

Response To :

It should be noted that the whole process as of April 21st in respect of the area currently known as High Path Estate is confusing for the majority of residents, neighbours and other interested persons insofar as the the outline planning submission in theory should be considered in the light of present day LB Merton Planning Guidelines as amended by London Mayor's Office considerations at the time of application, whereas the LB Merton Planning Consultation submission in itself creates a framework essentially for the external appearance and landscape usage of the plan area (which at time of main consultation extended beyond the outline planning submission area (by reason of the Nelson Grove Road / High Path Garages block and the Pincott Road Play area, which have been covered by a separate detailed planning application).

I request Merton Council to use all submissions made by myself to the Estates Plan Drafts and subsequents , including e-mails to Circle Housing Representatives and Local Councillors regarding High Path as objections to the outline planning application and as further such objections to Phase 1A High Path Planning application as submission to the Planning Inspector for the Estate Plan Inquiry.

Although I have made detailed submissions, representations and general objections to both documents, clearly for the present stage of LB Merton Estates Plan with respect to High Path there are a few more areas which need highlighting specifically for the appointed inspector. And additionally I take this opportunity to object to the outline planning application submitted by Clarion Housing for the specific demolition of Norfolk House and The Private Garages in Hillborough Close / DeBurgh House.

I would hope that as inspector you would undertake sufficient site visits and speak directly to residents as well as their alleged representatives at borough councillor level, as the whole consultation process I consider flawed , unclear, misleading and designed to generate a pre-determined outcome as to the scale and location of the facilities and residential units etc currently planned, with little scope for meaningful resident participation, although it should be noted that some changes in roofline are welcome from initial presentations. You should also note that in some respects the whole process for residents has been unnecessarily protracted, especially as the main scheme promoter in their initial (and subsequent) presentations had no qualified architectural representatives of sufficient knowledge of the local area nor of meaningful comparatives in terms of internal space or heating requirements and estimated costing to existing residential buildings proposed for demolition nor of how to relate to such buildings as were not planned for demolition (specifically Hubert Close, Rodney Place, 68 Nelson Grove Road, Merton Evangelical (Baptist) Church, The Trafalgar Public House, Martin Harkness House, 25 Abbey Road, 1 Nelson Grove Road, 1 Abbey Road, Kelmscott House, The Dark House PH, South Wimbledon Underground Station / Electrical Substation, The Nelson Arms and adjoining listed parade of shops,offices and flats over.

As planning inspector I would hope that you would review fully all documentation trail of discussions and thought process of Merton Council Officers and the Scheme Promoter, written correspondence with TfL in relation to roads, bus services, taxi ranks and rail stations, and any impact or discussion with educational providers in respect of the proposed secondary school to the south of High Path. I would hope that you would critically examine the original documentation made available on Merton Council Website / Mailed to residents in relation to first stage Estate Plan discussions to be aware of the errors of fact, typing errors and so forth which made any kind of meaningful response difficult to draft and submit.

Of course you may wish to actually review the plan for High Path, caevets above notwithstanding and so there are a few notes further to the comments I have already made.

In respect of community facilities, since the initial presentations things have changed. The community centre at Merton Hall is likely to be closed by Merton Council and transferred by lease to a Pentacostal Christian Church, this will remove the building from the use of the wider community of other faiths or none, as such any proposed Community Centre anywhere on High Path estate would need to consider the management and permitted uses, parking and access (Merton Hall enjoyed a reasonable amount of parking for catering vehicles, staging set up, and similar). The former estate office / police station on Pincott Road is being temporarily transferred to a local community centre management , however Newman Francis in their recommendations stated that it was important to

have an estate centre for the residents of high path – including caretaking, maintenance and cleaning management for example, and you should ensure the plan has sufficient space for this, additionally the outline planning application seeks to demolish the St John's Parish Hall, which while this indeed has a fair use for the established church christian faith issues, and it is not really for me to dictate to how the diocese sees fit to dispose or otherwise seek compensation for the loss of that building/ space I do think it is a good thing for a community facility run and managed by the Church of England as Faith has an important part to play in the community co-hereance and progressive assistance to peoples lives. Therefore the loss of two local community spaces should be balanced sufficiently by on-estate or closely nearby facilities of at least equal usable space.

