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High Path Estate, Merton

Case for Regeneration

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1. Introduction

Background to High Path Estate

- 1.1 High Path Estate is located towards the centre of the London Borough of Merton (LBM), within the Abbey ward, to the south and east of South Wimbledon Tube Station.
- 1.2 With much of the existing Estate built between the 1950s and 1980s, ownership and management of the Estate was acquired by Circle Housing Merton Priory (CHMP), who are part of the wider Circle Housing Group, in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all LBM's council housing stock within Merton, totalling circa 9,500 units. High Path is the largest of the estates within this portfolio.
- 1.3 The Estate currently comprises 608 residential dwellings in a mixture of tower blocks, flats, maisonettes and terraced houses and accommodates a mix of tenures including private ownership (as a result of right to buy) and social rent. The number of storeys across the site ranges from 1 to 12. Surface parking courts and garages provide parking provision on the Estate.
- 1.4 The Estate area totals approximately 7.2 hectares.
- 1.5 Merton High Street establishes the northern boundary of the site, comprising various commercial and retail units. There are two storey residential dwellings to the east of the site, and adjacent to the south eastern boundary of the site are part-single and part-two storey industrial / commercial buildings (The Old Lamp Works). South of the site, on the opposite side of High Path, is a community resource centre and east of this is a two-storey church. Merton Abbey Primary School and a church are also located to the south of the site adjacent to High Path road. To the west are two to four storey houses, with South Wimbledon station located at the north-western corner.

Circle's Vision

- 1.6 CHMP, as part of the wider Circle Housing Group, are one of the biggest Housing Associations in the UK. They strive to do more than just build and manage affordable housing. As an organisation they are firmly committed to seeking to improve and enhance the life chances of their residents and their household members whilst increasing the supply of affordable housing in Merton. This includes the aspiration to address all types of inequality as well as disadvantages in health, employment and training, educational attainment, social and economic disadvantage, financial inclusion and the long term sustainability of the homes under their ownership and management.

- 1.7 When CHMP acquired responsibility for the High Path Estate, as well as all other LBM council housing stock in 2010, CHMP committed to improving the quality of accommodation to at least Decent Homes Merton Standard¹ by 2015 to improve the quality of life for residents of the Estate. However, in working towards this goal, CHMP discovered from initial stock condition surveys and financial planning that significant refurbishment and maintenance work as well as financial investment was required to achieve the necessary standard due to a history of reactive repairs rather than proactive or comprehensive refurbishment. CHMP therefore began a comprehensive review exercise across all their estates within the Borough to determine whether it might be more beneficial and sustainable to replace some of the homes in the poorest condition with new properties, giving consideration to the condition of the properties over a 50 year period based on the length of CHMP's financial modelling.
- 1.8 This process began with analysis of all the CHMP Estates in Merton to determine the impact that upgrading homes to Decent Homes Merton Standard would have. This included consideration of:
- Capacity of existing stock to meet current and future housing needs (e.g. overcrowding, older people, demand for adapted properties, etc.);
 - Condition of the existing stock and historic / projected maintenance issues and costs;
 - Community safety and reported crime; and
 - Indices of deprivation, including super output area level identification of areas in decline.
- 1.9 This work was then augmented by further reviews based on the deliverability of potential regeneration programmes on each of the estates. This review included:
- Scope for increasing the number of homes on site;
 - Access and site constraint issues;
 - Income generation potential and future sales values and demand;
 - Contribution to future housing supply; and
 - Proximity to public transport and other infrastructure.
- 1.10 These two work streams were then combined and clearly identified High Path, Ravensbury and Eastfields as the three Estates within CHMP's ownership with the most viable regeneration potential.
- 1.11 These Estates offers the opportunity for CHMP to explore the potential for creating new, high quality and sustainable affordable housing for the people of Merton, through the regeneration of the existing accommodation at High Path Estate. This in turn, would significantly enhance the

¹ As defined within the HSTA.

lives of the residents on the Estate, helping to overcome inequalities faced by those living within the existing poor quality housing. Further, it would enable the delivery of wider regeneration benefits to the surrounding area.

- 1.12 The same type of scrutiny and approach is being taken forward for Eastfields Estate in Mitcham and Ravensbury Estate in Morden in parallel with High Path.

The Purpose of this Document

- 1.13 Having identified an opportunity to explore the potential for more comprehensive improvements and the intensification to the High Path Estate, as well as the Eastfields Estate and the Ravensbury Estate, CHMP have appointed a technical team of specialists to consider in greater detail whether regeneration is the best option.

- 1.14 The purpose of this document is to set out the findings of the technical work that has been undertaken to date and to demonstrate the economic, social and environmental arguments for and against the “Case for Regeneration” of the High Path Estate, whilst giving equal consideration to reasonable alternative options.

- 1.15 Whilst this document has no formal status or independent statutory weight, it has been developed to form part of the evidence base for LBM’s emerging Estates Plan Development Plan Document (DPD) which will set out the planning policy framework against which regeneration proposals for the Estate will be assessed as part of any future planning application. Therefore, this Case for Regeneration is intended to be an important consideration at the independent examination of the DPD to assist the Inspector in the assessment of whether the submitted DPD is prepared in accordance with legal and procedural requirements and whether the plan is sound, as per Section 20(5) of the Planning and Compulsory Purchase Act 2004 and whether it is, as per the National Planning Policy Framework (NPPF) (March 2012) (paragraph 182):

- “*positively prepared*”;
- “*justified*”;
- “*effective*”; and
- “*consistent with national policy*”.

Format of Document

- 1.16 In order to consider the areas identified above, this document is structured as follows:

- **Section 2** examines the current condition of the housing stock as well as looking at housing need for market and affordable housing across the Borough.

- **Section 3** sets out the three refurbishment and regeneration options considered within this document.
- **Section 4** considers the planning policy context at the national, regional and local levels, against which the options must be considered.
- **Section 5** appraises the options against a range of socio-economic criteria.
- **Section 6** conducts a similar appraisal for a range of environmental and place making criteria.
- **Section 7** provides a summary of the options in terms of economic considerations.
- **Section 8** reviews the public consultation that has been undertaken to date.
- **Section 9** provides the conclusions of the report.

1.17 The Case for Regeneration has been informed by various technical assessments and other studies which can be made available on request.

