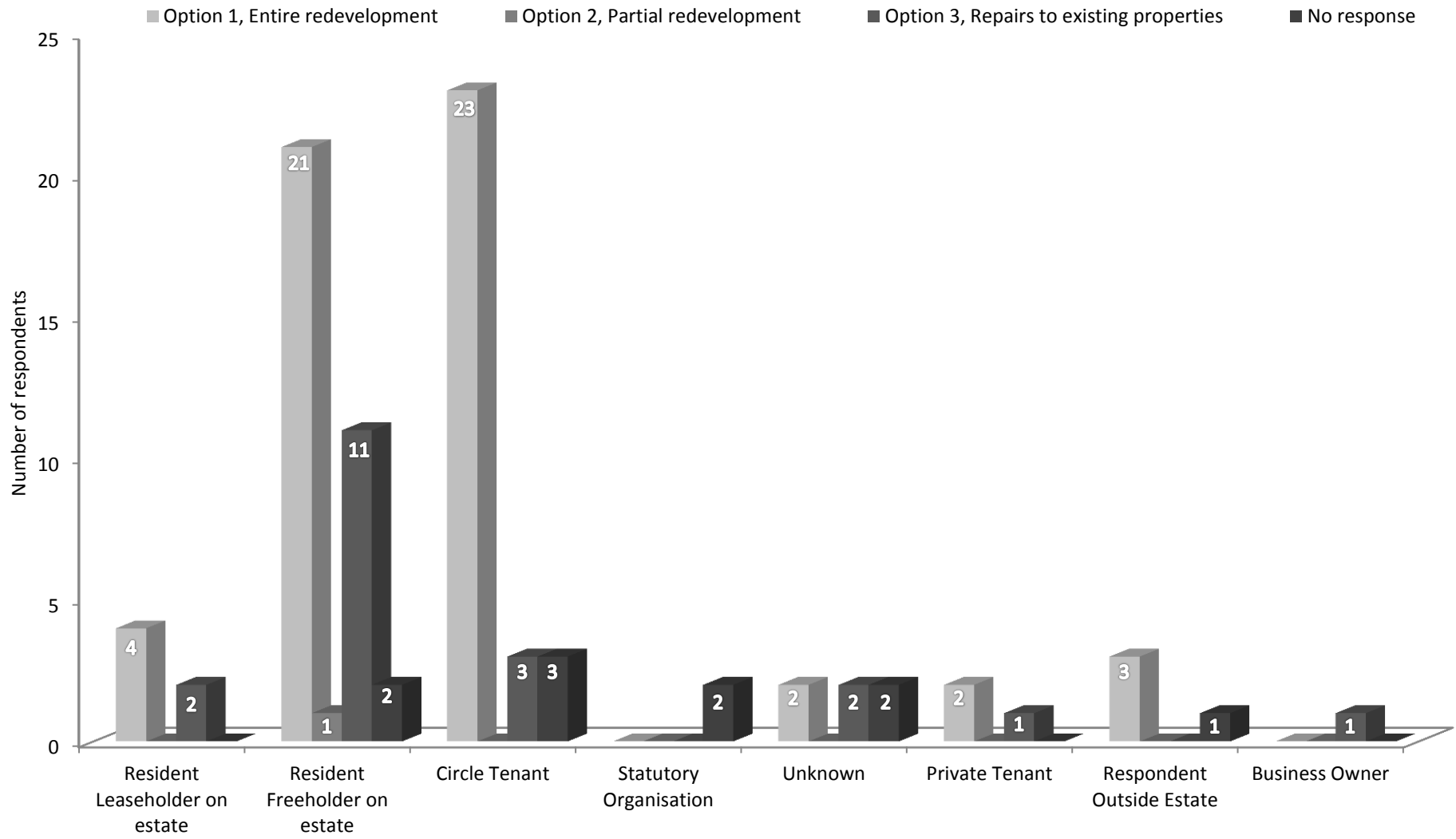


Figure 4: All respondents – views on regeneration

6 Respondents were then asked for their opinion on specific policies within the draft Estates Local Plan. The question asked was:

6.1. 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:

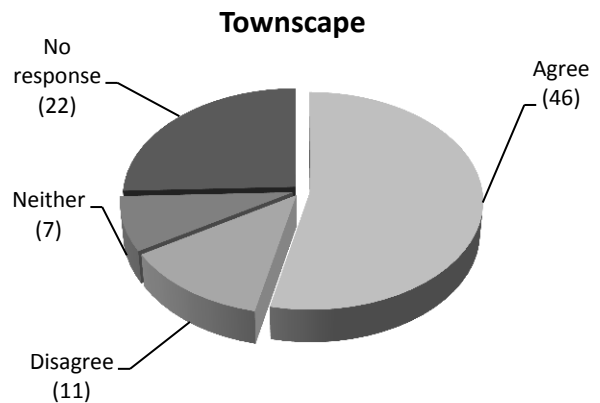
6.2. For each topic area respondents chose whether they strongly agree, agree, strongly disagree, disagree, and neither agree or disagree. For the purposes of this analysis ‘strongly agree’ and ‘agree’ have been combined as ‘agree’, and the same for ‘strongly disagree’ and ‘disagree’. When respondents did not specifically answer this question, this has been recorded as giving ‘no response’ to that particular question. The exact responses in agreement and disagreement for each topic area are listed in detail in the tables and figures below.

6.3. Many, but not all, respondents to the council’s Stage 2 consultation wrote comments as part of their responses. A summary of these comments are available below; this summary does not include responses from the statutory consultees or Circle Housing Merton Priory.

6.4. These comments have been summarised between people who live within Eastfields and respondents who live outside the estate. In general, the comments highlight similar themes regardless of whether respondents live in or beyond Eastfields.

6.5. Townscape: How buildings and spaces should be arranged and their general character.

Townscape	Agree/Disagree	%
Agree	46	53%
Disagree	11	13%
Neither	7	8%
No Response	22	26%
Total	86	100%



6.5.1. Responses from residents of Eastfields

- Proposal seems to be to build on open space and create estate with no privacy and bigger car parking problems.
- Like the design of the new town houses.

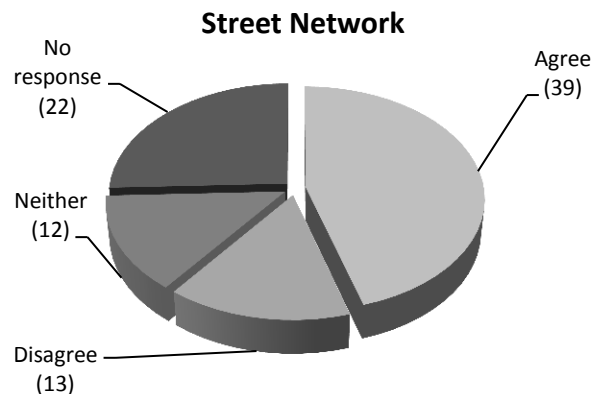
- Property fronts facing onto open green - ideal for young families and child safety. Narrow entrances to the interior open space make it more private and enclosed.
- Generally disagrees
- Like that the houses are closer to the railway station
- Biased opinion presented as fact - strongly disagrees
- View to the cemetery is not a strong selling point.
- New homes should reflect modernity, not cramped high rise (2.45)
- Houses should be at the front where possible to create a residential atmosphere
- Build using strong weather-proof materials; solid roofs instead of flat roofs
- External materials should be used that do not hold onto green algae which spoils the external fascia of the building
- Construct new buildings in relation to what is around traditionally; do not use poor materials as trials
- Traditional streets and brick houses with pitched roofs not flat roofs - such homes require less maintenance.

6.5.2. Outside estate

- Property fronts facing onto open green - ideal for young families and child safety. Narrow entrances to the interior open space make it more private and enclosed.

6.6. **Street Network:** The arrangement and layout of streets and what they should look and feel like.

Street Network	Agree/Disagree	%
Agree	39	45%
Disagree	13	15%
Neither	12	14%
No Response	22	26%
Total	86	100%



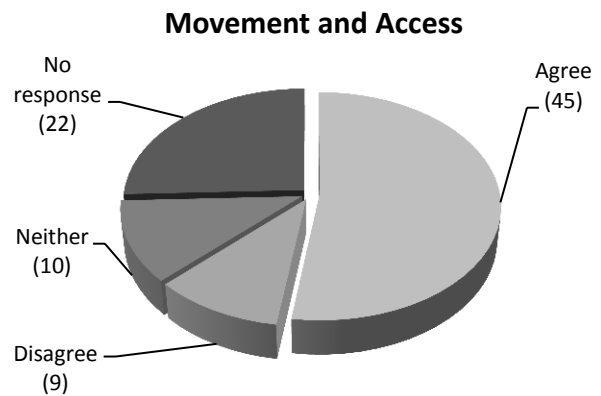
6.6.1. Responses from residents of Eastfields

- Like the street design, parking, open space and roads.
- Need more car park space.
- Strongly disagree. Arcadia and Mulholland Close should not be a main through road - child safety concerns.
- The current roads are in a very poor state.

- Disagree. Concerns raised that new roads will create cut throughs by motorists avoiding the existing level crossing and roundabout. Also thought that this would end up being a cut through / racetrack to Woodstock Way.
- Thinks that the current layout is a warren and creates hidden and unsafe areas which need to be more visible, well-lit and accessible to users. Drivers should be able to have easy access to different streets.
- Streets should be user friendly - wide enough, well-lit and clearly sign posted at a height that enables visibility.
- Speed limits must apply to cater for children and families with children.

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

Movement and access	Agree/Disagree	%
Agree	45	52%
Disagree	9	10%
Neither	10	12%
No Response	22	26%
Total	86	100%



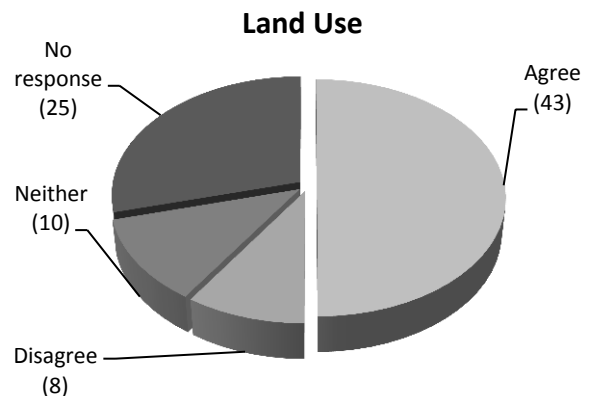
6.7.1. Responses from residents of Eastfields

- Barrier was put in Clay Ave to stop youngsters speeding. If speed humps were put at other side of barrier then barrier could be removed for greater access Tamworth – Woodstock.
- P.60 (a) improved junction will be required Acacia Road / Tamworth Lane for the through road as junction busy already. Strongly agree.
- Please consider parking for each flat - strongly agree with movement and access
- Concerns re: road route between Woodstock Way & Tamworth Lane - rat-run, congestion and 'race-track' issues.
- A new bus service on the estate would cause too much noise. If the walls are sound-proofed that's OK. If not, the bus service should remain on the main road.
- Through road between Acacia Road and Woodstock Way is central to CHMP plans despite public opposition. It appears that LBM are now supporting this proposal.
- Do not make Clay Ave a through road – increased traffic and anti-social behaviour.
- If road proposal goes ahead traffic lights would be needed at intersection of Acacia Rd & Tamworth Lane.

- Would like more bus stops for the elderly and disabled and bus gates at entrance at Acacia Road.
- Parking currently an issue with some residents parking in front of other resident's garage.
- Visitor and residents permits would stop the commuter parking during the week and people coming to do mechanical work at weekends.
- Concerns over through road becoming busy and temptation to use as a rat run.
- We all talk about the utopia of getting people off the cars into bikes. The reality is that while many people are taking to bikes, majority households own 2 or more cars. Suggests underground parking.
- New bus services should be introduced on existing main roads, not to the estate due to congestion, noise issues.

6.8. **Land use:** Suitable land uses for each neighbourhood.

Land use	Agree/Disagree	%
Agree	43	50%
Disagree	8	9%
Neither	10	12%
No Response	25	29%
Total	86	100%



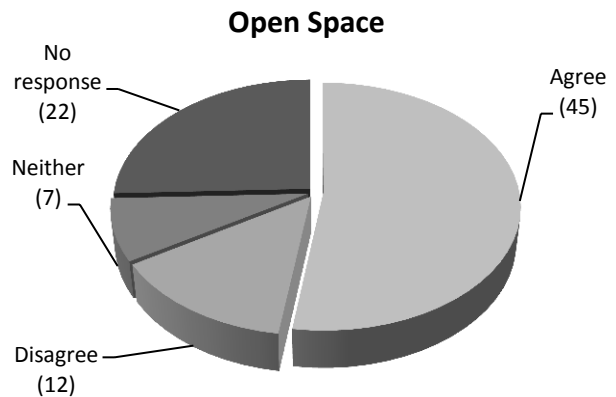
6.8.1. **Responses from residents of Eastfields**

- Strongly agree - build flats for disabled people.
- Estate won awards when it was first built for minimising building envelope while providing 3-bed house with garden. Not fortress: feels safe and private for residents. Council not recognising that these are people's homes.
- Need more car parking spaces.
- Removal of garages will lead to street parking issues.
- Flats should be in the middle with houses surrounding the estate.
- Suggestion to use Y Cube development as example of affordable housing.
- Concerns over parking arrangements for tenants' vehicles - particularly in light of proposals to increase number of properties on the estate - and potential overflow of vehicles onto other roads / estates.
- Grove Road is not currently wide enough for parking - is this the proposed route for the 152 & 463 buses?

- A community space in a nice building is needed for community groups. Young people can be prisoners of the postcode and can't venture far. Shops would be a good opportunity for small business development - not fast food. Parking is an issue during events (BMX). Gate to cemetery would result in more trouble.
- Unfortunately there is no detail as to how Merton Council and TfL will work together on the issues identified on page 48 of the plan.
- Freeholder properties should be separate from tenant residents.
- Concerned about increased density – increasing the number of homes to over 620 will create a new ghetto caused by parking issues as we have seen in many estates in Mitcham.
- Wheeler bins and garage parking with driveway.

6.9. Open space: The location and type of spaces that should be provided for each neighbourhood.

Open space	Agree/Disagree	%
Agree	45	52%
Disagree	12	14%
Neither	7	8%
No Response	22	26%
Total	86	100%



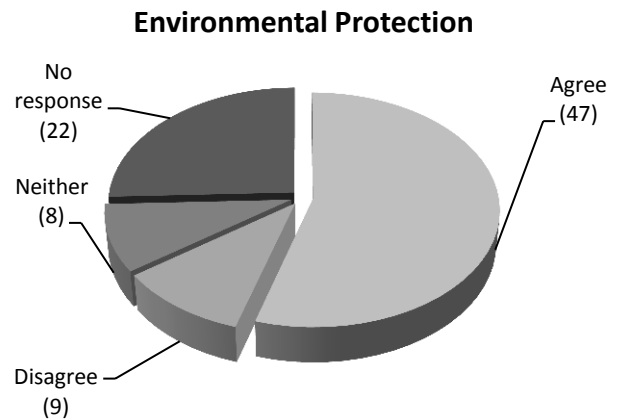
6.9.1. Responses from residents of Eastfields

- Children's activities, safety, wildlife protection.
- If houses built around edge of St Mark's Academy some green space could be given to High Path Estate where green space needed. (P.174, para 5.8)
- Green space within estate currently well used in summer by children playing and adults relaxing. Gates leading to greens only put there by council & Circle. Proposal seems to be to build on open space and create estate with no privacy and bigger car parking problems.
- New green land would be a nice aspect to the new area.
- Agree – children's park is very important.
- Green space proposals aren't practical.
- I chose to move to Eastfields, as a freeholder, because of the open spaces currently around my property, which give a light, open feel. I am extremely disappointed that, if re-generation goes ahead, these spaces will disappear, leaving properties much closer together.