Office and Industrial /Retail Space.

The financing of this should be challenged, similar developments from Tooting High Street through to Colliers Wood do not seem to let or have a large take – up of users along the high street frontages, the north side of Merton High Street already has completed or proposed applications to change use from retail/office to residential and this trend continues down Kingston Road, even with additional residential units one does not see a great demand for additional retail offerings, given that the likes of national retailers like The Co-op and Boots left Merton High Street in the early 1980s. And the plan for a medium sized furniture retailer in Station Road to replace its premises with residential flats and houses. It is noted that the former lamp factory in Rodney Place until notice to quit to tenants was given had three additional small office based businesses housed affordably there in addition to the main warehousing and storage company of Wisepress, and that on the South of High Path is Domex and two other businesses where additional office space has been sub-let, so , as long as it is affordable there are indications that there could be a market for office / flexible space (including arts studios, photographic and musical studios) The question is would these be better located along High Path (particularary given the proposed Secondary School for the south side of High Path) rather than the residential use proposed for the direct north of High Path , and if so, what is the best use for Merton High Street's south side ?

Existing Housing : Space, Heating Costs, CO2 vs Proposed.

No clear calculations of W/MSq for heat loss through existing walls and lintels has been provided, to work out what marginal annual reduction in CO2 is available, when compared and discounted against the embedded CO2 of existing residential build.

The cost of the proposed community heating plant is unclear and for electricity generation compared with the non-offer of gas is well known that present costs to residents for Gas is about one quarter of that of Electric at present retail prices.

I have made repeated requests and comments that the internal arrangements for the proposed dwelling houses are of less usable dwelling space than existing when combined and viewed with the existing storage and potential for conversion of some storage space to dwelling space should the owners of those houses so desire to do. Furthermore the general arrangements which have been shewn to date do not have separated kitchens and living rooms, something which is a necessary must for child safety for example, additionally all kitchens should have double or twin sinks to meet religious requirements and there should be external of front door storage for shoes (religion) and work-clothes and boots for those of us whom have itinerant industrial/mechanical based work. Furthermore for the flats at Norfolk House and Hilborough Close the layout of these spacious two-bed properties exceeds by about a net 4.0msq my calculation of measurement of the proposed replacement properties, and there a no flats so far as I know in England that are comparable in space to these blocks, as such these should be retained unless proper replacements (in the same location – moving to near the proposed / existing school or onto Morden Road would not be acceptable). Additionally we cannot accept the loss of present ratio of off street parking for the flats nor the loss of the aprons to the garages, which are used as additional storage space for bulk buys of garden goods , kitchen rolls, incontinence pads etc which there is no space in the flats to keep and store.

For the 1 Bedroom flats these are of a good size, and have the arrangement with the separate kitchen and all rooms having separate doored access off a good sized hallway, allowing the living room to be used as sleeping area for family members or friends staying over for short periods, or for assisting refugees or otherwise temporarily homeless persons safe accommodation for a short time, this flexiblilty appears to be lost in the visualisations we have been shown to date. I would accept that the bathrooms of most properties at the present time do not meet width requirements for access by persons in wheelchairs, but if this generates bathroom spaces that are smaller in other existing dimensions then I can prove that the adaptations for less-ambulent people using WC , bath or sink aids / seats is off insufficient space when mapped to the current bathroom layout demonstrated to us so far.

Consultation and Resident Involvement

Please ensure that you view all correspondence from Newman Francis (who I found unbriefed and unprofessional in terms of depth of knowledge), and feedback from Clarion/Circle to Newman Francis on each of the meetings held by Newman Francis and Circle themselves. Feedback from residents and any written instructions or comments, particularly relating to community management and participation in the estate at the present time and any future built form. Many events have been advertised as 'Have Your Say' yet there appeared to be no short-hand or stenographer note-taker or relevant analysis of verbal comments made, this made attending a waste of time.