2. Current Position and Condition of Stock

Reasons for Change

- 2.1 Whilst there is a strong community spirit and many of the residents of the High Path Estate enjoy living on the Estate (evidenced by low turnover of tenants, as well as feedback received from residents, as discussed in greater depth later in this document), the quality and condition of the existing residential stock is in decline and doing nothing is not an option.
- 2.2 Firstly, as mentioned above, CHMP as per the provisions of the HSTA, are required by LBM to refurbish the existing units to at least Decent Homes Merton Standards. Considered on its own, this would not require the demolition or redevelopment of any existing homes, but it would necessitate a significant and expensive programme of works, including new kitchens, bathrooms, doors, windows and other materials and fittings such as insulation and plumbing; however these improvements would not deliver wider sustainability and regeneration benefits. This is discussed in greater detail below.
- 2.3 Secondly, with the necessity for change established and the high costs of refurbishment, the size of High Path and its accessible and strategic location offers an opportunity to consider how redevelopment could enable CHMP to more effectively meet current and future housing needs within LBM, and to make more efficient use of the land, as well as offering significant improvements to South Wimbledon as a place for the benefit of a wide range of people, beyond just CHMP's current tenants.
- 2.4 These issues have helped to shape the Options considered within this document and are analysed in greater depth below.

Housing Need within Merton

- 2.5 As explored within section 3 of this document, the NPPF makes it clear that local authorities should act to “*boost significantly the supply of housing*” and use their evidence base to ensure that their Local Plans meets “*the full, objectively assessed needs for market and affordable housing*” (paragraph 47) within their market area.
- 2.6 At a Borough level, Merton faces increasing demand for both private and affordable housing. Whilst a Housing Needs Survey has been conducted for the current residents of the Estate (and will be discussed in greater detail later in this document) it is also important to consider the overall need for housing and affordable housing within the Borough.

- 2.7 The previous London Plan (July 2011) set LBM a minimum 10 year housing target of 3,200 dwellings, equating to a delivery target of 320 dwellings per annum. This target was increased by 28% in March 2015, when the Further Alterations to the London Plan (FALP) were adopted. The borough is now expected to provide for, and exceed, a minimum of 4,107 additional dwellings (or 411 per annum) over the 10 year plan period until 2025.
- 2.8 Whilst this is an increase, the FALP Inspector's Report did levy criticism that the overall housing target for London within the FALP is at least 6,600 dwellings short of objectively assessed need per annum. The plan was found to be sound, only on the basis that the Greater London Authority (GLA) begins preparation of a new London Plan immediately after the adoption of the FALP. As a result, it could be reasonable to assume that housing targets within the Borough and London will rise again within the next 5 years.
- 2.9 The latest Department for Communities and Local Government (DCLG) household projections to 2039, as published on 12th July 2016, which are identified by National Planning Practice Guidance (PPG) as the starting point for identifying objectively assessed needs for housing, predict an overall household growth of 25,000 (increasing from current population of 84,000 to 109,000) within Merton between 2016 and 2039 (a period of 24 years), which equates to an average increase of 1,041 households per annum, which is over 2.5 times higher than the current FALP target for LBM.
- 2.10 Having regard to the above, there is no doubt that there is a significant need for new housing within the Borough and across London as a whole.

Public Consultation

- 2.11 In addition to the technical assessments on the condition of the existing stock (as explained below), CHMP have committed to an extensive programme of public consultation, including existing residents of the Estate and residents of neighbouring properties, as well as other stakeholders and businesses to identify their concerns with the current condition of the Estate and the wider area, and the aspirations, opportunities and constraints in relation to creating a better quality living environment at High Path Estate.
- 2.12 Between June 2014 and the present, a programme of public consultation events have been held with CHMP's Regeneration Team alongside PRP Architects. Feedback from these events has helped to shape the design Options considered within this Case for Regeneration document.
- 2.13 As emerging regeneration proposals develop, CHMP are fully committed to continuing to consult closely with residents and other stakeholders.

2.14 Further information on the public consultation process and the feedback gained is included at Section 8 of this document.

Existing Condition of Stock

2.15 CHMP have commissioned a number of independent technical surveys to assess the existing condition of the properties on the High Path Estate. Having regard to the technical assessments produced to date, a summary of the stock condition is included below.

Structural Condition

2.16 Ellis and Moore Consulting Engineers Ltd produced a Structural Engineers Report (November 2010) to consider the condition of the existing stock at High Path Estate via a visual inspection of all the external elevations as well as internal inspection of a selected number of properties.

2.17 Given the size and incremental development of the existing stock on the Estate, there are a wide variety of property types. Generally, the majority of properties are externally in reasonable structural condition; however, some defects are highlighted below.

2.18 On some tower blocks, work is required to be undertaken on the concrete upstand and to the render which covers the concrete.

2.19 On the mansion blocks, whilst in reasonable condition, work will be required to repair cracking within concrete edge beams and in the deck access slabs. Further work is likely to be required in the medium term.

2.20 Similarly, on the 1960s blocks, work is required to the edge beams and lintels.

2.21 On the 1970's blocks, some display a need for works to repair and replace brickwork. Comprehensive repointing will also be required in the medium term, alongside work to repair or replace beams, slabs and exposed finish.

2.22 The 1980s blocks have similar issues with respect to pointing.

2.23 Internally, the survey highlighted problems in a number of properties in connection with damp, condensation, and rust.

Dwelling Condition Appraisal

2.24 A Dwelling Condition Appraisal has been undertaken by Property Performance Services (PPS) in November 2015 to conduct a visual assessment and consider the condition of the existing properties, reviewing 21 representative properties within the Estate.

2.25 A brief summary of issues raised within some of the reviewed areas are included below:

- Roofs
 - The asphalt flat roofs on the tower blocks are approaching the end of their life and will require replacement in the short to medium term. The thermal performance of these roof areas are considered to be low.
 - The majority of roofs on the Estate are pitched and based on typical lifespans, these will need to be replaced in the medium term.
- External doors and windows
 - Whilst the majority of properties on the Estate appear to have received major project works to replace windows at some point in the last 10 years, it is likely that they will require a major overhaul / replacement in the next 15 to 20 years.
 - A limited number of properties have Crittal framed type windows which are considered to be in poor to serviceable condition.
 - UPVC doors and screens are likely to need replacement in the next 10 to 15 years.
- Internal common areas
 - Regular redecoration is required on a circa 5 to 7 year cycle.
- Kitchens
 - Significant variation across the Estate, however the majority of kitchens were in serviceable condition.
- Bathrooms
 - Again, quality and condition of bathrooms and their associated fixtures and fittings varies significantly across the Estate, however the majority are in serviceable condition.

2.26 With regard to internal space standards, from the selection of properties surveyed, the following table offers a summary of the existing unit sizes compared to the new Nationally Described Space Standard, introduced by the DCLG on 27th March, and reflected within the draft GLA's draft Housing Standards (Minor Alterations to the London Plan) (May 2015).