- The proposal to have possibly one large open space with smaller spaces conflicts with the suggestion of building higher blocks in large open spaces - There is only one such space identified.
- Does not like losing the open space we have.

6.10. **Environmental protection:** How to maximise opportunities for biodiversity and prevent flooding.

Environmental protection	Agree/Disagree	%
Agree	47	55%
Disagree	9	10%
Neither	8	9%
No Response	22	26%
Total	86	100%

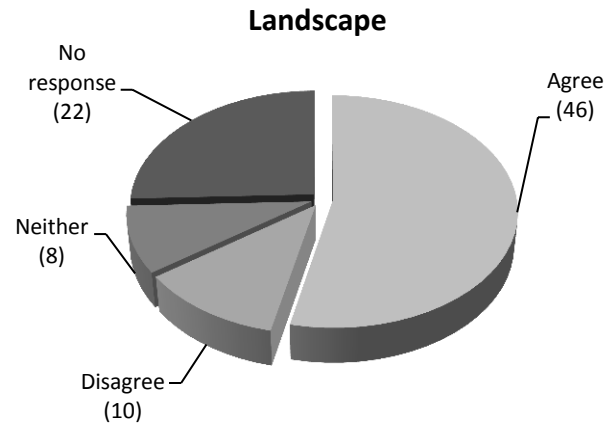


6.10.1. Responses from residents of Eastfields

- Strongly agree with use of solar power.
- Keen to see new builds and new places for wildlife to come into the area.
- Strongly agree - please pay attention to the energy consumption. Home heating and hot water is very important.
- Small waste storage in or outside flat is better than specifying places in all buildings for rubbish.

6.11. **Landscape:** How each neighbourhood can use and building upon existing landscape assets to create high quality places.

Landscape	Agree/Disagree	%
Agree	46	53%
Disagree	10	12%
Neither	8	9%
No Response	22	26%
Total	86	100%

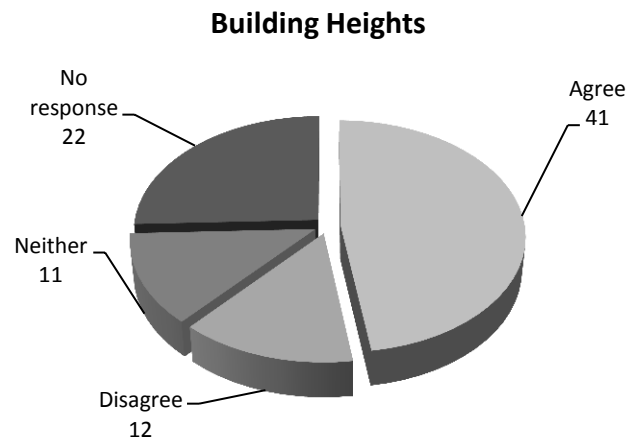


6.11.1. Responses from residents of Eastfields

- Increased number of trees will mitigate against flooding.
- Concerns with differentiation between areas considered Areas of Poor or Good Landscape Value.
- Recognition that hedges could make more of a positive contribution to the landscape.
- Considers that there are very few existing trees shown on the plan and this needs to be rectified. Argues that there should be a presumption for existing trees in the plan to be retained, not just central green space (para 3.47/p 56).
- To retain trees and hedgerows (para 3.48/ p56).
- Visual connectivity should also include schools (p59).
- Further justification needed to ensure that the trees on or adjoining the boundary remain undamaged (p60).
- For trees to be a feature on residential streets and for trees and hedges to act as boundaries if car parking on front gardens is proposed (Policy EP E2).
- Replace the word 'penetrate' to 'approach' (Policy EP E3/ p62). Add an additional item 'to aim for the re-development to accommodate green corridors to link off-site spaces.
- Part a) and para 3.75 need clarification (EP E5/ p66).
- Suggests for the plan to allocate swale and green links not within the site (Policy E5/ p67).
- Suggest for SUDS to include paving (policy Ep E6/ p68).
- Suggest the following for part g) 'Should require all existing trees to be retained wherever possible to encourage a mature landscape at the earliest time (Policy EP E7/p70).
- Replace 'scrub vegetation' with 'shrubby vegetation' (part 3.84).
- Suggests for trees to be planted on the estate to prevent flooding.

6.12. **Building heights:** Appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area.

Building heights	Agree/Disagree	%
Agree	41	48%
Disagree	12	14%
Neither	11	13%
No Response	22	26%
Total	86	100%



6.12.1. Responses from residents of Eastfields

- Don't have tall buildings.
- Do not make buildings high - blocking of light and creates frightening aspect. Buildings much taller than others could produce disharmony - 'us and them attitude'.
- I agree that building heights should be to a minimum and welcome the council's view of 2 - maximum 4 stories. I do not accept the suggestion of having anything higher e.g. 5 or 6 stories as this would block much needed sunlight and views and leave some areas too dark and appear crowded.
- I am also opposed to the height of the building if it goes over 4 storeys as CHMP are proposing 7 storeys towards the banks of Acacia road.

7 Response to Policies

7.1. The table below summarises the results of respondents' opinions of specific policies within the draft Estates local plan.

Policy	Townscape	Street Network	Movement and Access	Land Use	Open Space	Environmental Protection	Landscape	Building Heights
Number who agree	46 (53%)	39 (45%)	45 (52%)	43 (50%)	45 (52%)	47 (55%)	46 (53%)	41 (48%)
Number who disagree	11 (13%)	13 (15%)	9 (10%)	8 (9%)	12 (14%)	9 (10%)	10 (12%)	12 (14%)

Table 3: Number and proportion of respondents who either agree or disagree with specific policies

7.2. The response to the policies shows that 50% or more of respondents agreed with 6 of the 8 policies.

7.3. More respondents agreed than disagreed with the policies by a factor of 3 to 5.

7.4. The non-response rate was approximately 25% across the policies.

8 Other matters

The following points were raised by respondents during the consultation and relate to the regeneration and its delivery, but not to specific policies in the consultation document.

- Anxious that future development overlooking their property may exceed the existing height level. For this reason, they would prefer for 2 storeys being built to the rear of their property rather than flats.
- Supports the regeneration of the estate, due to their perceived poor condition.
- Does not support the regeneration of the estate.
- Provides a comparison between the borough and the ward for various crime types for Feb 2016. This shows that violence and anti-social behaviours is at a greater rate for this ward when compared with the rest of the borough.
- Suggests that item 3.24 - the last sentence needs correction.
- Considers that the choice of colours on pg50 is odd. Preference would be for the amenity/green space to be in shades of green and for pedestrianised areas/ parking courts to be orange.
- Concerned that the plan is not objective - page 52.
- Puts forward proposals as to where the first phase of development should take place.
- Should be quick as possible, been kept in limbo for too long.
- Agrees with plans. Wants a better timeline on when will be completed.
- Not residents fault that £ received from property sale was not reinvested. Eastfields station worth waiting for. Area now more appealing to prospective homeowners but makes it impossible / unaffordable for people currently living on the estate to buy a similar home nearby.
- Unflattering description of the estate is unjust. As current dwellings are 50 years old some update would be advantageous. Do not see how you can justify demolition of privately owned properties.
- Don't agree with CHMPs plans for Thrupp Close to be last phase.
- When will it start? Was told 2016 but heard nothing since.
- When will it start?
- Great. A big improvement on look of the area and huge advantages for people living on Eastfields. Give us something to look forward to.
- Don't understand draft plan. [see Circle matters summary] Can't figure out how estate will be laid out.
- Homes not defective. Do not agree with demolition. No increase in property value due to demolition proposals. Estate agents will not value homes. Would not have bought home if knew it would only last 50 years.
- If you build where the car parks are where will people park their cars?
- If buildings created along Tamworth Lane this would cause a problem if ever a road bridge replaced the level crossing.
- CCTV very important. Elevator for each +3 storey building important; flats need private not communal mailboxes.

- It would be great if you could say a bit more about CCTV for the area.
- Fully support Eastfields regeneration. Currently living in a poorly build 1 bed flat. Flat constantly freezing, mould, damp condensation, leaks, bad heating system, poorly insulated. Spend most of money on heating to prevent toddler son getting ill again with chest infections. Hurry up so son can live in a home that doesn't make him ill.
- Unflattering description of the estate is unjust. As current dwellings are ~50 years old some update would be advantageous. Do not see how you can justify demolition of privately owned properties.
- Design comment: enclosed kitchens not open plan.
- Not clear what happens to residents whilst works are undertaken.
- Waiting for three years for regeneration plans is wearing residents down. Decisions need to be made providing residents with simple explanations not complex terms.
- Respondent against site being wedged between school and railway line. LBM Clay Avenue Character Study highlighted as positive example of addressing similar issues.
- As CHMP not providing full values presume LBM will meet any shortfall in property values - i.e. values not added in last 2.5 years. Property deed does not state 50 year duration - property sold under false pretences. Homes not defective so no need for a complete demolition.
- Against regeneration - good neighbours and no wish to be relocated.
- New area will be a happier place for all.
- St Mark's Academy proposals not supported.
- Where will residents stay during the building works? How long will it take for replacement buildings? Has compensation package for homeowners been aged upon? What back up plans do the Council and Circle have?
- Over ambitious project; no faith in promises made to residents by Circle; Option to demolish and rebuild not supported.
- Does not want regeneration to go ahead.
- Does not support the demolition of home and feels will be forced out of London. Estate should be left as is or redo the houses that are not up to standard. Homeowners who have resided on the estate for a long time are being forced out and having their homes taken from them and are unable to purchase a new home locally.
- Thinks the council should invest in the current homes to bring them up to date instead of demolishing them.
- Refurbish the estate as they are doing at Pollards Hill. CHMP just want to make money and don't have residents' best interests at all.
- Like for like offer for Freeholders including where we want to live and no 11yrs offered by circle housing we should be able to pass offer onto our children if we pass away we want a fair deal.
- Are any of the houses going to be for sale on open market?
- Firmly believe that the estate needs rebuilding as several aspects of the internal and external construct are outdated, problematic and a source of repeated cost to the organisations running it and to the freeholders.

- The 10 - 15 year time frame to complete the build is far too long and need to be reduced as this is unacceptable to expect residents to wait that long before moving into a new home especially those who are at the tail end of the regeneration process. I do not wish to see yet another new build where crime becomes part and parcel of the estate, build to high quality so that residents can hold up the standards.
- More meetings with affected residents and tenants. Planned visits outside of Saturdays to view similar projects so that those who were unable to attend/visit during earlier offers would be better informed. These visits should be spread out to give ample choice for visits not just Tuesday or Saturdays as offered by Merton Priory. There is too much delay in the process - lots of information and activity, then nothing for months then suddenly action. There is too long a gap in between information and activity. E.g. why is the council only just putting their views across when most people have taken decisions on whether to stay or leave?
- As a freeholder do not agree with the 11 years tapering off, would consider a 5 year tapering off period.
- Keep the existing buildings but improve its roof and drainage.
- Improve what we have, don't demolish.
- When will the demolishing start and what will happen to the people that has freehold? What kind of help will they get? Also, Where will they live whilst the demolishing start?
- The draft estate plan looks very good as so much hard work has gone into it. I think demolishing the existing structures and building new homes is a huge price but would be worth it at the end. I noted that there have been talks about suitable piece of land nearby to build where residents of Eastfields could move into to allow demolition. Yes, there does need to keep the homogeneity of the existing community but CHMP should consider moving people temporarily with the option to move them back when the building are completed. It is inconveniencing but that is something that could be considered and the buybacks are very good vehicles for this.
- Leave St Marks School out of it.
- It looks good on paper. But what will happen to local amenities, tenants and lease holders during regeneration work?
- The sooner regeneration starts at Eastfields the better.

9 Consultation matters

- Would like free use of possible Wi-Fi hotspots for residents.
- Suggests for each new residential property on the estate to have high quality terrestrial TV aerial and satellite connection.
- Requires a 'Secure Door Lock and Door Entry', double glazed windows, secure skirting board for new residential properties.
- Preference to stay in Mitcham, followed by Colliers Wood.
- Prefers for gates not be put near Mitcham Eastfields Cemetery.
- Requests bus stops specifically for people that are less able to travel.

High Path extract of the London Borough of Merton draft Estates Local Plan

Stage 2 Consultation 1st February 2016 – 18th March 2016

London Borough of Merton

October 2016



1 Introduction

- 1.1. A consultation took place between 1st February and 18th March 2016 on the London Borough of Merton's Draft Estates Local Plan. 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.
- 1.2. This document summarises the responses that were received on the High Path estate. The consultation documents and all responses received (minus personal details) can be found on Merton Council's website www.merton.gov.uk/estatesplan.

2 The vision for High Path

- 2.1. The draft plan's vision for the High Path estate was to create a new London Vernacular with traditional streets and improved links with its surroundings. It proposed that buildings would be consistent in design, based on traditional terraced streets, front doors onto streets, access to quality amenity space, the use of brick, and good internal design. The idea was to use the land efficiently, make the most of good transport services and support the existing local economy.

3 Consultation responses received

- 3.1. The High Path estate consists of 608 dwellings. Altogether 106 responses were received from people living on and around High Path, statutory consultees, residents groups, businesses and others. These responses were received in a wide variety of ways: letters, emails, questionnaires and online surveys. Those who wrote letters and emails to the council outlining their opinions on the Draft Estates Plan but did not fill out a questionnaire or online survey specifically stating a preference for regeneration are included in the qualitative analysis section of this report. For the purpose of quantitative analysis, any response that did not specifically answer a question has been recorded as 'no response'; for example, where respondents provided a narrative but did not tick a box selecting a particular preference. Similarly where questions in the questionnaire and survey were left blank, entries have been recorded as giving 'no response' for that particular question.
- 3.2. All responses, including those of the statutory consultees (Greater London Authority, Environment Agency, Sport England, Historic England) National Grid and Circle Housing Merton Priory are available online via www.merton.gov.uk/estatesplan.

4 Who responded to the consultation

- 4.1. The estates are geographically separate and most respondents commented on just one neighbourhood. 106 responses were received that related directly to the High Path section of Merton's Estates Local Plan. Of these, 92 were from people living within High Path estate. These include Resident Leaseholders, Resident Freeholders, Circle Tenants, and Private Tenants.
- 4.2. In the questionnaire respondents were asked to indicate which category best described their tenure. Table 1 and Figure 1 show the breakdown of respondents according to their tenure. This

has been used to see if the proportion of responses received was representative of the existing estate. 44% of the responses received were from resident leaseholders and resident freeholders, who make up 41% of the tenure split on the estate. 37% of the responses received were from Circle Tenants who make up 59% of the tenure split. The remaining 21% of responses received were from other groups (Statutory Organisations, Private Tenants on the estate, Respondents outside of the estate, Absent Landlords and those who gave no response to this question).