Roads, Transport, Air Pollution, Pavements and Drainage.

The problem particularly of what Meretune Way and High Path as road/pathways is supposed to be is wholly unclear and does not meet the strategic planning possibilities. Merton High Street and other roads suffer from flooding mainly owing to lack of correct falls in road and paved surfaces to surface gully gratings (which are also blocked and not cleaned – if we arrange a site visit date on a rainy date I can show this to you). This lack of maintenance ill reflects on both Clarion and Merton Council. The amount of air pollution around South Wimbledon must be quite high, and as such is the area suitable to build additional housing at any level without proper traffic manage and flow (indeed part of the South side of Merton High Street was supposed to (Mid 1960s) have grade separated junctions, although the question of listed buildings at South Wimbledon was not addressed, and Meretune Way, supposedly Merton High Street Relief road, has been allowed to be a distributor road for residential and leisure development at Merton Abbey Mills and significant retail at Sainsburys/M&S and Tandem Centre, so it does not work as providing a full – free flowing junction area.

I would note that there are sections of Merton High Street where there is no surface water drainage provided, despite significant renewal of paving and road surface recently, which leads to a large wash of paving by vehicles in times of heavy or prolonged rain. One has to doubt the competence of Merton Planning and Highways teams in effectively assessing basic highways requirements as well as writing correct specifications and proper planning and checking of work programmes.

Landscape, Greenspace and Wildlife

Our variety of natural and man-made environment does generate a mix of urban wildlife- Cats, Squirrels, Foxes, Magpies, Crows, Ravens, Blackbirds, Thrushes Sparrows, Greenfinches, Wagtails, Robins, Jays, Herons, Gulls, Ducks, Snails (any varieties that are unique to the grassed areas of this part of historical Surrey?), Bees, Hoverflies. Plus we have ornamental trees particularly Birch, Plane, Ash, Flowering Cherry and the like. While there is a need to manage these the main proposals seem to gather up all the ground level greenspace and place it north-south in the general centre of the estate. This may look a good thing, but most trees are now 25 to 50years plus of age, and some are better as look-out sites for birds than others. The amount of breeding birds is probably low, due to Cats and nesting birds, and some shrubs are not exactly designed for ground cover, nor high level bat and bird boxes (some may nest in Nelson Gardens and the wildlife corridor Morden Road to Merton Park Tramstop. There is scope to improve ground plants and trees even without redevelopment, and it may be not so good with the 'New London Vernacular' of internal green squares that due to height of surrounding flats do not permit most birds to actually fly into them, due to wind forces. Our birds seem to prefer two to three storeys with TV aerials as lookout posts and song locations, four storey and pitched just do not have them in such numbers, they also in addition to trees, like lamp-post light units but these have recently been replaced with a curved plastic top surface which they cannot get a perch on, particularly in windy weather. Suitable artificial high level perches need to be provided to replace any lost TV reception aerials, and it is needed to ensure that for birds a good food source (plant or small insects etc), and good roosting areas are provided in any public greenspace).

It has recently been reported that for traffic air pollution one of the best aids to reduce the effect at ground level is hedgerows, and again the existing Morden Road and High Path (but not Merton High Street) has allowed 5ft approx high Green and Golden Privat, with some Elder and Hawthorn to grow (original landscaping did not have this, then later to just a foot or so above the dwarf walls), these should be retained or improved.

Flood Plain and Flooding Considerations.