Unit Size	Existing Floorspace	Nationally Described Space Standard	Variation
1 bed flat	49 sqm	50 sqm (1b2p 1	-1 sqm

		storey)	
2 bed flat	64 sqm	70 sqm (2b4p 1 storey)	-6 sqm
3 bed flat	77 sqm	86 sqm (3b5p 1 storey)	-9 sqm
2 bed house	88 sqm	79 sqm (2b4p 2 storey)	+9 sqm
3 bed townhouse	95 sqm	99 sqm (3b5p 3 storey)	-4 sqm

2.27 As the table above demonstrates, the sample of properties included shows that the majority of existing dwellings types are below the Nationally Described Space Standards for new dwellings.

2.28 With regard to external private amenity space standards, a selection of existing properties were surveyed. The findings were as follows:

- 1 bedroom flat (10 May Court) - 2.8 sqm (balcony)
- 2 bedroom flat (25 Hudson Court) - 2.3 sqm (balcony)
- 2 bedroom flat (23 Ramsey House) - 0 sqm
- 2 bedroom maisonette (5 Doel Close) - 22 sqm (terrace)
- 3 bedroom flat (33 Priory Close) - 0 sqm
- 3 bedroom townhouse (15 Dowman Close) - 28.2 sqm (rear garden)

2.29 From this sample of properties, it is clear that many of the existing dwellings fall under the minimum level of private amenity space specified for new dwellings within the London Plan at 5 sqm for 1 bedroom flats and 7 sqm for 2 bedroom flats.

2.30 In order to achieve a 10% internal inspection rate across all unit types, Baily Garner LLP undertook further internal surveys in late 2015 for a number of units at Beckett Close, DeBurgh House, Eleanor House, Gilbert House, Hayward House, Hudson Court, Lovell House, Marsh Court, May Court, Merton Place, Norfolk House, Priory Close, Ramsey Close, Ryder House, Tanner House, Vanguard House and Will Miles Court. When accounting for the previous properties that were surveyed, it was observed that 18% of the kitchens and 29% of bathrooms were old and in poor condition. During the more recent surveys, it was observed that 6% of heating installations and 23% of the electrical installations were identified as old and in poor condition. The general observations found damp and mould issues were present across many blocks, which indicates that units are potentially affected by inherent 'cold bridging' issues related to the fabric of the buildings. Residents also noted issues relating to the sound performance of the buildings, both from external sources and transfer between properties.

Energy Performance

- 2.31 The Dwelling Condition Appraisal notes that the form of building construction used for many of the existing properties is considered to have a “low” thermal performance compared to current day standards.
- 2.32 The external fabric of most of the blocks contain a number of thermal bridges / cold bridges which offer low resistance to the passage of heat. These can result in localised cold areas where condensation and possible resultant mould growth forms.
- 2.33 One example of this is in 65 May Court which has a considerable mould problem which will be difficult to address without remedial works and improvements to the building fabric, heating and ventilation services.

Accessibility

- 2.34 An Accessibility Audit and Appraisal was prepared by Proudlock Associates (October 2014) to consider how well the existing properties and environment on the Estate performs in terms of access and ease of use by a wide range of potential users, in particular but not limited to that of disabled people. This work has been undertaken in accordance with Lifetime Homes Standards (2010), Part M of the Building Regulations and the Wheelchair Housing Design Guide.
- 2.35 With regard to car parking and approaches, the volume of current car parking is generally adequate; however, its design does not provide the required level of inclusivity or accessibility. The surroundings of buildings are nominally level however many approaches are uneven and require work. Where there are steps, these lack basic features such as handrails and there is no tactile paving.
- 2.36 Examining main building entrances, they are generally of an adequate width; however, many have heavy doors that lack assistance for opening and closing. Level access is only available on the tower blocks and to one single bungalow. The steps on other buildings appear to be unnecessary but make wheelchair access particularly difficult if not impossible. Entrances with security control pads / intercoms are mostly positioned too high for some wheelchair users and some other disabled people.

Asbestos

- 2.37 A full Refurbishment and Demolition Asbestos Survey has not yet been conducted, however Property Performance Services (PPS) have reported within their Dwelling Condition Assessment (November 2014) that from their experience of similar building types, it is likely that some asbestos bearing products may have been used in the construction of the properties.

3. The Options

3.1 Based on a range of considerations including the requirements within the HSTA and the existing condition of the housing stock at High Path Estate and the inefficiencies on this Estate, three Options have been identified for consideration within this document.

3.2 These Options are:

- **Option 1 – Refurbishment to Decent Homes (Merton Standard)**

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

- **Option 2 – Refurbishment to an Enhanced Standard; and**

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

- **Option 3 – Full Redevelopment / Regeneration**

- Demolish all existing buildings on the Estate and redevelopment of the site to provide higher density, new modern, energy efficient and high quality homes, alongside commercial / community space, open space, landscaping and car parking.

3.3 No consideration has been given to a “do nothing” approach. Aside from CHMP’s own commitments to improving the quality of life of its tenants, under the provision of the HSTA with LBM, CHMP are legally bound to refurbish the condition of the existing stock at High Path Estate as a minimum. This means that “do nothing” is not a justifiable choice that is open to CHMP and accordingly, it is not considered further within this document.

3.4 Following consideration, CHMP have taken the decision not to consider an Option for the partial regeneration of High Path Estate (i.e. demolishing some buildings to make way for redevelopment as well as retaining some existing properties for refurbishment). This decision has been taken for a number of site specific factors. Firstly, construction of the existing buildings at High Path has taken place over a number of years and includes various different property types, scattered throughout the Estate. Whilst parts of the Estate are in worse

condition than others, the way that the buildings are interspersed makes any partial regeneration scheme proposing demolition of selected blocks very challenging logistically and would cause significant disruption to residents living elsewhere on the Estate from being in close proximity to noise, dust and the general disturbance of demolition and construction works. Secondly, the layout and urban design of the existing Estate is identified (as discussed below) as being poor and retaining any of the existing properties would not offer the best opportunity to deliver a comprehensive well thought through high quality residential development that optimises the potential of the land within the Estate. Thirdly, a scheme of partial regeneration would create a fragmentation of the Estate in terms of design and would not realise the significant place making potential that exists with a comprehensive redevelopment of this significant site within South Wimbledon. Therefore, it is not considered that a partial regeneration option would be “justified” or “effective” and would therefore not meet the soundness test of paragraph 182 of the NPPF.

3.5 The following sections of this document consider the pros and cons of each of the Options above against the following range of criteria to consider whether there is a Case for Regeneration. The content of these sections has been informed by the key recommendations for an effective decision-making process, as set out within the London Assembly’s *“Knock it Down or Do it Up? The Challenge of Estate Regeneration”* published in February 2015.