High Path respondents	Number of responses	Proportion
Resident Leaseholder on estate	21	20%
Resident Freeholder on estate	25	24%
Circle Tenant	39	37%
Statutory Organisation	2	2%
Private Tenant on estate	7	7%
Respondent Outside Estate	5	5%
Absent Landlord	3	3%
Unknown	4	4%
Total	113	100%

Table 1: Tenure of all High Path respondents

Figure 1: Tenure of all High Path respondents

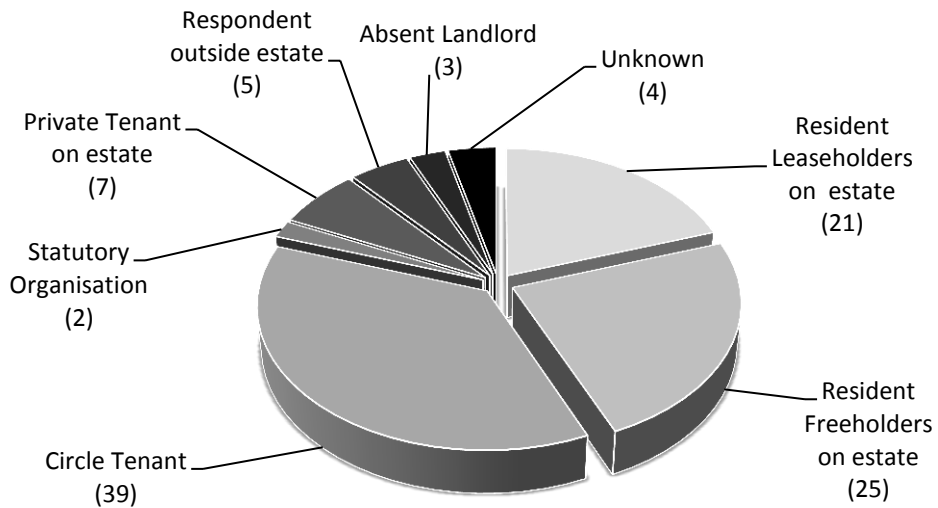


Figure 1: Tenure of all High Path respondents

5 Question 1: Preference for regeneration

5.1. The first question on the questionnaire asked respondents for their preference for regeneration.

The question asked was:

5.2. **Having read and considered the council's draft Estates Local Plan and supporting documents please indicate your preference at this stage for regeneration from the following options:**

5.2.1. Option 1: Demolish and redevelop the entire Estate

Redeveloping the whole estate would mean demolishing and replacing the existing buildings and replacing the existing buildings to provide well-designed energy efficient new homes and general improvement to the neighbourhood, including connections to the surrounding areas.

5.2.2. Option 2: Partial redevelopment

Retain some buildings and redevelop the majority of the estate to provide a number of benefits, such as well-designed energy efficient new homes but with fewer benefits to the neighbourhood.

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

Refurbish all Circle Housing Merton Priory and leasehold properties to ensure they meet current minimum housing standards and have reasonable kitchens, bathrooms, windows, wiring and insulation. All leaseholders would have to share the costs of this work. This would not include changes to the outside areas.

5.3. 101 of the 106 responses provided an indication of preference for regeneration, and 5 gave no response. The graph in Figure 2 below shows the preference for regeneration given by all respondents.

Figure 2: All respondents - views on regeneration

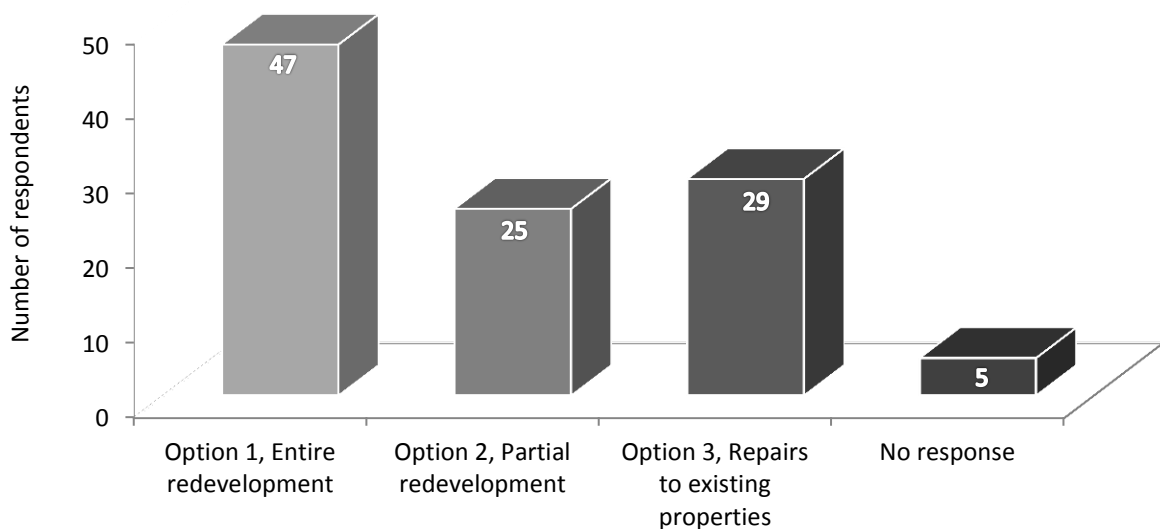


Figure 2: All respondents - views on Regeneration

5.4. Figure 2 shows the preference for regeneration from all responses, including the views of statutory organisations and other respondents outside the estate. Of the two responses received from statutory organisations, one gave a preference for entire redevelopment and the other gave no response to this question. Of the five respondents outside of the estate two preferred entire redevelopment, two preferred repairs to existing properties and one gave no response. Of the three absent landlords, two gave a preference for entire redevelopment and one gave preference for repairs to existing properties.

5.5. The responses received from residents living in the estate – and therefore directly affected by the proposals - have been separated out in Figure 3 below. Given that 92 of the 106 responses received were from residents on the estate, Figure 3 shows a similar pattern to the preferences of all respondents including those from outside the estate shown in Figure 2.

Figure 3: Residents living within High Path - views on regeneration

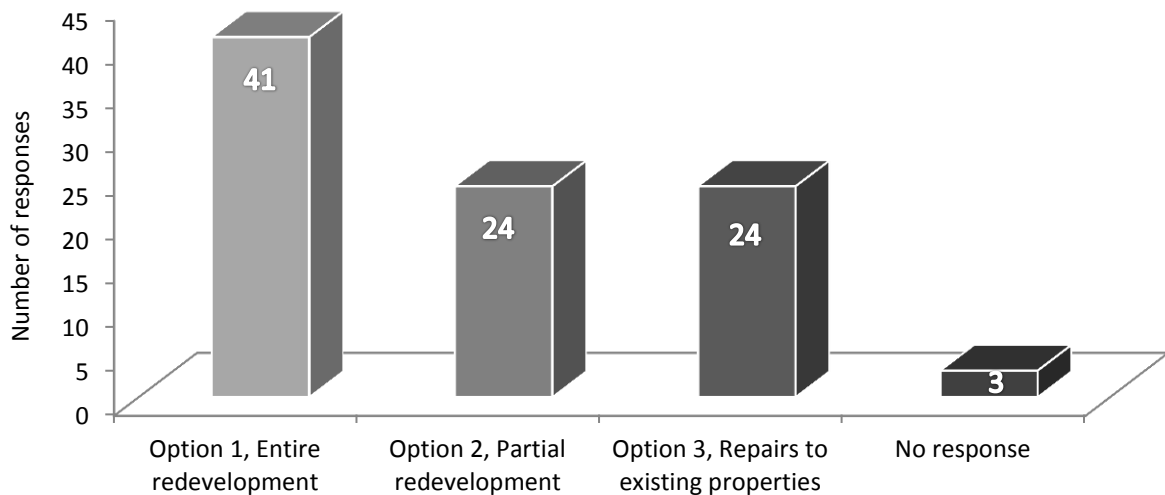


Figure 3: Residents living within High Path – views on regeneration

5.6. This shows that whilst there is appetite for regeneration of the entire Estate, about the same number of respondents prefer either partial redevelopment or repairs to existing properties.

5.7. A more detailed breakdown of the preferences for regeneration received from each tenure group can be found in Table 2 below.

Tenure	Option 1 Entire redevelopment	Option 2 Partial redevelopment	Option 3 Repairs to existing	No response	Total
Resident Leaseholder on estate	11	5	5	0	21
Resident Freeholder on estate	9	8	8	0	25
Circle Tenant	20	9	8	2	39
Statutory Organisation	1	0	0	1	2
Unknown	1	1	2	0	4
Private Tenant on estate	1	2	3	1	7
Respondent Outside Estate	2	0	2	1	5
Absent Landlord	2	0	1	0	3
Total	47	25	29	5	106

Table 2: All tenures: views on regeneration

5.8. Table 2 shows that:

- Of the 21 Resident Leaseholders who responded, just over twice as many chose Entire redevelopment (Option 1) as chose Partial (Options 2) or Repairs to existing properties (Option 3).
- Of the 25 Resident Freeholders who responded, the split was more even with 9 choosing Entire redevelopment (Option 1), 8 choosing Partial redevelopment (Option 2) and 8 choosing Repairs to existing properties (Option 3).
- The relative position of Circle Tenants was similar to Resident Leaseholders with just over twice as many choosing Entire redevelopment (Option 1) as chose Partial (Options 2) or Repairs to existing properties (Option 3).
- Circle Tenants were the highest represented group. 20 of the 39 chose Entire redevelopment (Option 1), 9 chose Partial Redevelopment (Option 2) and 8 chose repairs to existing properties (Option 3).
- Of the 7 Private Tenants, 3 chose repairs to existing properties (Option 3), 2 chose partial redevelopment (Option 2), and 1 chose entire redevelopment (Option 1).
- No respondents from outside the estate, Statutory Organisations or Absent Landlords chose partial redevelopment (Option 2).

This information is depicted in the graph in Figure 4, shown below.

Figure 4: All respondents - views on regeneration

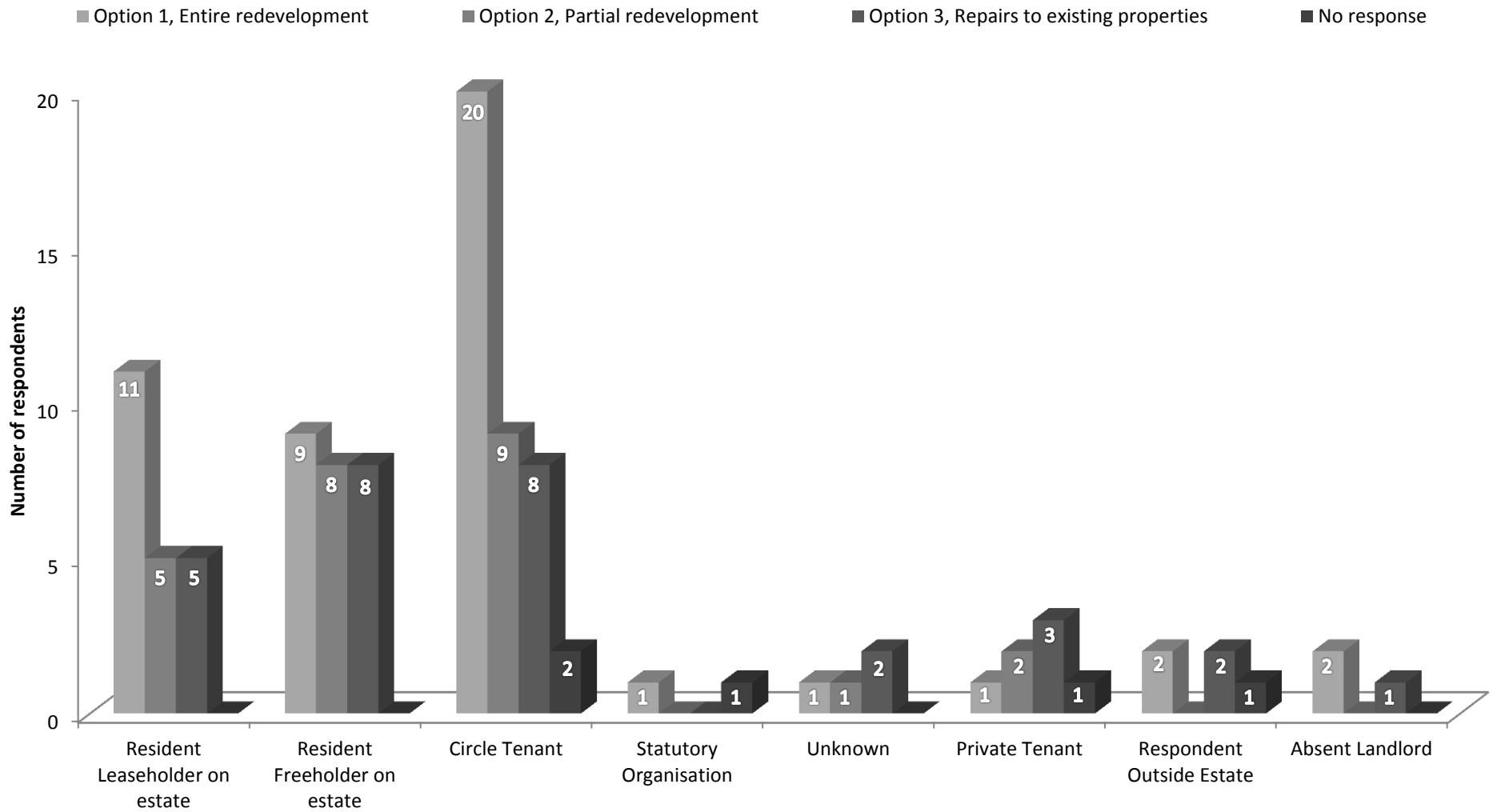


Figure 4: All respondents – views on regeneration

6 Respondents were then asked for their opinion on specific policies within the draft Estates Local Plan. The question asked was:

6.1. 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:

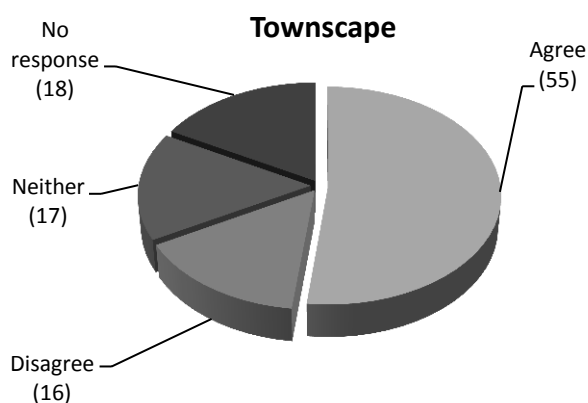
6.2. For each topic area respondents chose whether they strongly agree, agree, strongly disagree, disagree, and neither agree or disagree. For the purposes of this analysis ‘strongly agree’ and ‘agree’ have been combined as ‘agree’, and the same for ‘strongly disagree’ and ‘disagree’. When respondents did not specifically answer this question, this has been recorded as giving ‘no response’ to that particular question. The exact responses in agreement and disagreement for each topic area are listed in detail in the tables and figures below.

6.3. Many, but not all, respondents to the council’s Stage 2 consultation wrote comments as part of their responses. A summary of these comments are available below; this summary does not include responses from the statutory consultees or Circle Housing Merton Priory.

6.4. These comments have been summarised between people who live within High Path and respondents who live outside the estate. In general, the comments highlight similar themes regardless of whether respondents live in or beyond High Path.

6.5. Townscape: How buildings and spaces should be arranged and their general character.

Townscape	Agree/Disagree	%
Agree	55	52%
Disagree	16	15%
Neither	17	16%
No Response	18	17%
Total	106	100%



6.5.1. Responses from residents of High Path

- Some buildings need to be restored; some demolished especially the three big towers.
- Integrated balconies in new homes.
- Redevelopment should only occur in the centre and west part of the site. Concerned with the quality of the new buildings and has personal concerns with the new properties.