I suppose it is not for nothing that Merton Place and Nelson's Fields were originally known as Moat House Farm, though any dug moat can act as a dew pond, and the present water table is of known depth generally across the site, but the existing surface water drainage is not good, owing to Merton Council and Landowners not clearing surface or foul drains on a consistent and proper basis and laying new tarmac to incorrect falls with rises before gully gratings allowing ponding. Other than this there is no evidence I have seen of particular flooding issues that cannot be abated (Rodney Place is an example where the house thresholds are low but have no flooding of gardens into houses that I am aware of), so Merton Council's present insistence of a 25mm ? Minimum of finished internal floor compared to external ground level I am a little unsure of as this can be a trip-height or difficult for those with walking difficulties. There are some former wells and culverted rivers on site, (although two wells are under new blocks – 1 Abbey Road and 1 Nelson Grove Road). Chamberlain (A Personal History of Merton , 1925), refers to one well as 'The Dipping Hole' but he seems to locate it in a different place to that of me and my mother – for us it is near Martin Harkness House in High Path.

Finance, Compensation and Residents

The compensation calculations seem complex, and in parts contradictory to law, although some aspects seem beneficial to certain occupiers of land.

The basic promise (although to what extent in legal law can this be enforced) Is that anyone (as of what cut-off date?) Who lives in a House, will have a house (does this include bungalow), anyone who lives in a Maisonette will have a Maisonette, and anyone who lives in a Flat will have a flat (the allocation to specific floor level is unclear). However for Private tenants where the landlord is not living in the property it is unclear if the landlord is required to sell, the landlord is not required, or assisted to acquire a comparable property in any new build, Clarion have used the argument that most private tenures are of shorter term (max three years), however I know of people where this is not the case, and they are elderly and fearful of losing their residence on High Path, while the Local Authority may have a statutory requirement to re-house them, where they are renting say, a 2 bed property, I understand the LA is only required to provide a 1 bed if that is sufficient for their needs.

While the present offer for long-term freehold and leasehold residents allows for buy-in to new build of same number of bedrooms, the requirement to invest the 10% disturbance allowance I understand is not legal, and any impact on valuations is currently unclear how this should be resolved. There is also the problem of valuing on a basis of 'as originally built' , which can work in favour as should ignore cracks and other settlement which may increase a theoretical market value, or is home-owner fitted double glazing to be discounted vs original Crittal or Wooden window frames? The main thrust appeared to be against those house-owners who may have converted garages to living accommodation, and where this has been done with all relevant permissions then again I would understand Clarion's offer to be illegal if valued on any basis other than the building as standing at the time of agreed sale, if any. The same would hold true where houses have been split into two flats, or had rear extensions or conservatories built.

Although I previously mentioned for us a 2 bed-flat valuation is difficult to determine, Falcon House in Morden Road and similar in Gladstone Road may look comparable to some flat sizes, for Norfolk House and Hilborough Close there are no similar flats in the area of comparable size, this is also why I object to their demolition without a cast-iron legal agreement that any replacement property must be within an area similar to Abbey Road in terms of traffic flow, with no loss of ground level property , external storage, or internal space measured as running length (length of any wall from its start to its next return or abutment, including door rebates and frames where affixed to walls) of walls no less than existing and running length of internal window cills no less than existing, no smaller door aperture than existing.

Clarion's earlier Phase 1A plan application was criticised by London Mayor Office for not specifying finished floor to finished ceiling height of at least 2500mm which is comparably with our existing 2497mm.

Tenure and Human Rights Considerations

It would be nice to have self-build options (particularly for Nelson Grove Road adj 1 Nelson Grove Road), with flexibly Multi-Generational Home there, but as flat leaseholders how much can we buy in, given that of pensionable age there would be no access to additional funds over the market value of existing flat, hence, poor as the access to our flats are (a platform lift would be nice to have), we are happy with our existing flat, rather than holding out for some future maybe, which at present plans does not even seem to be there.