- **Planning Policy**
 - Including the policy backdrop at national, regional and local levels for the provision of good quality residential accommodation and regeneration.

- **Socio-Economic Factors**
 - Including housing needs of existing residents, socio-economic assessment and economic benefits.

- **Environmental and Place Making Factors**
 - Including social infrastructure and non-residential land uses, urban design, sustainability, energy, flood risk and geotechnical and geoenvironmental issues.

- **Economic Considerations**
 - Including commentary on the economic consideration of each Option based on information within ongoing financial modelling work being undertaken by CHMP.

- **Public Consultation**
 - Including a summary of the extensive public consultation exercises, and the feedback received, that have taken place to understand existing residents’ lived experience and their aspirations for the Estate.

3.6 Once each of these areas has been considered in turn, our conclusions section provides a summary.

4. Considering the Options: Planning Policy Context

Introduction

- 4.1 The purpose of this section is to provide a high level overview of the policy backdrop at national, regional and local levels, against which the Options for the High Path Estate must be considered.

National Policy

- 4.2 At a national level, the principal policy document is the NPPF, and the associated up-to-date guidance provided within the PPG, both published by the DCLG.
- 4.3 The “*golden thread*” of the NPPF in terms of both plan-making and decision-taking is a presumption in favour of sustainable development (paragraph 14). Sustainable development is defined as having three dimensions: economic, social and environmental. Focussing on the social role, sustainable development should help to support “*strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being*” (paragraph 7).
- 4.4 The NPPF (paragraph 47) states that local authorities should act to “*boost significantly the supply of housing*” and use their evidence base to ensure that Local Plan documents meet “*the full, objectively assessed needs for market and affordable housing.*”
- 4.5 The NPPF goes on to state, at paragraph 50, that in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should “*plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community ...*”
- 4.6 Section 7 of the NPPF (paragraphs 56 to 68), ‘Requiring Good Design’, emphasises the importance of good design as a “*key aspect of sustainable development*” and acknowledges its ability to contribute positively to making places better for people. This is closely linked to Section 8 (paragraphs 69 to 78), ‘Promoting Healthy Communities’, which requires planning policies and decisions to aim to achieve places which promote opportunities for interaction between different groups within the community, safe and accessible environments where crime

and disorder and the fear of crime, do not undermine quality of life or community cohesion, and safe and accessible developments containing high quality public space.

- 4.7 Paragraph 111 states that planning policies and decisions should “*encourage the effective use of land by re-using land that has been previously developed (brownfield land)*” provided it is not of high environmental value.
- 4.8 In summary, national policy is clear that steps should be taken to increase the supply, choice and quality of housing and for that reason Option 3 (full regeneration) is considered to be significantly more beneficial than Options 1 and 2, as it is the only Option that would materially increase the quantity and improve the choice of residential accommodation, alongside significant improvements to place making in the South Wimbledon area.

Regional Policy

- 4.9 At a regional level, the most recent version of the London Plan (March 2016, consolidated with alterations since 2011) published by the GLA, sets the strategic framework for planning within London and it forms part of the Development Plan for the Estate. It is therefore an important consideration in the Case for Regeneration.
- 4.10 Linked with setting the housing targets for all London Boroughs, as discussed above, the London Plan (paragraph 1.48) recognises the need to plan for substantial population growth to ensure that London “*has the homes, jobs services, infrastructure and opportunities a growing and ever more diverse population requires*” in ways that “*do not worsen quality of life for London as a whole*” and “*make the best use of land that is currently vacant or under-used.*”
- 4.11 Policy 2.14, ‘Areas for Regeneration’, states that “*Boroughs should identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing, in locally-based plans, strategies and policy instruments such as LDFs and community strategies. These plans should resist loss of housing, including affordable housing, in individual regeneration areas unless it is replaced by better quality accommodation, providing at least an equivalent floorspace.*”
- 4.12 Acknowledging that “*London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford*” (Paragraph 3.13) Policy 3.3, ‘Increasing Housing Supply’, seeks Boroughs to achieve and exceed the relevant minimum housing target, as discussed above. In particular, to boost housing supply, the same Policy urges Boroughs to look towards the potential to realise brownfield housing capacity through a series of measures including intensification and sensitive renewal of existing residential areas.

- 4.13 Policy 3.4, 'Optimising Housing Potential', states that taking into account local context and character, "*development should optimise housing output*" and proposals which compromise this "*should be resisted.*"
- 4.14 Policy 3.8, 'Housing Choice', emphasises that "*Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.*"
- 4.15 Policy 3.9, 'Mixed and Balanced Communities', extends this message and emphasises that "*communities mixed and balanced by tenure and household income should be promoted across London ... which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods.*" The same policy goes on to state that "*A more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.*"
- 4.16 Policy 3.14, 'Existing Housing', states that Borough should "*promote efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings.*" The supporting text to this Policy notes that existing housing should be retained where possible and appropriate, except where there are acceptable plans for its replacement. It also states that estate renewal should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area, and the amount of affordable housing intended to be provided elsewhere in the Borough. Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing.
- 4.17 Furthermore, the GLA's Housing Supplementary Planning Guidance (SPG) (March 2016) reinforces the point that there should be an equivalent level of affordable housing floorspace provided as part of any regeneration. (Paragraph 5.1.18). Importantly, Paragraph 5.1.16 supports the provision of market housing on estate renewal schemes by stating that "to achieve no net loss, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision, or to achieve a more mixed and balanced community."
- 4.18 Policy 7.7, 'Location and Design of Tall and Large Buildings', states that Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. They should not unacceptably harm their surroundings and should make a significant contribution to local regeneration.

4.19 In summary, regional policy seeks to optimise sites to boost the supply of housing whilst offering a greater diversity of tenure and improving the quality of accommodation. All Options considered within this report would increase the quality of residential accommodation being offered; however, only Option 3 would assist with increasing quantity, mix and quality of the external environment. Therefore, Option 3 is considered to be the most preferable in terms of regional policy. Regional policy also supports local authorities in identifying regeneration areas to deliver such objectives. For High Path Estate, as well as Eastfields and Ravensbury, this would be done through the emerging Estates Plan DPD.

Local Policy

4.20 LBM's principal Development Plan Documents (DPDs) are their Core Planning Strategy (July 2011) and their Sites and Policies Plan (July 2014).

4.21 Paragraphs 5.2 and 5.3 of the Core Strategy identify that inequalities within Merton, including housing choices, need to be reduced and that a joined up approach with physical regeneration and other measures outside of planning will help to do this. Within the Colliers Wood and South Wimbledon Sub-Area, South Wimbledon is identified as an area where LBM wish to improve the quality of residential accommodation. The western edge of the High Path Estate, along Morden Road is also specifically identified as an area targeted for improvements to public realm.