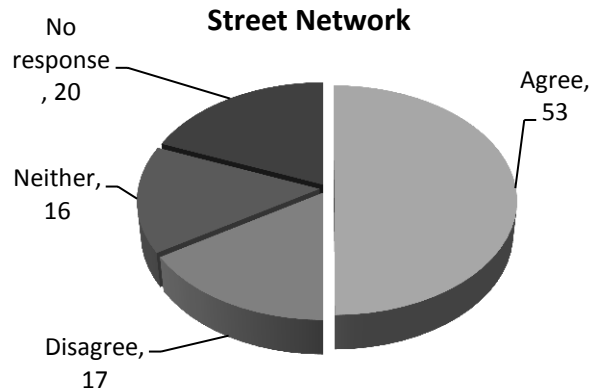
- Too much glass being used. What is the obsession with having glass everywhere? It doesn't retain heat very well and I am concerned that neither will these homes.
- There is nothing in the plan about density of occupied space and the number of units to be built. Density should be low and number of units small.
- P.94 shows Analysis & Planning Policies and suggests the three towers have a negative townscape. This is not necessarily true and needs to be compared to the idea that what's replacing them will be better. For me personally who enjoys the long views and my right to light, having 3 storey houses adjacent to 68 Nelson Grove Rd, a new road formed down the side of my property and houses with direct lines of sight into my property is much more negative than what we currently have. Other on Rodney Place also agrees that it is better to have the wide open spaces.
- New buildings must be designed to be well ventilated and able to maintain temperature and not damp.
- Continuous building lines should be set back from roads, allowing retention of existing open space feel to area.
- Setback along Merton High Street could help enhance the vibrancy of the local area, e.g. limited parking to allow access to local retailers, bus stops that are off the main traffic flow of Merton High Street, an upgraded cycle lane routing towards Cycle Superhighway 7, cycle parking for South Wimbledon underground station, environment and landscaping.

6.5.2. Responses from respondents living outside High Path

- Prefer pitched tiled roofs with unobtrusive solar panels.
- Agree - space between pavement and buildings should be retained to maintain feeling of space on Merton High St, also between Pincott Rd to South Wimbledon station. New London Vernacular bland featureless - we can do better! Make area attractive like East Rd, Southey St, corner of North / East roads, Dreadnaught Close off Brangwyn Crescent.
- Build houses and flats to reflect surrounding streets. Plans should give guidance on building materials.
- All roads to have pavements.
- No need for landmark buildings at entrances.
- 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.
- New London Vernacular style is supported however more explanatory details including photos of this style are requested for inclusion in the Plan.
- A variety of building types are requested including those with small front gardens. Specific suggestions on roofing styles, amenity space, building materials and colour.

6.6. **Street Network:** The arrangement and layout of streets and what they should look and feel like.

Street Network	Agree/Disagree	%
Agree	53	50%
Disagree	17	16%
Neither	16	15%
No response	20	19%
Total	106	100%



6.6.1. Responses from residents of High Path

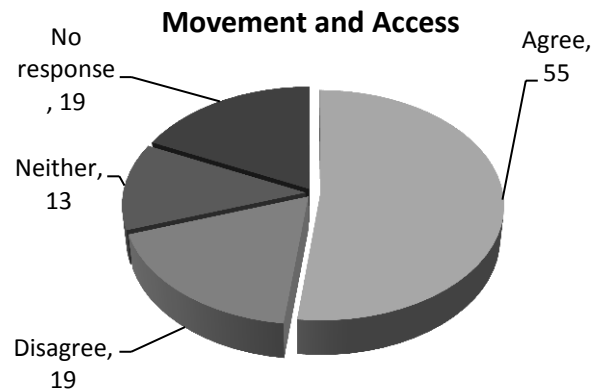
- Battles streets are blocked to through traffic so why extend streets through High Path? More pollution, unsafe for children.
- Preference is for roads or streets rather than Crescents or a Close.
- Could have a cycle café with outdoor greenspace, bicycle cages, lockups and other facilities to encourage people to use Cycle Superhighway 7.
- Fewer roads should be created in a society (and city) needing to rely more on public transport and less on cars.
- Streets on the north side of Merton High St have bollards to stop access.
- Increasing access to Merantun Way will increase traffic and the number of 'rat runs' through the estate.
- Current three entrances onto the estate and three exits benefits people here as it stops overuse by non-residents.
- Only diagonal street will make walking to the underground quicker.
- More roads will create rat runs that will encourage people from outside the estate to use the area.
- Houses/flats should be built along Nelson Grove Rd, not perpendicular to it, mimicking or having traits of designs to that of 68 Nelson Grove Rd in order to blend development with surrounding area

6.6.2. Responses from respondents living outside High Path

- Need landscaping details on all roads around site (e.g. Merantun Way, Abbey Rd, South Wimbledon tube).
- Tower blocks could be re-clad as a visual statement in bold colours and reworked at ground floor to prevent wind tunnels. Blocks have views from Wimbledon Hill Road to Colliers Wood.
- Housing needs statement is difficult to read and understand and does not consider properly disabilities.

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

Movement and access	Agree/Disagree	%
Agree	55	52%
Disagree	19	18%
Neither	13	12%
No Response	19	18%
Total	106	100%



6.7.1. Responses from residents of High Path

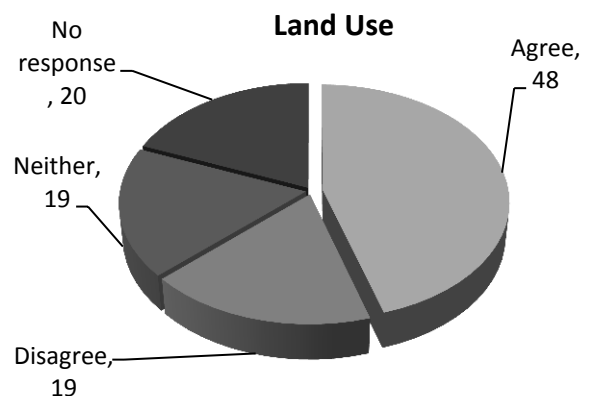
- Need increased parking for current & future residents. Off street basement parking ideal.
- Need parking controls to stop non-residents parking.
- Need 4 permits + visitor permits per household.
- Is Tramlink really needed for South Wimbledon?
- Any development should have easy access for all vehicles and on foot.
- Suggest for a number of the following roads to be blocked; Merton Junction with the High Street and the corresponding roads north of Merton Junction.
- Concerned with traffic flow. Highlights that 'Dane Road' is a rat run during the rush hours.
- Notes that the Abbey and Mille Road Area will be the areas most affected by this proposal. Disagree that Abbey Road should be the main access point. Suggests for Abbey Road to be a non-motorist road only. Disagree with making Abbey Road a 'thru route' to Merantun Way. 10).
- Suggests to incorporate traffic control for the Mill Road Area.
- There is an urgent need for cycle paths and footpaths to encourage environmentally modes of movement.
- Excellent layout and careful planning.
- Regenerating estate may make rat running worse.
- South Wimbledon junction traffic management needs to be considered as part of any changes. Junction delays from motorists travelling on Morden Road northbound and wanting to turn east encourages cars to rat run through Abbey/Dane/Meadow/Croft/Mill roads to access Merton High Street and Haydon's Road. Addressing this will help protect residents from cars racing through their streets.
- The 1910 picture of Merton High Street has no bearing on today's use of the road as a major trunk road with a large volume of traffic including ambulances to St George and buses.
- A tunnel would be needed below the main road to create better access to Merton Abbey Mills. Would be expensive.

6.7.2. Responses from respondents living outside High Path

- Suggestion for provision of on-street parking, underground car park and cycle docking stations.
- Opportunity provided by redeveloping the High Path estate should be used to identify and implement a permanent solution to the issue of vehicles using Abbey Road as a rat run. Best chance for decades to address this issue which is a problem for estate and surrounding roads.
- Traffic calming done on Abbey Rd only pushed traffic onto other roads. Concerns over negative impact of increased vehicular traffic on adjoining residential roads, e.g. Abbey, Dane, Mill, Meadow Rds.
- Commercial vehicles should be restricted from local roads in morning peak for quality of life.
- Danger of Pincott & Nelson Grove Road becoming rat runs.
- Parking must be managed; any underground parking must be secure.
- Pedestrian crossing proposed for by the corner of Merantun Way and Morden Road, by the corner of Nelson Gardens, crossing Morden Road. This would mean that High Path residents could walk through Nelson Gardens, easily cross a busy road and enjoy the greenspaces -Abbey Recreation Grounds and the nature reserve, Merton Park Green Walk.

6.8. Land use: Suitable land uses for each neighbourhood.

Land use	Agree/Disagree	%
Agree	48	45%
Disagree	19	18%
Neither	19	18%
No response	20	19%
Total	106	100%



6.8.1. Responses from residents of High Path

- Extremely important for good of whole area is provision of fenced mid-sized pocket play areas for children and fenced MUGAs for teenagers, should be overlooked by flats for safety and stop anti-social behaviour. Fences protect homes from footballs, keep children safe from cars and keep dogs out. Good for fitness and health. Commercial units should be on Merton High St and around tube, away from residential areas to prevent noise and litter.
- Wants effective enforcement of parking permits to stop abuse of these.
- Parking for residents and visitors only.

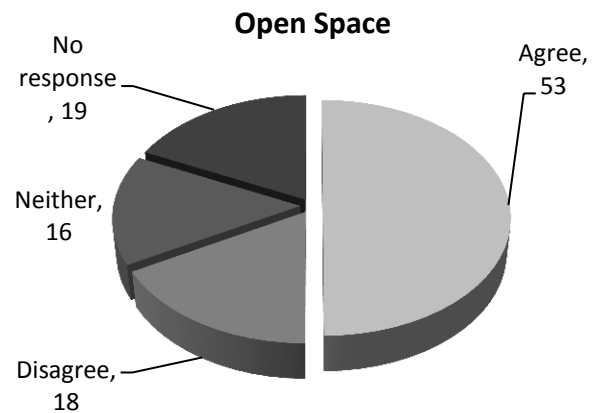
- Estate must have its own Controlled Parking Zone and residents should not be allowed to park in nearby CPZs which are already near capacity.
- How much basement parking will there be (per new household).
- Concerned with the doubling of existing capacity on site with regards to tube tunnels, noise, pollution and local infrastructure.
- Agree with land use policies but asks would more housing make the area more cramped.
- Why replace shop on Pincott Road as it encourages litter.
- Would like to know who will maintain open space, highways and footpaths?
- To include community facilities e.g. play groups.
- Plan should show how waste will be looked after.
- Thinks that space is well defined.
- A number of preferences raised including the provision of ground floor disabled flats; elevators for floors above two storeys; energy efficient heating and water systems; external storage space for flats; provision of children's play area (0 - 10 years of age); rubbish disposal areas located adjacent to homes; parking space allocations per flat and provision of disabled and guest parking spaces and installation of CCTV cameras.

6.8.2. Responses from respondents living outside High Path

- The overall density should be planned taking account of the pressure on local services. Specific suggestions on the mix and location of any proposed residential and retail uses on Merton High Street. Replacement of the existing convenience store is noted. Provision of a community centre and relocation or retention of existing sports courts is requested.
- Essential to provide enough parking.
- Object to loss of parking on the High Path estate which will move parking pressures onto neighbouring areas.
- Providing new estate with a community atmosphere important.
- Residential density should not be too high near station.
- Think carefully before providing more shop / business space in case unused; prioritise unusual, creative individual retailers, small businesses. Must replace local convenience shops to create community sense.
- No more takeaways. Reduce business rates to encourage range of shops.

6.9. **Open space:** The location and type of spaces that should be provided for each neighbourhood.

Open space	Agree/Disagree	%
Agree	53	50%
Disagree	18	17%
Neither	16	15%
No Response	19	18%
Total	106	100%



6.9.1. Responses from residents of High Path

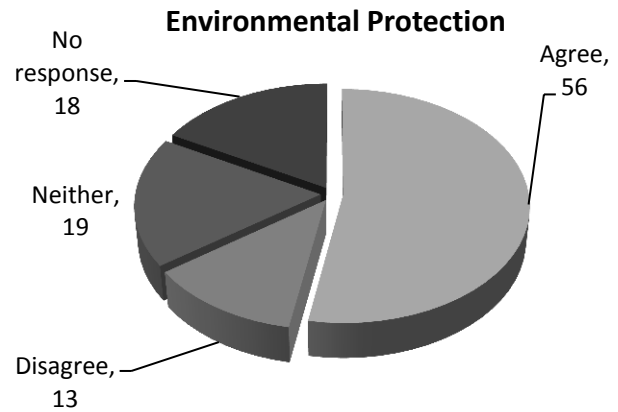
- Large space with broad range of uses will either not be used at all or misused as no-one feels responsible. Should have community centre with small hall, kitchen and outdoor terrace for cheap hire. No need for adult public garden as people will use balconies or doorsteps or nearby Merton Abbey Mills. Why is veg growing part of the regeneration plans?
- Disagree - no justification for central park.
- Concerned with the demolition of existing houses to create open space.
- The proposed development should open up green space leading to and encourage access to St John the Divine church.
- Suggest for green buffer zone and trees to be located near to all thru roads on the new estate in order to reduce pollution and noise. To create new recreational space at the heart of the space.

6.9.2. Responses from respondents living outside High Path

- Strongly agree - large central open space and number of smaller spaces throughout the estate best. Think carefully about art in case vandalised.
- Suggested preference is for the provision of medium or small open spaces rather than one large open space.

6.10. **Environmental protection:** How to maximise opportunities for biodiversity and prevent flooding.

Environmental protection	Agree/Disagree	%
Agree	56	53%
Disagree	13	12%
Neither	19	18%
No Response	18	17%
Total	106	100%



6.10.1. Responses from residents of High Path

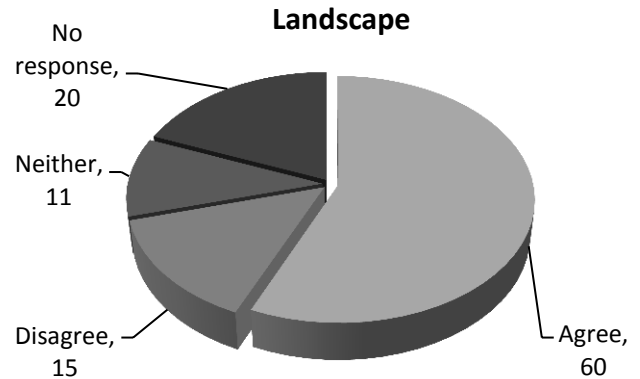
- As reason for regen proposal is to achieve Decent Homes and current homes damp, then building materials and methods should exceed minimum standards for noise, damp etc. and be built to last, not need repairs in 20 years.
- Priory Close sewers always getting blocked now - new pipes and sewers must be designed to cope.
- Would like better CCTV that works and more lighting.
- Should have independent dual energy, not linked to energy centre.
- Should incorporate sustainable energy, wildlife, green walls/ roofs as part of the scheme.
- Proximity to river Wandle floodplain should be taken into account.
- Air pollution from vehicle flow will increase and must be considered against providing new roads 3.148 - 3.154 and physical traffic calming measures.

6.10.2. Responses from respondents living outside High Path

- Strongly agree - install solar panels.
- Various specific suggestions made for Merton High Street concerning the retention and re-positioning of existing trees, and the planting of new native trees.
- All trees of environmental use, ornamental delight or haven for nature should be retained.

6.11. **Landscape:** How each neighbourhood can use and building upon existing landscape assets to create high quality places.