Additionally although 'Right To Buy' applied equally to houses and flats, as living in a flat we did not have the right to buy the garage in the block we rented in part due to different tenure. Yet our need is as great for a garage, and yes this might in part be used for storage of domestic chattels, bulk buy tinned food, and used as a 'spare' (non-dwelling) room as much as for housing the classic car for its insurance requirements, and indeed the garage was a replacement for a private garage on the site of DeBurgh house which we lost rental of when Merton Council demolished that and the associated houses in that location to build DeBurgh House. It would appear to be a fundamental discrimination to treat a householder with integral garage in providing a house (to at least the minimum size internally and externally as that house including garage) without treating a flat-leaseholder in the same manner, (Right to Quiet Enjoyment of Land), the valuation of the flat needs to be with the reasonable expectation of renting a garage, which is quite a privilege in London – replacement garages elsewhere are not as well built as the Hilborough Close block, with leaking rooves and condensation as well as additional expense and further distance from our existing flat. As such we object to either the demolition of the garages, unless there is proper replacement of similar in any new approved development.

Neighbourhood Character Studies

You should read the LB Merton Neighbourhood Character Studies for adjoining areas, and the draft one for High Path area (pre-estates plan) to assist your understanding of Merton's understanding of its heritage and planning framework. Particular note of the Listed South Wimbledon Station and its setting should be made, although Mayor's office indicated that the area was of itself a sufficient size to 'Create its own character' this would have been based on biased information provided by Merton Council, in so far as the immediately adjoining buildings, some within the logical boundary of the Estate Plan area, particularly Rodney Place were omitted from the documentation submitted to the Mayor of London Offices.

Alternative Proposals

A) Alternatives for the site.

Please generally see emails to local councillors, where I suggested that mansard rooves could be built providing additional living space or new flats, extensions to sides and infills at Norfolk house, Hilborough close in particular. Providing office space to frontages of Marsh, May and Hudson Courts. Extending the terraces of houses at Dowman, Doel and Hayward Closes (some demolition of a few garages needed for that, but new houses would have garages to match similar) Y-Cube development over garages in Hillborough Close similar to Eastfields area would work, and smaller and similar over the ground floor sheds at De Burgh and Norfolk House could work. One would have suggested developing part of the former Nelson Arms Car Park, but this has already been done, and not in a nice, well built, or integrated to existing flats way. You are welcome to visit this development to see what Merton Planning department disasterously approve.

Aa) Alternative Build Heights. Were it not for Rodney Place and 68 Nelson Grove Road, then logically higher buildings could be created around the Pincott Road area, which, if kept on the broad orientations of existing tower blocks would not look out of place. The external banding of existing towers with the render and mid-red brickwork is actually a positive when viewed from a distance and better than the metal windowed all brick properties put together in existing plan. One would not be unhappy with 12 storeys in the central area if well designed and integrated into existing buildings.

B) Alternative Locations for Residential Additional Development

Perhaps the largest ground space is to the North of Meretune Way at Sainsburys/M&S where the car park could have development (and even higher if National Grid put the 25Kv cables into tunnels) of good flats for mix of tenures. Additionally there is wasted airspace to the essentially single storey shopping units at Priory Park and Tandem Retail Centre, Clarion should investigate joint development with the landowners of these places. There is also dead space along Christchurch Road backing Priory Retail Development suitable for housing (although it is a busy trafficked road)

Conclusions

I hope you will take note of my mother's submission to the estate plan (same address as above) as I believe this reflects the opinion of other friends and relatives in the surrounding blocks.

The use of both 'Masterplanning and an Estates Plan' which I hope I have showed is essentially flawed and that the use of 'Design-led and predetermination of 'New London Vernacular' while part concocted by elected borough representatives, is clearly not resident led nor part of a presentation of alternative possibilities, and by Clarion outline planning application for demolition of existing properties generally in their tenure (but not the adjoining flats which restrict the potential for a harmonious development – I note that there is some scope to alter the external elevations of some of the plan flats in particular, but it still remains that the habitable dwelling space for proposed houses and some flats including external storage and gardens remains less than existing and this, along with the loss of existing parking is unacceptable and for this reason the plans should be re-thought and alternatives presented and that the outline planning permission sought be denied even with conditions until the outcome of the Planning Enquiry be completed.

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