4.22 The theme of boosting housing supply is carried through into Strategic Objective 3 of the Core Strategy, which is "*To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.*" This will be achieved by a range of actions including through the delivery of higher density new homes that respect and enhance the local character of the area.

4.23 High Path Estate, although not specifically designated within the Sites and Policies Plan for any particular land use, does fall within the Colliers Wood and South Wimbledon Sub-Area of the Core Strategy where it is generally identified as a residential area.

4.24 Core Strategy Policy CS9, 'Housing Provision', states that LBM will support the provision of well designed housing located to create socially mixed and sustainable neighbourhoods, including the redevelopment of poor quality existing housing and not supporting proposals that result in a net loss of residential units, or net loss of affordable housing units.

4.25 In summary, LBM's adopted policy documents are supportive of the delivery of new homes via the redevelopment and regeneration of existing poor quality housing within existing residential areas to create more mixed and balanced neighbourhoods. For this reason, Option 3 is considered to offer the most appropriate strategy in terms of local policy.

Conclusions

- 4.26 As summarised above, Option 3 is considered to be the most appropriate in terms of delivering key policy objectives at national, regional and local levels as it is the only Option that is able to deliver significant increases in the quality and quantity of residential accommodation, as well as improvements to the general environment of the High Path Estate. Option 3 should therefore be considered as “positively prepared”, “justified” and “consistent with national policy” (as discussed above, in particular NPPF paragraph 47 and 50). Whilst Options 1 and 2 would improve the quality of the existing stock, the longevity of the improvements would be limited before the condition begins to decline again (and significant further investment is required again). Refurbishment works alone offer very limited potential to optimise the housing potential of High Path as a whole.
- 4.27 The general principle of estate regeneration in London is already supported by regional policy, which encourages the London Boroughs to identify specific opportunities through their development plans. Therefore, this gives LBM the opportunity to create site specific policy support for the regeneration of High Path Estate (alongside Eastfields and Ravensbury) within the emerging Estates Plan DPD.
- 4.28 The first stage of this emerging document was a public consultation held between September and November 2014, during which LBM invited residents, businesses and any other interested parties for their views on emerging proposals for the three Estates. Following on from Stage 1 consultation of the emerging Estates Plan DPD, using the background research, responses and other key considerations (e.g. national and regional planning policies) LBM has drafted the Estates Local Plan DPD to guide regeneration proposals that may come forward for the three estates. Subsequently, LBM has undertaken Stage 2 consultation from 1st February 2016 to 18th March 2016 on the proposed Estates Plan DPD.
- 4.29 More details on this process and the responses received by LBM are available on the Authority’s website, on the Estates Plan page².

² <http://www.merton.gov.uk/environment/planning/planningpolicy/localplan/estatesplan.htm>

5. Considering the Options: Socio-Economic Factors

Introduction

- 5.1 Having examined the policy backdrop for considering the Options, this section of the document now turns to consider the costs and benefits of each Option against a range of socio-economic factors.

Housing Needs

Wider Context

- 5.2 One of the key messages in both planning policy and within CHMP's vision is to provide good quality homes that meet the needs of the local population for both market and affordable housing. As illustrated above, this is set against a backdrop of ever increasing housing need within Merton, and the wider London region.
- 5.3 To get a better understanding of the housing need of the existing residents within the Estate and to determine whether the current accommodation is suitable to meet current and future housing needs with regard to size, tenure and specification, CHMP commissioned HDH Planning and Development Ltd to prepare a Housing Needs Study (March 2015).
- 5.4 The existing dwelling stock within High Path Estate is 58.7% affordable housing and comprises the following overall size mix:
- 32.4% - 1 bedroom;
 - 45.9% - 2 bedroom;
 - 21.4% - 3 bedroom; and
 - 0.3% - 4 or more bedroom.
- 5.5 With the report indicating that the mean gross annual household income from the High Path is £27,756, which is 35.3% below the London equivalent (£42,878), it is clear that there is still a significant need for affordable housing, particularly set against a 35% rise in mean property prices within LBM between 2008 and 2013 and an average price gap between social rent and market rent properties of 251% across properties of 1 to 4 bedrooms within the High Path area.

Existing Affordable Housing Need within the Estate

- 5.6 Turning specifically to affordable housing need within the High Path Estate, Table 4.1 of the Housing Needs Study indicates that there is a current total of 357 existing households within the Estate who live in unsuitable housing. The most common specific reason for unsuitability of existing accommodation is overcrowding, which, as recognised within the PPG, indicates a need for more housing units.

Newly Arising Affordable Housing Need

- 5.7 HDH estimate that, using authority-wide household formation rates applied to population information for High Path itself, 15 new households will form per year from the existing population of the High Path Estate, which represents a household formation rate of 2.5%, which is higher than Merton as a whole, at 2.3%. Assuming that these households will be of a similar composition as the profile for new households recorded in the English Housing Survey, 73.3% of these households would be unable to afford market housing in the High Path area. Whilst these households are likely to include some single person households aged 35 and under, which are deemed suitable to form part of a shared household should affordable accommodation not be available for them, this does again indicate a requirement for affordable housing better suited to current requirements within the local area.
- 5.8 Furthermore, on the basis of the PPG guidance on deriving existing households falling into affordable housing need, a comparison of waiting lists across Merton between 2011 and 2014 indicate that there is an average additional 910 households per year requiring affordable housing. Proportionally applied to the High Path area, this indicates a newly arising need of 29 households per year within the study area.

Availability of Affordable Housing

- 5.9 CHMP reports a vacancy rate of just 0.2% within its stock, which indicates there is no practical opportunity to bring any vacant dwellings back into occupation.
- 5.10 Turnover is relatively low within the social rented units within High Path Estate, with on average just 24 lettings becoming available each year, based on trends from 2011 to 2014.
- 5.11 With regard to intermediate housing, there is no stock in High Path at the moment.

Conclusions

- 5.12 From the assessment work undertaken by HDH it is evident that the housing needs of the existing residents of the High Path Estate are very different to the volume of units and mix of

properties that are currently within the Estate. This leads HDH to conclude that regeneration (equating to Option 3) would be a solution as it would 1) provide better housing for the current population but 2) also allow the site to help deliver more housing to meet future needs for market and affordable housing.

5.13 From this assessment it is clear that Option 3 (regeneration) is the preferred option in terms of meeting existing and future housing needs, as it is the only Option that allows both an increase in the quality and quantity of housing on the Estate. It also allows the size and tenure mix of the affordable housing within the Estate to be tailored to meet existing and projected housing needs, rather than relying on stock designed to meet needs dating back to the 1950s. This makes it the most “positively prepared”, “justified” and “consistent” Option of the three. Whilst there could be an opportunity under Options 1 and 2 for CHMP to rebalance the tenure mix within the Estate, refurbishment alone does not provide any scope for increasing the overall volume of the accommodation or altering the mix of unit sizes.