Landscape	Agree/Disagree	%
Agree	60	57%
Disagree	15	14%
Neither	11	10%
No Response	20	19%
Total	106	100%



6.11.1. Responses from residents of High Path

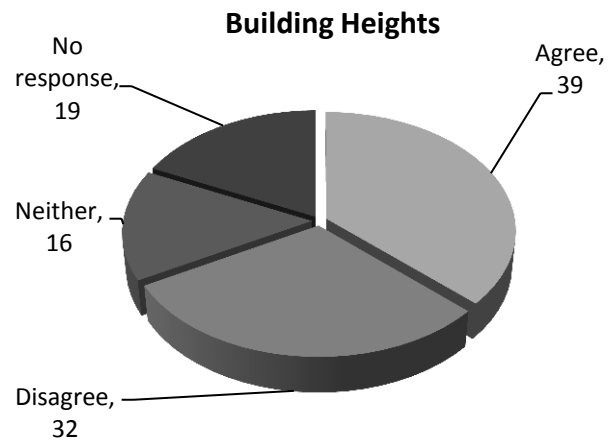
- Wants any trees that are cut down to be replaced.
- Pincott Road should have open space and trees to the western side the same as the eastern side to enhance the feeling of a green corridor on this very urban road.
- The design of the estate should be geared to reducing cars, increasing public transport and green spaces.

6.11.2. Responses from respondents living outside High Path

- Continue green setback and treeline along Merton High St to give local amenity, sense of light, green space.
- Strongly agree - make sure detailed management plan in place.
- Specific suggestion regarding landscaping of the green space located beneath the existing Plane trees on Merton High Street.
- Disagrees with the description (p.96) of area of poor landscape value relating to High Path pavement next to industrial and public buildings where landscape isn't present.

6.12. **Building heights:** Appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area.

Building heights	Agree/Disagree	%
Agree	39	37%
Disagree	32	30%
Neither	16	15%
No Response	19	18%
Total	106	100%



6.12.1. Responses from residents of High Path

- 7-9 storeys too high. Usually brings anti-social behaviour. 5-6 storeys ok.
- Proposed building height on Merton High St too great, buildings would put street in deep shade during winter.
- Morden Road frontage should be retained at 4 storeys, 7-9 too tall, will overshadow Priory Close, will make Morden Road darker, will create wind problems, will not even out building heights on Morden Road.
- Strongly agree. Tower block building or tall building not supported.
- Homes in excess of 5 storeys are not supported.
- Disagree with building 4 storeys on Abbey Road. Suggest that residents on Abbey Road should not be overlooked.
- Concerned about 7-9 storeys proposed for Morden Road. New building [Spur House] a monstrosity. Occupants of the two added storeys can now look into the bedrooms of the houses opposite so no privacy. All high rise buildings should be capped at 7 storeys.
- New development on the Abbey road side should not exceed 2 stories as this would be in keeping with the surrounding areas of Meadow Road etc. where houses are that height.
- Generally agree except for building heights which should be lower.
- Existing building heights on Abbey Road should be retained to prevent the area feeling even more enclosed and unfriendly.
- Buildings on south side of Merton High Street should be limited to three storeys (not 4 to 5 storeys as currently proposed) in order to mirror buildings on the north side of Merton High Street to avoid creating a hemmed in feel to the road and to prevent excessive blocking of sunlight.
- Lower heights beside narrower streets such as Rodney Place, High Path, Abbey Road, and Merton High Street: - Lower heights should be extended to include all buildings to the eastern end of the estate approaching Abbey Road including the eastern end Hilborough Close and

Nelson Grove Road. - The maximum building height on these streets should not exceed 2 to 3 storeys to blend into the character and height on Merton High Street and Abbey Road.

- As with designs in other major cities e.g. Stockholm, Berlin, buildings 7 storeys high tend to have large communal green spaces in the centre of the complexes.

6.12.2. Responses from respondents living outside High Path

- Maintain Morden Rd at 4 storeys. Put pitched rooves for attractiveness, solar panels and insulation for heating / cooling. Keep Abbey Road at 3 storeys. Buildings should be much lower than 7-9 storeys.
- Agree that the buildings fronting the High Street should be restricted to 4 storeys (with potential for a 5th storey setback). Morden Road - Specific suggestions on building height restrictions (largely 6- 7 storeys) on the basis of being in keeping with existing buildings behind in the rest of the High Path Estate. A different height restriction (4-5 storeys) across the rest of the High Path Estate the site is suggested.
- Building heights should be lower generally.
- Keen not to have tall buildings on Abbey Road.

7 Response to Policies

7.1. The table below summarises the results of respondents’ opinions of specific policies within the draft Estates local plan.

Policy	Townscape	Street Network	Movement and Access	Land Use	Open Space	Environmental Protection	Landscape	Building Heights
Agree	55 (52%)	53 (50%)	55 (52%)	48 (45%)	53 (50%)	56 (53%)	60 (57%)	39 (37%)
Disagree	16 (15%)	17 (16%)	19 (18%)	19 (18%)	18 (17%)	13 (12%)	15 (14%)	32 (30%)

Table 3: Number and proportion of respondents who either agree or disagree with specific policies

7.2. The response to the policies shows that 50% or more of respondents agreed with 6 of the 8 policies.

7.3. Only 45% of respondents agreed with the Land Use policy, with the numbers of those who disagreed, gave no response or neither agreed or disagreed, marginally higher than the other policies.

7.4. Respondents disagreed most with the Building Heights policy, with 37% in agreement and 30% in disagreement.

8 Other matters

The following points were raised by respondents during the consultation and relate to the regeneration and its delivery, but not to specific policies in the consultation document.

- Generally welcome plans but needs more detail on proposed density and how new homes will be allocated to current residents.
- Merton Council needs to be more aware of subletting and abuse of properties. CHMP transfer was supposed to correct imperfections. Want Decent Homes. Overall the level of detail not sufficient to make a decision. Language leading and ambiguous.
- Provide lifts and main door security systems.
- If estate partially redeveloped, what buildings would be retained?
- Why consult when council has made up its mind to demolish estate with CHMP already?
- Gas in new homes as well as electricity. Low cost for gas / electricity.
- Strongly rejects full regeneration. Not justified More homes / green space can be built without higher rise, higher density. No consideration of supporting services: tube already overcrowded doctor's appointments etc. May support partial regen if get rid of tower blocks, improving surroundings, bringing other properties up to standard. No justification for central park in Circle plans. New properties would be smaller.
- Supportive about how the Draft Plan looks.
- Felt that should the Draft Plan come to life it will provide good opportunity for current residents.
- Plan abides appropriately to relevant guidelines. Respondent's comments appear to relate to the design codes. Considered that underground areas will have adverse physical and social consequences. Water features, trees and balconies are considered to contribute positively to residents' wellbeing. Wood is considered a preferable building material.
- Comments on the cost of the consultation and the extensive level consultation documents.
- Strongly supports regeneration and thinks that the existing buildings are in poor condition and does not think this can be addressed by refurbishment.
- Wants regeneration to go ahead.
- Queries why the council's consultation was not better publicised and felt that online version was not user friendly therefore deterred people from responding.
- The plan is silent with building on top of the Northern Line tube tunnel.
- Would like regeneration of the estate to happen as soon as possible. Is of the view that the current conditions of existing properties on-site are 'terrible'.
- Concerned with the development proposed – building heights and increase in the number of people living on-site.
- Considers that regeneration will result in less privacy, more noise and that the distance between buildings will be reduced.
- Typo on page 88 – 'Stone Close' buildings should read as two storey buildings, not three storey buildings.
- Better timelines.
- Likes their home and do not wish to see it demolished. Demolishing will result in the loss of their external spaces, garden access and access to a garage that they need.

- Rents the property from their landlord under 'rent and deposit' policy for the last 3 years. Concerned as to what would happen to them if Merton Council purchased their property? Would prefer if regeneration did not happen so that they can stay and rent this property.
- To evaluate the 'social justice' for current residents of the Mill Road Area. 12) Highlights the increase in traffic, noise and pollution from demolition, constructions and post completion. Questions the capacity of infrastructure re traffic, transport, water, gas and sewage.
- Highlights that there are grammar and spelling errors in the document e.g. "St. John De Vine"? "High Path Road" and "Rooney Place"?
- Are there any safeguards to prevent existing residents (leaseholders and freeholders) being priced out of the new properties. 4) Open Space (p112): a) 5) Building Heights (p120): a) Suggest for building heights to remain at 2 storeys near through roads to maximise light and air flow. b) Suggests for 5-6 storey buildings to be located towards the centre of the developments. 6) Considers that if Tramlink and Crossrail are implemented, that this will have an effect on traffic. 7) Land use (p108): Could existing infrastructure (tube, water, sewage and road traffic) cope with the increase of housing densities.
- The council must ensure with every planning application that residents are given the opportunity to return to the area that they resided in before the works began. Governments and local councils change politically and with that can be a change of heart. Also mergers of companies can sometimes affect a contract (CHMP are in talks for a merger with Affinity Sutton), especially with building sub-contractors so I would strongly suggest that every contingency is thought of in view of this and that CHMP are held to account very step of the way. More specifically with the procurement of its contractors for this new, and epic venture. An 'open book' of its accounting and regulated procurement is the minimum of that requirement.
- "There is not enough detail in many instances to agree or disagree."
- I appreciate that the Council is advocating on behalf of the residents and that if the Council had not sold off their housing stock in 2010 that we would be adversaries. Thank you to Merton Council, Future Merton and the Abbey Ward Councillors.
- Need a proper draft drawing of a disabled unit.
- No indication of programme.
- I am a private individual who is renting out my property. In light of the income stream that my property represents and in respect of the government's recent stamp duty tax revisions on second property purchases, the current compensation plans will not meet requirements to adequately replace this asset. I am happy to be contacted directly to discuss this further.
- New homes must be same or larger footprint as existing, inside and out. Want individual utility services, same freehold terms and conditions, same appropriate house type.
- Safeguards must be given based on data for CHMP to honour their residents offer.

Ravensbury extract of the London Borough of Merton draft Estates Local Plan

Stage 2 Consultation 1st February 2016 – 18th March 2016

London Borough of Merton

October 2016



1 Introduction

1.1. A consultation took place between 1st February and 18th March 2016 on the London Borough of Merton's Draft Estates Local Plan. 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.

1.2. This document summarises the responses that were received on the High Path estate. The consultation documents and all responses received (minus personal details) can be found on Merton Council's website www.merton.gov.uk/estatesplan

2 The vision for Ravensbury

2.1. The draft plan's vision for the Ravensbury estate is to create a new Suburban Parkland setting that protects and enhances landscape quality and biodiversity. The plan suggested the estate be characterised by buildings arranged as traditional streets and spaces that improve links to the surrounding area. This would allow for the landscape to penetrate the site increasing the number of homes whilst retaining the character of the parkland setting. The plan also highlighted the need for improved flood mitigation.

3 Consultation responses received

3.1. The Ravensbury estate consists of 192 dwellings. Altogether 113 responses were received from people living on and around Ravensbury, statutory consultees, residents groups, businesses and others. These responses were received in a wide variety of ways: letters, emails, questionnaires and online surveys. Those who wrote letters and emails to the council outlining their opinions on the Draft Estates Plan but did not fill out a questionnaire or online survey specifically stating a preference for regeneration are included in the qualitative analysis section of this report. For the purpose of quantitative analysis, any response that did not specifically answer a question has been recorded as 'no response'; for example, where respondents provided a narrative but did not tick a box selecting a particular preference. Similarly where questions in the questionnaire and survey were left blank, entries have been recorded as giving 'no response' for that particular question.

3.2. All responses, including those of the statutory consultees (Greater London Authority, Environment Agency, Sport England, Historic England) National Grid and Circle Housing Merton Priority are available online via www.merton.gov.uk/estatesplan.

4 Who responded to the consultation

4.1. The estates are geographically separate and most respondents commented on just one neighbourhood. 113 responses were received that related directly to the Ravensbury section of Merton's Estates Local Plan.

Respondents were asked to indicate which category best described their position. Table 1 and Figure 1 below show the number and proportion of respondents from each category. 66% of respondents did not indicate their position, and the next largest proportion of respondents was 12% Circle tenants. Table 2 and Figure 2 show the breakdown of respondents according to Private (Resident Leaseholders and Resident Freeholders) and Affordable (Social Rent). This has been used to see if the proportion of responses received was representative of the proportion of residents of each category known to reside on the estate. However, 75 of the responses gave no indication of their tenure type or relationship to the estate. Therefore it is not known whether the responses received are representative of the types of residents and others with an interest in the estate.

Ravensbury respondents	Responses	Proportion
Resident Leaseholder on estate	2	2%
Resident Freeholder on estate	9	8%
Circle Tenant	14	12%
Statutory Organisation	3	3%
Private Tenant on estate	6	5%
Respondent Outside Estate	3	3%
Absent Landlord	1	1%
Unknown	75	66%
Total	113	100%

Table 1: Tenure of all Ravensbury respondents

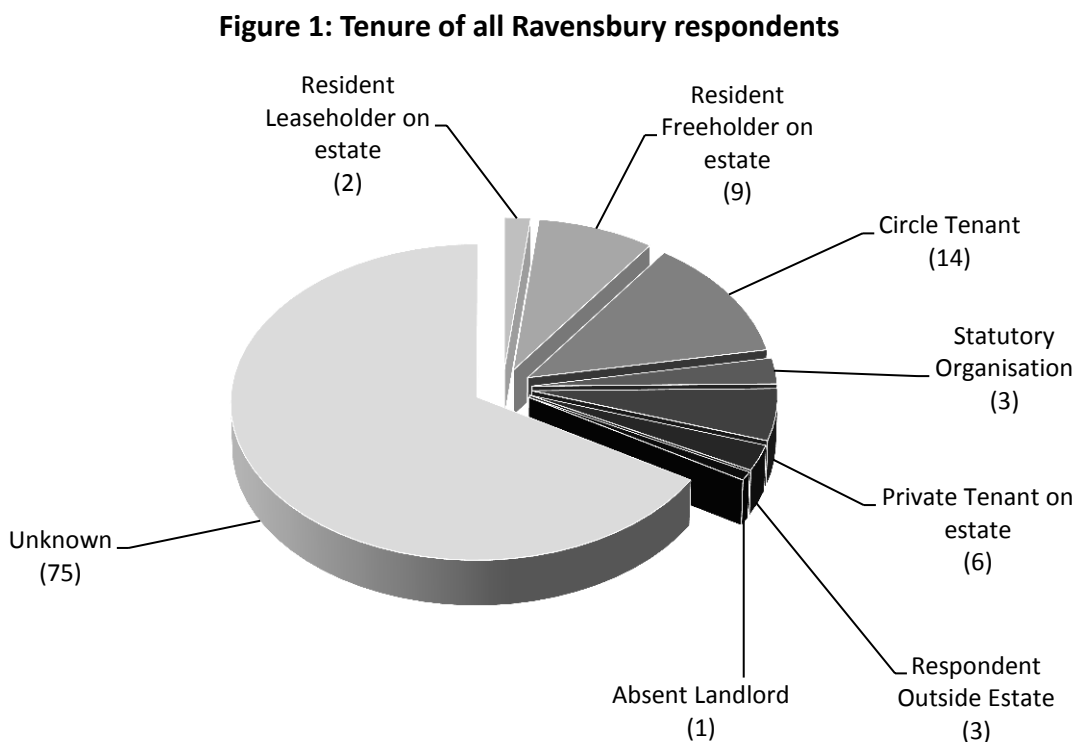


Figure 1

5 Question 1: Preference for regeneration

5.1. The first question on the questionnaire asked respondents for their preference for regeneration.

The question asked was:

5.2. **Having read and considered the council's draft Estates Local Plan and supporting documents please indicate your preference at this stage for regeneration from the following options:**

5.2.1. Option 1: Demolish and redevelop the entire Estate

Redeveloping the whole estate would mean demolishing and replacing the existing buildings and replacing the existing buildings to provide well-designed energy efficient new homes and general improvement to the neighbourhood, including connections to the surrounding areas.