5.14 In conclusion, it is considered that Option 3 is preferable to both Options 1 and 2 for meeting existing and future housing needs.

Socio-Economic Profile of the Estate

5.15 Peter Brett Associates (PBA) were instructed by CHMP to produce a Socio-Economic Analysis Report (July 2015) to consider the wider socio-economic effects that refurbishment and regeneration could have.

Baseline

5.16 The following baseline figures are identified within the Report:

- Only 73% of adults of working age in the Estate are economically active, compared to the Abbey ward as a whole at 84%.
- Net weekly household income (after housing expenses) is around £390 compared to a national average of about £423.
- According to the Census (2011), 18% of the working age population within the Lower Super Output Area hold no qualifications, which is significantly above the LBM average of 6%.
- At Lower Super Output Area level, High Path ranks as within the top 30% most deprived output areas nationally in terms of the quality of living environment, however within London, Merton is within the top five least deprived Boroughs.

5.17 The Analysis Report also notes that the site is very accessible and well served by transport links, social infrastructure including schools, retail and leisure and community facilities.

- 5.18 From the Report, it can be concluded that regeneration (i.e. Option 3) is likely to have a positive effect on socio-economic inequalities identified above. Regeneration of the Estate allows an increased volume of purpose built housing stock to be built which could play a significant role in reducing deprivation levels. The opportunity to diversify housing mix, type and size to meet current needs means that a broader cross section of needs of various groups within the community, including young people, elderly and vulnerable groups can be met locally, without them needing to move away to find suitable accommodation. Regeneration also offers an opportunity to address the balance of tenures to create a sustainable mixed and balanced community in accordance with policy requirements. It should also be noted that regeneration offers the greatest opportunity to give more detailed consideration to positive health impacts of living in better quality residential accommodation through the evolution of the regeneration proposals, taking account of the Mayor's Social Infrastructure SPD (May 2015).
- 5.19 Whilst Options 1 and 2 would also have a positive benefit through their refurbishment of the existing accommodation, maintaining the same unit numbers and sizes albeit at a better quality will improve quality of life for residents and is likely to reduce levels of deprivation, they do not offer the same levels of benefits.
- 5.20 Accordingly, it is considered that Option 3 presents the greatest benefit in terms of improving socio-economic conditions for existing residents of the Estate.

Economic Benefits

- 5.21 PBA's Socio-Economic Analysis Report also gives consideration to wider economic benefits for the local area as a result of the Options.
- 5.22 During the refurbishment of the existing properties within Options 1 and 2, jobs would be created within the local area positively impacting a variety of residents in the local area, predominantly in trades and services including the potential for apprenticeships for young people to boost skills and qualifications. During this programme of refurbishments, local businesses such as cafes and shops are likely to benefit from a larger customer base and increased consumer expenditure.
- 5.23 Option 3 also offers this benefit, but due to an extensive programme of construction, likely to take place over the majority of a decade, the extent of the benefits are likely to be much more significant, opening up job opportunities to managerial and supervisory construction positions for more experienced members of the workforce over a longer period of time.
- 5.24 The creation of new and additional units and floorspace would provide LBM with funds via the New Homes Bonus, as well as S106 and the Community Infrastructure Levy (CIL) which could

be used to fund new facilities or improvements to existing infrastructure within the area, to the benefit of local and wider borough residents, including education provision, leisure centres, libraries, open space improvements and Tramlink improvements and extensions.

- 5.25 Similarly an increase in overall unit numbers, as well as an increase in the quantity of private accommodation is likely to boost local spending power and trigger increased demand for local amenities and facilities such as cafes, restaurants and shops to cater for local demand.
- 5.26 Furthermore, a comprehensive programme of regeneration also offers the opportunity for CHMP to explore the potential with LBM for incorporating non-residential land uses around the perimeter of the Estate, providing appropriate active frontages onto Merton High Street and Morden Road. This would be likely to increase employment opportunities, further increase footfall and spending power in the local area, to the benefit of local shops and services.
- 5.27 For these reasons, Option 3 is considered to be preferable to both Options 1 and 2.

Disruption to Residents

CHMP are giving active consideration to how disruption can be reduced to the Estate residents. All three Options would result in disruption to existing residents during construction works. Whilst Option 3 is likely to result in the most disruption as a result of the need for resident decant and the length of the construction programme, a detailed decanting strategy is being devised through consideration of phasing and housing needs. This will ensure that the decant strategy minimises the need for residents to move away, and to double decant; therefore, minimising disruption. Options 1 and 2 would still result in disruption to residents whilst works are being undertaken.

Conclusions

- 5.28 Taking into account wider socio-economic factors, including housing need, socio-economic indicators including income and deprivation as well as economic benefits through increased spending power, the analysis above is clear that Option 3 is preferable to Options 1 and 2 and represents the most “justified” strategy that is “positively prepared” to meet objectively assessed development requirements. Principally this is driven by the benefits associated with increasing the quality and quantity of accommodation, and not just refurbishing the existing affordable housing stock which is becoming increasingly outdated and failing to meet current and future housing needs. Although development will come at a financial cost to CHMP, as will be discussed later, it also brings multiple benefits to the Estate residents and wider local community in terms of job opportunities, increased spending power and funds for the improvement of local services and facilities.

6. Considering the Options: Environmental and Place Making Factors

Introduction

- 6.1 Continuing broadly in line with the recommendations from the London Assembly's 2015 report, this document now turns to examine the costs and benefits of each Option in terms of a range of environmental and place making factors.

Social Infrastructure and Non-Residential Land Uses

- 6.2 Given the requirement to focus funding within Options 1 and 2 towards priority areas of the Estate, i.e. residential properties, it is not proposed to create any new non-residential floorspace under either of these Options and it is unlikely that any significant funding would be available for the upgrade or enhancement of the existing facilities on the Estate.
- 6.3 Given the proximity of High Path Estate to the shops and facilities along Merton High Street and Morden Road on the opposite side of the road from the Estate and the potential extension of Transport for London tram services to South Wimbledon, regeneration through Option 3 presents an opportunity to truly integrate the High Path Estate into the surrounding area and to potentially enhance the commercial / community space offer within South Wimbledon. It offers the opportunity to include non-residential floorspace along Morden Road and Merton High Street at ground floor level, and potentially above, to deliver new commercial, retail and community services for the benefit of all people living in the South Wimbledon area. This offer would compliment rather than compete with nearby town centres such as Colliers Wood.
- 6.4 This would have a beneficial knock on effect for existing businesses via increased footfall and visitors to the area, attracted by the wider retail, commercial and community offer.
- 6.5 As discussed in the previous section in consideration of socio-economic factors, the creation of new residential floorspace would also provide LBM with funds via the New Homes Bonus, as well as S106 and the Community Infrastructure Levy (CIL) which could be used to fund the provision of new or improvements to existing social infrastructure within the area, to the benefit of all local residents (on and off the Estate).
- 6.6 On this basis, Option 3 is considered to be significantly preferable for both the residents of the Estate and for the wider local population due to the significant place making benefits it could have for South Wimbledon through an increased non-residential floorspace offer.

Urban Design

- 6.7 Sue McGlynn Urban Design Ltd (SMUD) were commissioned by CHMP to produce an Urban Design Review Study (October 2014) to consider the quality of the built environment within High Path against established principles of urban design, excluding valued judgements on aesthetic or architectural styles.
- 6.8 Given that the works proposed under Option 1 would not involve any external works to the existing properties, it is not considered to have any material effect on the urban structure, layout or quality of the external environment. Accordingly, Option 1 is not considered in detail within this section.
- 6.9 For similar reasons, Option 2 is not considered in detail due to the limited external works it proposes, however, it is discussed at high level.

Urban Structure – Integration and Connectivity

- 6.10 With regard to the urban structure of the area, the study considered:
- **Integration of the Estate into the wider area** – to consider the extent to which residents have access to public transport and all the other opportunities that living in a capital city offers, as a significant indicator of life chances; and
 - **Connectivity to routes in and around the site** – which indicates the ease of pedestrian access and the convenience, and the feeling of safety and familiarity moving around the immediate area. The ability to understand how a particular route links to other routes has been found to be a key factor in developing a “picture” and sense of place. Poorly connected routes make navigation more difficult.
- 6.11 Using Space Syntax theory, the study found that in terms of integration with the wider Borough, High Path is well-located strategically, with strong links to tube, train and bus services (as well as the potential extension of tram services in the future). This is indicated by its PTAL rating of 4.
- 6.12 Whilst the layout and structure of High Path differentiate it to the street-based neighbourhoods that surround the Estate, it scores “warmly” indicating that it is well integrated into the wider movement system. This is primarily due to its strong connections with both Merton High Street and Morden Road and a lack of any significant un-navigatable land uses surrounding the site.
- 6.13 At a more site specific level, this allows good vehicular access as it is relatively easy for cars to pass to and from the strategic network. For pedestrians however, the integration analysis

indicates a “cooler” score, showing that it serves only estate-based movements well with few good logical connections to the wider strategic network.

- 6.14 This differentiation reflects the philosophy of separation of pedestrian and vehicular movement. The result is that the geometry of the layout is prejudicial to pedestrian movement, with routes that are maze-like when compared to the vehicular routes.
- 6.15 Turning to connectivity, which can be used as a proxy for the intelligibility of a layout, the results of the analysis show that the routes within the Estate make it difficult for those that are not familiar with the area to navigate it easily. Sight lines within the estate are very short and interrupted, which is not in keeping with much of the surrounding area.
- 6.16 Given the strategically strong location of the Estate and lack of physical barriers to movement in all directions, regeneration of the Estate (Option 3) offers significant opportunities for improving the integration and connectivity of pedestrian routes to the wider area through good redesign of the internal spatial structure. In particular the Review highlights the potential for creating stronger connections from the Estate, across High Path to the school, church and other nearby facilities.

Layout

- 6.17 With regard to the layout of the existing Estate, the study considers building layout and building interfaces. This indicates whether the building layout and facades provide the required level of surveillance and activity to animate streets and communal areas, providing a safe feel to an area, as well as providing privacy and security of private amenity space.
- 6.18 Using figure ground diagrams, the existing layout of the Estate lacks consistency and does not exhibit a similar form to surrounding development. Buildings are surrounded by open space and their positions and alignments do not reveal or define the movement network that surrounds them, with the exception of Pincott Road and Nelson Grove Road. This design, as noted above, acts to block or deflect potential lines of movement that are achieved in more traditional street patterns.
- 6.19 Further figure ground analysis indicates that whilst High Path contains relatively high levels of open space, the lack of distinction between what is public and private is unclear. This is an inefficient use of land and of no benefit to residents or neighbours of the site as it inevitably results in unused and ambiguous space, typical of many 20th century housing estates.
- 6.20 With regard to building interfaces, the NPPF acknowledges the importance of creating safe, lively and sociable places and the outlook from buildings has an important role to play in this. At present, categorising the existing properties on the Estate as either active, passive or dead

frontages, the vast majority of buildings within the Estate have passive or dead frontages, due to a range of factors including ground floor garages, the relationship and positioning of buildings against the irregular footpath network and the setting back of buildings behind open space.

- 6.21 Further analysis of where building doors and entrances are located and how they are positioned indicates very little positive surveillance of streets and footpaths, which can lead to pedestrians in such areas feeling isolated and unsafe. This was expressed as a concern during public consultation.
- 6.22 Whilst internal reconfiguration of units (under Options 1 and 2) could improve this to a limited extent, the issues are fundamentally linked to the design and layout of the Estate. Accordingly, Option 3 offers a good opportunity to improve the interface of the whole Estate.

Quality of the External Environment

- 6.23 Turning to the streetscape within the Estate, the study identifies a wide variety of streetscapes within and neighbouring the site.
- 6.24 One of the clearest negatives within the Estate is the predominance of garage courts. These occupy a significant proportion of High Path and appear to be poorly used and generally detract from the streetscape.
- 6.25 In examination of the public realm and play spaces, comment has already been made above in relation to the poor differentiation between public and private space and a poor relationship to the existing buildings, leading to a lack of use in many public areas of what are good levels of public open space. In considering the usability of the public realm, the Review notes that levels across the site are not dealt with in a way that makes access easy for pushchairs and wheelchair users. Whilst recently refurbished play spaces are of good quality, they are let down by being poorly overlooked and tucked away against blank edges.
- 6.26 In consideration of landscaping, the main positive feature on the Estate is the number of mature trees which are interspersed throughout the Estate. Aside of them, most landscaping is either undifferentiated mown grass or hard surface access ways.
- 6.27 With these observations in mind, it is clear that full redevelopment through Option 3 could deliver significant benefits against these issues through a redesign of the block layout, the public realm, and the quality and relationship of landscaped areas to built development.