5.2.2. Option 2: Partial redevelopment

Retain some buildings and redevelop the majority of the estate to provide a number of benefits, such as well-designed energy efficient new homes but with fewer benefits to the neighbourhood.

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

Refurbish all Circle Housing Merton Priory and leasehold properties to ensure they meet current minimum housing standards and have reasonable kitchens, bathrooms, windows, wiring and insulation. All leaseholders would have to share the costs of this work. This would not include changes to the outside areas.

5.3. 110 of the 113 responses provided an indication of preference for regeneration, and 3 gave no response. The graph in Figure 2 below shows the preference for regeneration given by all respondents.

Figure 2: All respondents - views on regeneration

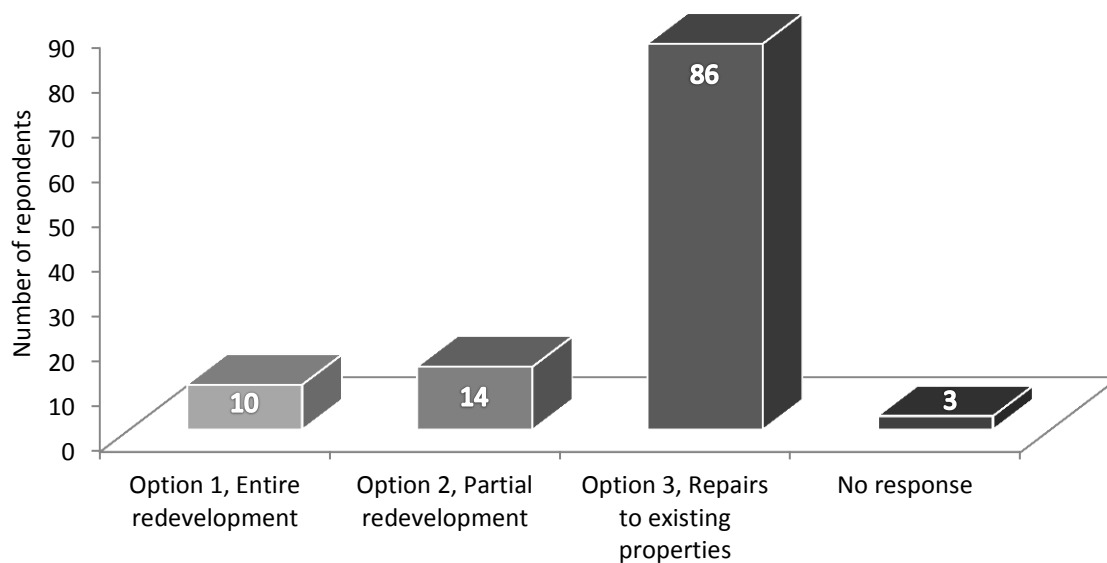


Figure 2: All respondents - views on regeneration

5.4. Figure 2 shows the preference for regeneration from all responses, including the views of statutory organisations and other respondents outside the estate. Of the three responses received from statutory organisations, two gave a preference for partial redevelopment and the other gave a preference to investment in existing properties. Of the 3 respondents outside of the estate one gave preference to partial redevelopment, one to investment in existing properties and the other gave no response. The absent landlord preferred entire redevelopment of the estate.

5.5. Table 3 below gives a detailed breakdown of the preferences for regeneration received from each tenure group.

Tenure	Option 1 Entire redevelopment	Option 2 Partial redevelopment	Option 3 Investment in existing	No response	Total
Resident Leaseholder on estate	0	1	1	0	2
Resident Freeholder on estate	0	2	7	0	9
Circle Tenant	2	0	12	0	14
Statutory Organisation	0	2	1	0	3
Unknown	7	7	60	1	75
Private Tenant on estate	0	1	4	1	6
Respondent Outside Estate	0	1	1	1	3
Absent Landlord	1	0	0	0	1
Total	10	14	86	3	113

Table 2

Figure 3 below shows the responses to Question 1. 86 of 113 respondents chose Option 3, to invest in existing properties. 14 respondents chose Option 2 for partial redevelopment and 10 chose Option 1 for entire redevelopment. This shows that there is little appetite for regeneration of the Estate, with a strong preference for refurbishment of existing properties to bring them up to minimum modern standards.

- From the information available it appears that Option 3 was the preferred choice for Resident Freeholders, Circle Tenants and Private Tenants on the estate
- Amongst Circle Tenants 12 chose Option 3, 2 chose Option 1 and none chose Option 2
- Of the Resident Freeholders 7 chose Option 3, 2 chose Option 2 and none chose Option 1
- Of the 3 Statutory Organisations, 2 chose partial redevelopment and 1 chose investment in existing properties.
- Of the 3 respondents from outside the estate 1 chose partial redevelopment, one chose investment in existing properties and 1 gave no response.
- The 1 respondent, who was an absent landlord, chose entire redevelopment.

Figure 3 shows the breakdown of the types of respondents that chose each option. These are all relatively small numbers compared to the 75 responses received with no indicated position.

Figure 3: All respondents - views on regeneration

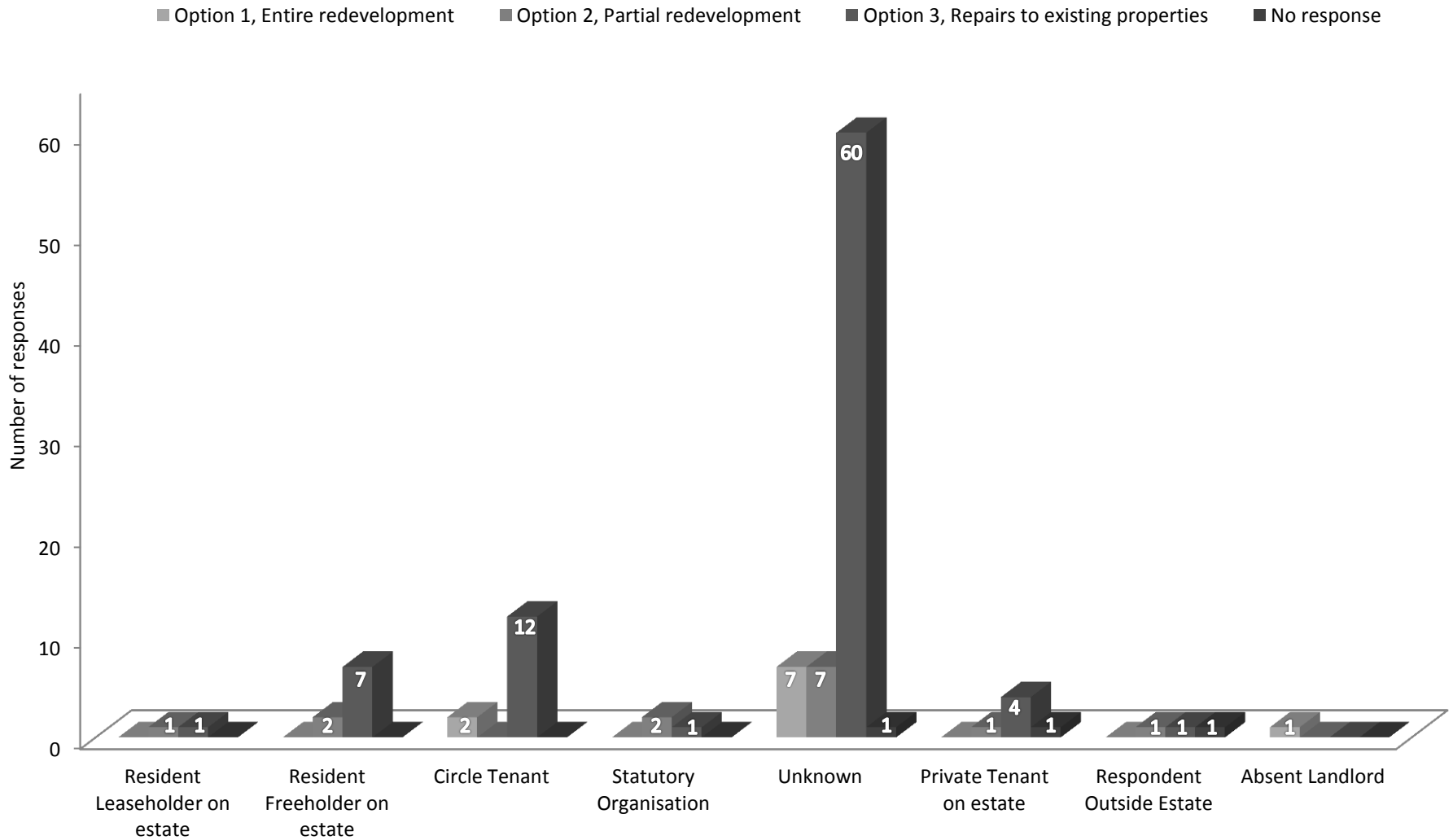


Figure 3: All respondents – views on regeneration

6 Respondents were then asked for their opinion on specific policies within the draft Estates Local Plan. The question asked was:

6.1. 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:

6.2. For each topic area respondents chose whether they strongly agree, agree, strongly disagree, disagree, and neither agree or disagree. For the purposes of this analysis ‘strongly agree’ and ‘agree’ have been combined as ‘agree’, and the same for ‘strongly disagree’ and ‘disagree’. When respondents did not specifically answer this question, this has been recorded as giving ‘no response’ to that particular question. A new category, ‘mixed’ was added for those responses that said they agree with some elements of the specific policy but not others.

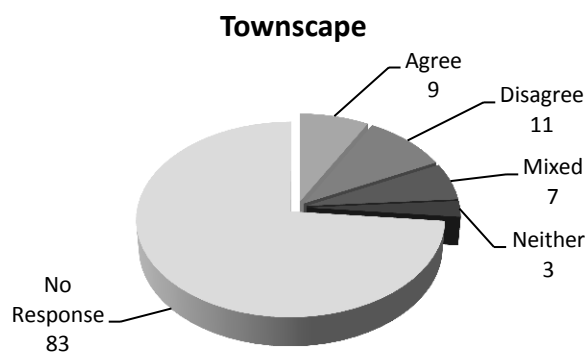
6.3. The number of respondents who gave no response to this section of the consultation was very high ranging from 83 to 93 out of 113 across each topic. The exact responses in agreement and disagreement for each topic area are listed in detail in the tables and figures below.

6.4. Many, but not all, respondents to the council’s Stage 2 consultation wrote comments as part of their responses. A summary of these comments are available below; this summary does not include responses from the statutory consultees or Circle Housing Merton Priory.

6.5. The council received an extensive 58 page response from the Ravensbury Resident’s association. This response has been summarised separately within this document.

6.6. Townscape: How buildings and spaces should be arranged and their general character.

Townscape	Agree/Disagree	%
Agree	9	8%
Disagree	11	9.7%
Mixed	7	6.2%
Neither	3	2.7%
No Response	83	73.5%
Total	113	100%



6.6.1. Responses from residents of Ravensbury

- Agree to policies apart from Ravensbury Court proposals to provide entrances facing Ravensbury Grove Road.
- In general supportive.
- Make clear that entrance to the park referred to is at mill p.146.

- Para. 3.246 Secondary woodland that has established within the foundations has value for wildlife and the proposal to uncover the foundations should be carefully considered by Greenspaces and others in relation to its impact on biodiversity and the character of the park. And item 3.225".
- Opposed to reconfiguration of Ravensbury Court flats para. 3.247.
- "Agree with para. 3.244, 3.245, 3.246, 3.249, 3.252 and 3.250 (pedestrian only access)
- Opposed to para. 3.247 reconfiguration of Ravensbury Court.
- Strongly disagree with para. 3.248 frontages will look uniformed.
- Para.3.251 disagree as tall buildings' will integrate well to mill context and the park will be overlooked.
- Para. 3.253 disagree with need to enhance setting of mill, already well known to those who visit it.
- Para. 3.254 disagree will make road more hazardous - dangerous bend with high speed traffic.
- Para. 3.255 disagree Ravensbury Manor is insignificant. Para. 3.256 opposed to reconfiguration of Ravensbury Court."
- "Agree with strengthening the Wandle Trail.
- Disagree with changing internal layouts to Ravensbury Court Flats - will increase noise and reduce security.
- Disagree that Ravensbury court has a dead frontage. No additional roads or paths should be created into the estate.
- View from Wandle Bridge into Ravensbury Park is fine and does not need widening.
- New buildings should not face Ravensbury Park.
- There is no need to enhance the setting of the Mill as it is quite clearly visible as it is.
- Removing the fence around Morden Hall Park will encourage people to park cars on Morden Road, which would be dangerous."
- Agree.
- Agree in principle with the ideas to improve the entrance to Ravensbury Park.
- Agree with using historical references to inform a design theme for the estate.
- Do not agree with proposals to change the layout of Ravensbury Court. Front doors near other front doors gives residents a feeling of security and enables them to know their neighbours.
- Agree to general architect proposals but not to Ravensbury Court proposal.

6.6.2. Responses from the Ravensbury Residents Association

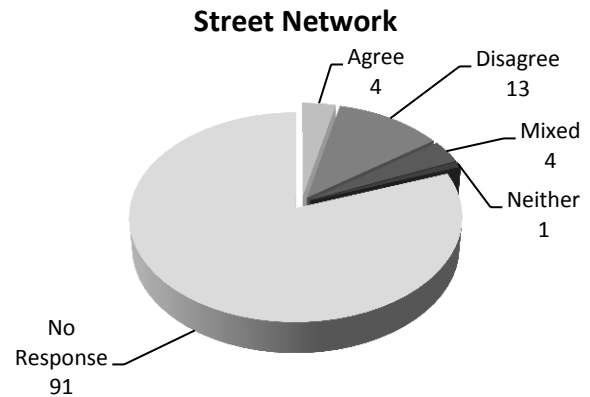
- a) In agreement to improvements to park entrance into Ravensbury Park however must be carefully designed to maintain the peaceful character of the park. Opportunity to create underpass 'animal subway' on Morden Road to facilitate wildlife crossing safely. Suggestion to replace current bridge on Morden Road to serve higher capacities during flooding and wildlife needs, well designed bridge could become landscape feature allowing for better views into park and could also be designed as a traffic management feature.

- b) Agree that all buildings should be designed with sensitivity and relevance to local architectural focal points. Use of bricks on all facades is preferred. Buildings should be designed to scale which respects existing. 3 storeys plus a tiled pitched roof should be maximum height. 4 storeys with flat roof would not be in keeping with the character of the area. Roof design part of character of area, all roofs in Ravensbury are tiled pitched roofs, all new roofs should utilise this theme potentially as mansard roofs to accommodate increased building heights.
- c) In agreement with need for development to be sensitive to 'The Surrey Arms', any new building that occupies site opposite pub should be restrained to 3 storeys plus tiled roof so as not to overwhelm key buildings and Morden Hall Park.
- d) Scale is important therefore expect a 3 storey pitched tiled roof maximum height. Flat roofs to be avoided however mansard roofs and dormer windows could allow for increased height.
- e) In agreement with utilising local history, in addition street and building names should reflect existing.
- 3.244 Opposed to railings on Morden hall park as would affect tranquillity of park-retain wooden fence however enhance and increase visibility to Morden Hall Park around entrance with decorative brick wall forming the base to railings as per other entrance.
- 3.246 In agreement information panels within park would be of great benefit.
- 3.247 Opposed to this suggestion.
- 3.248 In agreement with design housing which faces Morden Road. Tiled roofs, two storey construction and reasonable density lend themselves towards promotion of the landscape. New development should not obstruct views to the landscape. Not in agreement of description of Ravensbury Court frontages as 'dead'. Residents feel appearance of Ravensbury Court & Hengelo Gardens and the spaces around them are attractive. Landscape management of these spaces has been poor and residents feel that cannot take ownership of landscaped spaces.
- 3.249 In agreement with strong building line of Orlit houses which define the curvature of Morden Road. Residents appreciate the seclusion of the estates design and do not want any additional vehicle or pedestrian routes through the estate.
- 3.250 In agreement with well-considered enhanced entrance into Ravensbury Park disagree with visibility of entrance by mill; entrance by doctor's surgery is less visible.
- 3.251 in agreement with utilising brick facades and tiled roofs as per mill however there should be an emphasis on mansard roof design rather than flat.
- 3.252 in agreement.
- 3.253 Generally agree however would like height limit or design code to ensure buildings in close proximity to mill are designed to minimise impact on both the park environment and mills location.
- 3.254 As before opposed to change in boundary treatment however welcome enhanced park entrance.
- 3.255 as before (3.246) in agreement.
- 3.256 see 3.247 strongly opposed.

- R1 Townscape map location opp. Surrey Arms requires sensitivity in terms of scale and massing, building should take cues from Surrey Arms and White Cottage. 3 storeys max with tiled mansard roofs. Area around mill dangerous for new crossing unless adequate traffic calming measures implemented. Restrict scale of any new building in proximity to mill to minimise impact on mill and park. Reconfiguration of flats is a bad idea.

6.7. Street Network: The arrangement and layout of streets and what they should look and feel like.

Street Network	Agree/Disagree	%
Agree	4	3.5%
Disagree	13	11.5%
Mixed	4	3.5%
Neither	1	1%
No Response	91	80.5%
Total	113	100%



6.7.1. Responses from residents of Ravensbury

- Don't believe the estate is isolated and current layout is what creates village feel.
- No new footpaths or streets needed and existing street layout should be retained.
- The parallel access lane on Morden Road should be kept and more parking is needed, not less.
- Ravensbury Grove should not be extended to the park.
- Agree cautiously with enhancing Hengelo Gardens.
- Less height to new buildings will ensure good views.
- Disagree with idea of 'opening up' the estate as it will undermine the 'relative isolation' which is what makes it a nice place to live.
- • We do not want any extra through-roads or unnecessary traffic or people coming through the estate.
- No need to remove access lane on Morden Road - the parking is needed and there are plenty of trees already, as well as an existing cycle route."
- Disagree. Existing network proven to be very safe and secure. New east-west roads are not needed at all.
- Supports EPR2 a) + c). Opposed to EPR1 b) + e) opposed to new roads. Opposed to new streets.
- Supportive of EP R2 a) Opposed do EP R2 b) Support the retention of Hengelo gardens Opposed to the introduction of new roads or walkways.
- Supportive of EP R2 a-b) Opposed to the introduction of new roads or walkways.

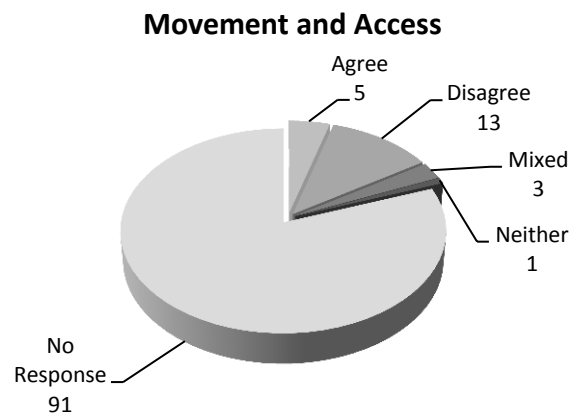
- Strongly disagree: RP.R2 opening up Ravensbury to vehicles will create rat runs and contradicts "quiet and peaceful" aspirations.
- Strongly disagree. Do not like the proposal for more street access due to crime concerns.

6.7.2. Responses from the Ravensbury Residents Association

- a) In agreement with retention of historic streets however need to also retain the current curve on Ravensbury Grove Road southern end which serves to slow traffic. Street should be designed with traffic management taken into consideration as road has served as incidental play space.
- b) Opposed to this suggestion, as glazed area at end of Ravensbury Grove Road provides attractive line of sight for pedestrians and forms part of the park entrance.
- c) In agreement with the retention of Hengelo Gardens however consideration must be given to grassed area, swales could degrade grassed area. Potential to improve parking arrangement here in consultation with residents.
- d) Opposed to new streets from Morden Road to Ravensbury Grove Road. Permeable layout has security risks, existing layout on positive effect in reducing burglary style crime relative to other areas.
- 3.257 In agreement focus should be made on the park entrances and pathways to nearby tram stops.
- 3.258 Opposed to the removal of Morden Road access lane as it is useful for residents as parking area, play area and cycle path.
- 3.259 Residents feel the estates isolation is a strong positive aspect.
- 3.260 Opposed to opening frontage onto Morden Road via new street & footpath connections.
- 3.261 Opposed to east-west streets, residents do not want through traffic.

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

Movement and access	Agree/Disagree	%
Agree	5	4.4%
Disagree	13	11.5%
Mixed	3	2.7%
Neither	1	0.9%
No Response	91	80.5%
Total	113	100%



6.8.1. Responses from residents of Ravensbury

- A new bridge over the River Wandle will be of no benefit to residents and create a rat run that will affect the safety and security of residents and pedestrians.
- Fewer bridges to park are preferred as this has caused anti-social behaviour in the past by motorbikes.
- Believe there are plenty of options to access the estate.
- All roads and paths are adequate and no changes are needed to them.
- General worry about security and that more routes would mean less security.
- Disagree that estate has low accessibility - transport links are very accessible.
- The alley to Morden Road is perfectly fine and it is not easy to get lost on the estate.
- Road crossings and signage between Morden Hall Park and Ravensbury Park are perfectly adequate.
- Provide an extra bus stop on Morden Road.
- Extra traffic is forced onto Morden Road because you cannot turn right from Wandle Road onto Bishopsford Road."
- Parking will become a major issue as spaces are not being increased in line with more people. More parking is necessary. Many people also have vans and trucks for work and this has not been accounted for.
- No need to restrict traffic movement on Morden Road.
- Cyclists don't use the parks because flies get in their mouths.
- Do not support an extra bridge across the river as an open and less overgrown area encourages burglaries because back gardens are more visible.
- Disagree. Existing design is of a very high standard. Alley is well lit and prevents motorcycle use. Enhance existing only.
- Unsupportive of proposed changes.
- Disagree - can achieve greater park access, bridge over Wandle, improve access to tram stop etc. without knocking down homes.
- Strongly disagree. Reduction in parking is a major concern and needs to be addressed.
- Reduction in parking is a major concern and needs to be addressed.
- Better signs for the Wandle Trail are supported.
- Entrance to the park has already been widened. More cut-throughs/entrances to the park will attract anti-social behaviour and litter.

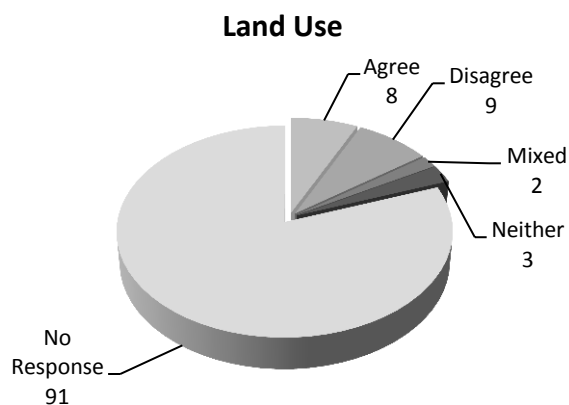
6.8.2. Responses from the Ravensbury Residents Association

- a) Opposed to increase in pedestrian routes due to anti-social & criminal access. Residents near Hengelo Gardens are strongly opposed additional bridge due to anti-social & criminal access. Keeping area to the rear of Hengelo Gardens closed off will ensure security and protect biodiversity.
- b) Residents have annotated map with potential crossing points, position 1 near mill is thought to be dangerous, and position 2 is potentially better location as bend relatively more open.

- c) Not in agreement, existing slip road acts as shared space, propose new stretch of road should be shared space.
- d) In agreement with retention of Morden Road slip road as access for residents however opposed to creation of east-west through route to Ravensbury Grove Road.
- 3.262 In agreement with speed management however opposed to new pedestrian bridge.
- 3.263 Opposed to additional bridges due to anti-social behaviour.
- 3.264 In agreement however may be need for speed attenuation measures if cycle lane is within carriageway.
- 3.265 Not in agreement with statement that River Wandle is barrier and feels that through passage for pedestrians from Wandle Road is overstated.
- 3.266 Footpaths to nearby tram stops could be safer if they were overlooked by homes however this would require the demolition of the industrial estate and Deer Park Gardens. The need for extended pedestrian routes via Ravensbury and onwards to Wandle Road has been overstated.
- 3.267 Opposed to additional connections Morden Road.
- 3.268 Disagreement back alley is extremely well lit, chicane arrangement prevent motorbikes. Wider footpaths might improve walking experience.
- 3.269 Not in agreement with improvements to movement around the estate. Crossing points should be improved. Improvements to Wandle Trail should not be detrimental to space for residents.
- 3.270 In agreement in general however must be carefully considered. Opposed to new pedestrian bridge.

6.9. **Land use:** Suitable land uses for each neighbourhood.

Land use	Agree/Disagree	%
Agree	8	7.1%
Disagree	9	8%
Mixed	2	1.8%
Neither	3	2.7%
No Response	91	80.5%
Total	113	100%



6.9.1. **Responses from residents of Ravensbury**

- Agree with Land use policy. Do not want any commercial or retail uses on the estate.
- Agree there should be a mix of homes but the height should be no more than three storeys - no 4-storey blocks of flats."
- Do not support anything other than residential use.

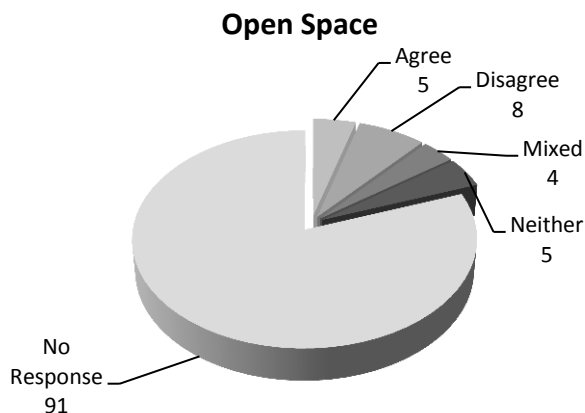
- Strongly Agree.
- Concerns that too dense development will result in overlooking and daylight issues. Serious overshadowing of home and complete loss of privacy in the home and garden.
- Strongly agree to restrict only to residential usage. Retain current mix.
- Supportive of Policy EP R4. Opposed to the addition of retail to the estate. Supports lower densities with higher proportions of socially rented
- Supportive of Policy EP R4. Opposed to the addition of retail to the estate. Supports lower densities with higher proportions of socially rented
- Units/blocks either side of block containing the community hall on Ravensbury Grove Road.
- Supportive of Policy EP R4. Supports lower densities
- Disagree - p158, p.3.277 - if want to retain linear pleasant open space why knock buildings on Ravensbury Grove Road?

6.9.2. Responses from the Ravensbury Residents Association

- a) Agree.
- 3.271 Neither agrees nor disagrees.
- 3.272 Agree.
- 3.273 Disagree- density plan matrix is at odds with the character of Ravensbury.
- 3.274 disagree with the level of choice -suspicious of policy.
- 3.275 Disagree with Ravensbury Estate being used for cycle hire location due to parking demands. Agree with such use in Morden Hall Park.

6.10. **Open space:** The location and type of spaces that should be provided for each neighbourhood.

Open space	Agree/Disagree	%
Agree	5	4.4%
Disagree	8	7.1%
Mixed	4	3.5%
Neither	5	4.4%
No Response	91	80.5%
Total	113	100%



6.10.1. Responses from residents of Ravensbury

- All current green space should be retained
- No on-site play space is necessary as the estate is close to the park and existing playground.

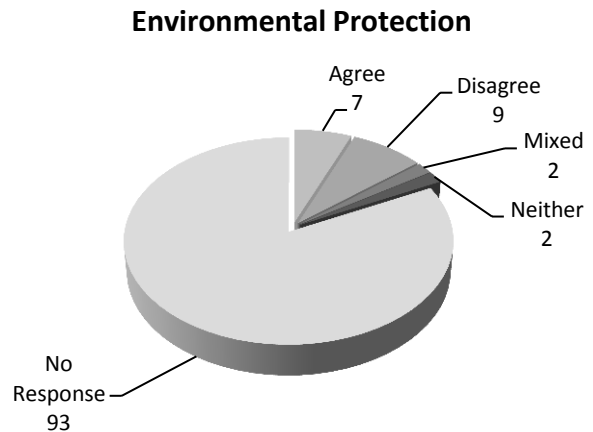
- The estate has a nice open feel with green spaces and trees. The estate is perfectly fine as it is.
- There is no need to include a play area for children as the two parks cater for them."
- Ravensbury Park - letter sent from resident to Circle re: totally unsuitable proposals.
- Generally agree but more details needed.
- Opposed to Policy EP R5 a- c. Supportive of EP R5 d) No need for new public space
- Opposed to Policy EP R5 a) and c). Supportive of EP R5 b) and d) No need for new public space.

6.10.2. Responses from the Ravensbury Residents Association

- b) Agree however swale areas should not result in the loss of green space, residents should be consulted.
- c) Agree however residents living beside play spaces should be consulted.
- Additional car parking spaces - some homes should have two car parking
- 3.276 Agree however would need to be shown possibilities to form opinion.
- 3.277 Agree also please retain mature trees in and around Ravensbury.
- R1 Open Space diagram indicates that residents object to Hengelo Gardens access to Ravensbury park.

6.11. **Environmental protection:** How to maximise opportunities for biodiversity and prevent flooding.

Environmental protection	Agree/Disagree	%
Agree	7	6.2%
Disagree	9	8%
Mixed	2	1.8%
Neither	2	1.8%
No Response	93	82.3%
Total	113	100%



6.11.1. Responses from residents of Ravensbury

- Strongly agree but flood risk not fully appreciated. Larger building footprint increases flood risk. New channel potentially increases flood risk. Do not want reinstatement of historic water channel. Environment Agency development buffer zone between the river and development site is important

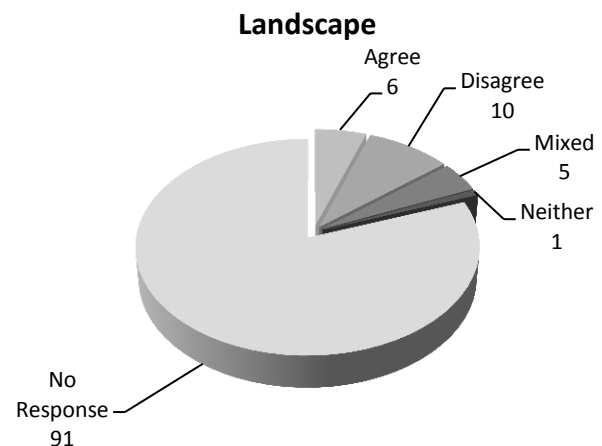
- Believe that reinstating the historic river channel will make flooding worse. Concerned that development of the garages site will increase the risk of flooding.
- Concerned the reinstatement of the historic river channel will increase flood risk
- Concern about flooding and that the new building will impact on the river, particularly the back channel tributary.
- Building on the garages site could make flooding worse.
- Building on the garages site could destroy the habitats of the cranes, woodpeckers and bats that live next to it.
- Opposed to a new bridge. Opposed to 3.288 on the basis that it would increase flooding.
- Supportive of Policy EP R6, no new footbridge wanted. Opposed to 3.288 on the basis that I would increase flooding.
- Opposed to 3.288 (restoration of historic river). Supporting of wildlife habitat improvements.
- Questions the validity of plan with regards to flooding.

6.11.2. Responses from the Ravensbury Residents Association

- a) Resident notes refers to specifically to swales as flood mitigation however policy does not read as such.
- b) Again residents specifically questions the effectiveness of swale however policy includes a range of measures. Green roofs the preferred option.
- c) Agree however want flow routes compared with specifically locations of older person homes.
- d) Residents require consultation of species to be introduced
- e) Comment appears to reinforce policy.
- f) Require clarification on the definition of 'undeveloped'.
- g) Bridge and path propositions in the ELP encroach on habitat, these should be removed to preserve habitat.
- 3.281 Opposed to reinstatement of tributary due to flooding concerns.
- 3. 282 Agree with policy.
- 3.283 Opposed due to concerns about wildlife habitat.
- 3.284 Request to review EA reports.
- 3.285 Agree.
- 3.286 Opposed due to habitat concerns.
- 3.287 Agree however concerns regarding habitat disruption
- R6 annotated map illustrates landscape buffer as significant habitat zone which needs minimum intervention.
- 3.288 Opposed preferred method is to rebuild road bridge.
- 3.289 no comment.
- 3.290 Request to be informed if redevelopment is being considered within 8m strip.

6.12. **Landscape:** How each neighbourhood can use and building upon existing landscape assets to create high quality places.

Landscape	Agree/Disagree	%
Agree	6	5.3%
Disagree	10	8.8%
Mixed	5	4.4%
Neither	1	1%
No Response	91	80.5%
Total	113	100%



6.12.1. Responses from residents of Ravensbury

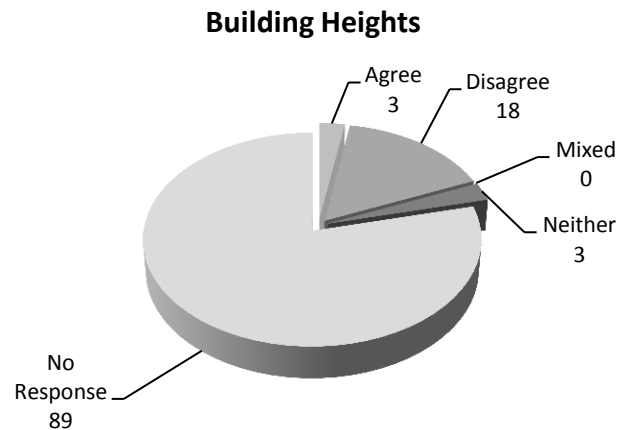
- Agree with parts a, b & d of the policy.
- Part c - widening the park entrance - is not necessary."
- Agree with policy but not about the gateways into Ravensbury Park.
- There are enough entrances into the park and they are wide enough and can be seen just fine."
- Strongly agree but retain existing glade at Ravensbury Grove. Retain as many existing trees as possible. No enhanced access to existing public open space. Agree that proposals should retain existing open spaces. No play spaces - parks exist already. Yes to all houses/flats having garden or amenity space that meet/exceed current standards.
- Opposed to EP R7 c) Supportive of EPR7 d).
- Opposed to EP R7 c) Supportive of EPR7 d).
- Opposed to EP R7 a-b) and c).

6.12.2. Responses from the Ravensbury Residents Association

- a) Agree however concern about excessively linear street layout as indicated by proposals.
- b) Agree
- c) no comment.
- d) Agree however resident should be consulted on tree species.
- 3.291 no comment.
- 3.292 Generally agree with intent to preserve landscape, provides suggestions to increase habitat. Opposed to building heights over 3 storeys.
- 3.293 Opposed to increased accessibility to and along river.
- 3.294 Disagree-residents feel entrances are overlooked. Image provided indicating overlooking.
- 3.296 Generally agree, note regarding the relationship between rear gardens and wildlife habitat.

6.13. **Building heights:** Appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area.

Building heights	Agree/Disagree	%
Agree	3	2.7%
Disagree	18	15.9%
Mixed	0	-
Neither	3	2.7%
No Response	89	78.7%
Total	113	100%



6.13.1. Responses from residents of Ravensbury

- Totally disagree with proposed building heights range.
- My home will be 'towered by 'wrap-around' balconies and multi-storey development suggested.
- My views will be ruined.
- Anything above 2 storeys will affect views and privacy.
- The garages site is higher than the surroundings and 4-storeys is unacceptable here.
- The building proposed for No.54 Ravensbury Grove has been turned by 90 degrees and will now overlook my gardens.
- Disagree with building heights proposal. Heights should be 2 storeys only, particularly on the garages site.
- Anything over 2 storeys will block out our sunlight, Ravensbury Court takes a lot of our natural sunlight already.
- Building heights for Ravensbury Garages are excessive. The current plan with oversized blocks will destroy the skyline. Why allow 4 storey block in area of 2 storey housing where views and prospects are important? Four storeys will appear as five storeys due to the landscape.
- Strongly disagree. Heights should be restricted to 2-3 storeys. Proposals map must include garage areas as these proposals are of a greater height than the rest. No scope for 4 storeys along Ravensbury Park boundary and within Ravensbury Village estate. Of high importance as height will ruin the character and visual amenity.
- No increase in building heights. Three storeys max.

6.13.2. Responses from the Ravensbury Residents Association

- a) Agree note that 3 storeys should be maximum limit with mansard roof / dormer window. Note made regarding importance of retaining mature trees. Images provided of areas with established trees.
- b) Opposed- 3 storeys should be maximum height. Residents note that the garage area of Ravensbury Grove is the highest part of Ravensbury. Annotated map provided which provides resident's guidance on heights.
- 3.297 Agree.
- 3.298 Agree subject to height limit of 3 storeys.
- 3.299 Comments appear to reinforce policy.
- 3.300 Agree.
- R8 annotated building height map provided showing resident's guidance on heights. Residents provided 3D renders of their understanding of the proposals.

7 Response to Policies

The table below summarises the results of respondents' opinions of specific policies within the draft Estates local plan.

Policy	Townscape	Street Network	Movement and Access	Land Use	Open Space	Environmental Protection	Landscape	Building Heights
Number who agree	9 (8%)	4 (3.5%)	5 (4.4%)	8 (7.1%)	5 (4.4%)	7 (6.2%)	6 (5.3%)	3 (2.7%)
Number who disagree	11 (9.7%)	13 (11.5%)	13 (11.5%)	9 (8%)	8 (7.1%)	9 (8%)	10 (8.8%)	18 (15.9%)

Table 3: Number and proportion of respondents who either agree or disagree with specific policies

- 7.1. The response to the policies had a very high no-response rate, at approximately 78%. However, there was a detailed qualitative response, including a 58 page document submitted by the Ravensbury Residents Association.
- 7.2. Of those who answered this section of the consultation, the proportion of those who disagreed with the policies was higher than those who agreed, across all policies.
- 7.3. Disagreement was highest for the policies on Street Network, Movement and Access and Building Heights.

8 Other matters

The following points were raised by respondents during the consultation and relate to the regeneration and its delivery, but not to specific policies in the consultation document.

- Feel that residents' concerns have been overlooked and ignored by the Council and their concerns have not been addressed or answered by the Council.
- Please listen to Tenants on the estate before allowing Circle Housing to destroy our homes.
- Fear of noise and dust from work going on for 10 years.
- The estate has a lovely green, quiet character, due to the green space, wildlife and cul-de-sac. The proposals will mean a complete redesign of the estate which double the number of people, making it busier, noisier and no longer resemble how it is now. It will destroy the character and community feel there is currently.
- Would be happy to continue living on the estate after rebuilding of estate.
- Horrified at the bullying, clumsy and stressful approach to dialogue with residents. Bombarded with technical 'planning' jargon. Upset by 'hard line' attitudes. Confused by frequent repeated mailings. Ravensbury residents are feeling bruised, stressed and distrustful.
- Strongly disagree with proposed bridge between 10 & 11 Hengelo Gardens due to security implications. Suggest using existing bridges. Also note nature conservation status of land adjacent to 11 Hengelo Gardens (correspondence with LBM attached). This should remain untouched. Do not increase security risk to Hengelo Gardens with new park entrance. Need for extension of off-road parking provision.
- Orlit homes are structurally sound. Council consultation is a farce and council have bullied elderly residents into moving.
- Council should send representative to Circle housing consultations.
- Supportive of ; Better transport signage, tidying access points, architectural inspiration from Ravensbury Mill, Surrey Arms and white Cottage, mix of housing, increasing parking whilst protecting greenspace. Suggestions made on potential steps to improve the estate, e.g. keep washing lines, refurbish community hall and increase the number of bin collections.
- Doesn't want property demolished. Not informed of case for regeneration.
- Strongly disagrees with P12 para 2.1 and page 20 paras 2.25-2.26 - no evidence presented as to why regeneration only option? P140 site analysis reveals positive views, landmarks, character; very few negatives so why regenerate?
- Respondent has concerns about reconfiguring the ground floor flats in Ravensbury Court in order for the front doors to face Ravensbury Grove - "seem[s] totally unnecessary and would involve extra cost for leaseholders. There is also concern that an extra vehicular entrance from Morden Road would make the estate a rat run. She says the proposed 288 homes will be too dense and too high. Any means to mitigate flooding should be FULLY investigated.
- It is awful. Disrupting. Not wanted. If the demolition and rebuild of homes and changes to the surrounding area goes ahead, it will increase the amount of people living here, no

one will know neighbours, as they do now and will turn into a 'bad' area with all sorts of nasty people who will change the tranquillity of life here. I choose to live here because it was a 'good' area. Circle wants to segregate the elderly and disabled from other residents, which, I find, is totally disgusting. Shove us in a corner to die! Personally I LOVE being part of Ravensbury the COMMUNITY, with its 'good' neighbours. Circle have been conning residents into answering questions the way they want to hear the answers and not ONE of them actually LISTENING to us residents and they hell bent in going ahead with these disgusting proposals, even though the majority of residents living here don't want ANY of them, including myself. Circle have been totally dishonest, from the outset, when we were being asked questions, at the beginning and have continued to do so all through every consultation. Being too secretive, they should have been more transparent, let us in on 'secret' meetings, etc. to let us learn what real plans they have. I've seen the plans and think they are awful, increasing it way too much. I've heard residents say, and agree with them, 'Land gran', 'to make money', 'it's social cleansing', 'build for profit' and more, even though Circle Housing says it isn't. Plus absolutely NO consideration to the welfare and consideration of what today's residents actually WANT. So I say refurbish and leave us alone to enjoy our lives, as we have been since moving here, some people from 1960's!

- Too Speed.
- “All the plan will do is increasing housing, more families, children, vehicles, noise. It will ruin the whole ethos of the estate as it is now. It will not improve the area just overcrowd it. Elderly people living here at present will be lost in the expansion and lose their present security. Just bring the area up to standard for all present residents then leave us alone!!!”
- No one wants it to go ahead.
- Ravensbury estate is just fine as it is, as far as I am concerned the only reason that regeneration is being considered is for financial gain by (CHMP) because we have good transport links, local schools, local doctor’s surgeries and hospitals, this estate therefore qualifies for a good area for sale of homes.
- Hengelo Gardens should not be demolished. Ravensbury Court should not be demolished. Increase flood defences and protection along River Wandle for Ravensbury Estate.
- Consultation should have been clearer and should have been more open about the long term implications of resident on the estate.
- The document has been a nightmare to complete.
- However thanks for having the drop-in sessions to explain how to fill it in.
- Feels that the design of the booklet has not enabled her to fully voice her opinion for each category, so has had to write within the booklet.
- Respondent did not understand the Estates Local Plan. Points raised were unclear, put together different points which confused respondent. Respondent fee ls that plan was intentionally confusing. The consultations are pointless; at every meeting it’s the same questions, same replies and question dodging no real information being offered.

8.1. Responses from the Ravensbury Residents Association

8.1.1. Other Matters:

- 'Have Your Say' document was poorly designed and difficult for residents to understand. Questions do not reference page numbers in Estates Local Plan. Residents name and address should be near front of document. Table in questionnaire not fit for purpose. Document requires proof-reading.
- Residents queried why the process moves to Stage 2 when response to Stage 1 was opposed to redevelopment. Little mention of Stage 1 in pamphlet.
- Preference for regeneration should include an option for self-build.
- Residents responding to policy on the assumption that option 1 goes ahead despite residents opposition to option 1.
- The response is accompanied by a petition signed 54 residents.

8.1.2. Circle Matters:

- Not a resident led regeneration; residents do not have proper access to design professionals.
- Residents feel method of consultation by Circle Housing officers was arrogant.
- Residents have observed a decline in repairs and maintenance standards which reinforces the housing association argument for regeneration.
- Lack of choice in housing offered to meet family needs.
- Residents note the inclusion of street benches in Circle proposals-concerns regarding anti-social behaviour outside homes, residents should be consulted on the position of benches.
- Residents living beside play spaces should also be consulted. Some residents require 2 parking spaces-this has been dismissed by Circle, explore avenues to meet resident needs.
- Residents have insufficient access to Circle Housing architects during their own consultation.
- Residents would like to review the 8m buffer strip from the River Wandle in Circle Housing proposals for Ravensbury Garages.
- Case for regeneration on the basis of structural faults or environmental deficiencies has been overstated.
- Degree of neglect in regards to proper repairs and maintenance.
- Residents group provided detailed response to CHMP Reports on Ravensbury Estate.

Statutory responses to the London Borough of Merton draft Estates Local Plan

Stage 2 Consultation 1st February 2016 – 18th March 2016

London Borough of Merton

October 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.	Include housing optimisation as an opportunity. 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 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>a) The general building height across the site 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>b) 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>c) 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>d) 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>e) 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 '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.' 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 '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'.</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.
RAVENSBURY ESTATE			
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
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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
Direct e-mail kslplanning@environment-agency.gov.uk



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

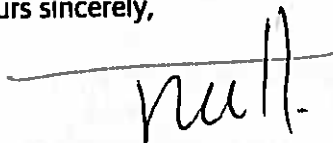
Given the scale, density and likely coordinated delivery of each site, the borough should consider whether there are any specific on-site requirements that could be generated from the potential development, for example, any physical or social infrastructure requirements and for High Path, a reduced car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



SM 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.



Historic England

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



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Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

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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Robert Deanwood
Consultant Town Planner

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n.grid@amecfw.com

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

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Gables House
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CV32 6JX

Ann Holdsworth
Development Liaison Officer, National Grid

ann.holdsworth@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
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CV34 6DA

Yours faithfully

[via email]

Robert Deanwood
Consultant Town Planner

cc. Ann Holdsworth, National Grid

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Registered in England.
No. 2190074



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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~End~

London Borough of Merton

October 2016