The Visual Impact of the Existing Estate

- 6.28 A Visual Impact Study (October 2016) was carried out by Peter Stewart Consultancy to build upon the urban design review undertaken by Sue McGlynn, and to introduce more information on visual considerations of the townscape around the estate. The analysis has been carried out from 15 viewpoints, including viewpoints from local conservation areas. The viewpoint locations were agreed with the LBM.
- 6.29 The study concludes that the townscape surrounding the High Path Estate has a mixed character of varying quality. It states that “The residential streets to the north and east of the High Path Estate are rather charming, but as seen in some of the views, the presence of the High Path Estate terminates these views rather abruptly, as it does not follow the same urban grid as its surrounding streets.” It outlines that the three 12 storey tower blocks are clearly visible from many locations around the site, and due to their poor architecture, they impact negatively on the wider area in terms of townscape quality.
- 6.30 The study sets out that the estate is located on a prominent site, along two main roads and behind a busy underground station. It is a highly visible development, which due to its poor urban design layout and, in some cases, poor architectural quality, has a negative visual impact on the immediately surrounding areas. The urban design and architectural defects identified in the Sue McGlynn Urban Design Review are also found to be apparent in those views that include sections of the estate.

Conclusions

- 6.31 Having considered the above issues, the Urban Design Review study ranks the features of the existing Estate using the Building for Life toolkit traffic light system. This produced a score of 3 green ratings, 3 amber ratings, 5 red ratings and 1 unknown, indicating that two thirds of the criteria fall into the concern or major concern categories. This is a strong indicator that change is required.
- 6.32 Whilst Option 2 could allow some improvements to the issues identified above, for example through internal reconfiguration of units to improve surveillance or through improvements to improving the public realm and landscaping, its scope of works is limited.
- 6.33 Option 1 would have no material impact on the baseline positions identified above, and would not rectify any of the urban design issues.
- 6.34 Given that the areas of major concern include fundamental aspects of the design of the Estate, such as the relationship of building layouts to pedestrian routes, and the predominance of

garage courts within the streetscene, only Option 3 (full regeneration) has the potential to significantly increase the quality of urban design within the Estate. This would deliver benefits to not only future residents of High Path, but also for people that live and work near to the site.

6.35 Option 3 provides an opportunity to deliver an improved urban design and to improve the character of the area / townscape, whereas Option 1 and 2 would not.

6.36 Aside of the points discussed above, the Review also highlights the potential for regeneration to introduce a more consistent and coherent approach to density and buildings heights to replace the piece-meal and varied development within the High Path Estate at the moment. This could help to create a more positive relationship both internally and with neighbouring streets and properties.

Sustainability

6.37 Whilst the theme of sustainable development flows through the entire Case for Regeneration document and all elements being considered, it is also important to consider the scope for the inclusion of specific design features under each of the Options that would bring about increased sustainability and improved environmental performance. Such measures include the incorporation of Sustainable Drainage Systems (SUDS), green and brown roofs, ecological enhancements as well as more generally optimising the potential of brownfield land.

6.38 With Option 1 including only internal works, it offers no potential for including the specific sustainable items identified above. Similarly, Option 2 offers limited potential for such measures, however green or brown roofs could be installed on some properties subject to further structural investigation. Similarly, renewable energy technologies could be installed, subject to detailed feasibility work.

6.39 In comparison, Option 3, for the full regeneration of the Estate, offers the opportunity to engrain all of the above, as well as other measures to ensure that the very design of the Estate is truly sustainable, rather than retrofitting such features into the existing properties.

Energy

6.40 Detailed analysis of the energy performance improvements that could be achieved through Options 1 and 2, when compared to the existing poor baseline position, has not yet been conducted.

6.41 Notwithstanding that, it is reasonable to assume that any improvements in energy performance achieved via fabric only improvements to the existing stock would fall short of the levels that

could be achieved through the construction of new modern residential accommodation built to current Building Regulations.

- 6.42 PRP Architects and PRP Environmental have given consideration to the comparison between energy consumption and energy costs in two typical existing properties within High Path to two similar sized new build properties. This includes one corner flat and one dual aspect flat.
- 6.43 The results indicate that for the corner flat, energy consumption could be reduced by circa 81% based on improved building fabric, air tightness, a high efficiency communal gas CHP and a photovoltaic installation per property. Similarly, a saving of circa 77% could be achieved via the dual aspect flat.
- 6.44 To consider how this would benefit CHMP residents, PRP Environmental then gave consideration to how this translates into cost savings. For the corner flat, energy costs could be cut by over half to £323 from £771. Similarly for the dual aspect flat, costs could be reduced from £538 to £349.
- 6.45 In conclusion, whilst a fabric only approach (under Option 1 or 2) would improve energy performance, when compared to the existing dwellings, a comprehensive redevelopment of the site (Option 3), through its potential incorporation of renewables such as photovoltaic panels, would certainly outperform the refurbishment works. Accordingly Option 3 offers significant cost and efficiency benefits.

Flood Risk

- 6.46 PBA have produced an Environmental Desk Study (October 2014) to consider a range of issues including flood risk and geotechnical and geoenvironmental considerations.
- 6.47 With regards to flood risk, the site is predominantly in Flood Zone 1, which indicates an annual probability of fluvial and tidal flooding of less than 0.1%. Part of the western end of the site is within Flood Zone 2, which has a flood risk of between 0.1% and 1% each year. The nearest watercourses are the River Wandle, approximately 180m to the east of the site boundary, and Bunce's Ditch, to the south of Merantun Way.
- 6.48 Given the low likelihood of flooding, proposed redevelopment is not likely to result in any flood water displacement, and furthermore, safe escape and egress routes to and from the site would be available in the unlikely event of a flood.

- 6.49 A surface water management strategy, based on Sustainable Drainage Systems (SUDs) would be developed if any redevelopment did go ahead to assist accommodation of surface water runoff.
- 6.50 In summary, Options 1 and 2 are unlikely to introduce any works that would materially affect flood risk in and around the site. Option 3, however, offers the opportunity to increase the density of housing in a predominantly low flood risk area and also accommodating SUDs which would help to attenuate surface water runoff and could potentially bring biodiversity benefits, depending on their design.

Geotechnical and Geoenvironmental

- 6.51 As referenced above in connection with flood risk, PBA's study also considers geotechnical and geoenvironmental issues following a desk study to consider 1) the potential risks and hazards associated with contamination in the ground and 2) the geological hazards and potential ground stability risks arising from cavities or other potential adverse foundation conditions.
- 6.52 Taking account of the available information and historic land uses of the site, the study concludes that there is potential for some concentrations of contaminants in near-surface soils; however, it would be reasonable to assume that basic and non-onerous mitigation measures, which are fairly standard for many urban brownfield sites could be incorporated to facilitate any development.
- 6.53 Having analysed the soil conditions, PBA conclude that it is likely to use shell spread foundations for the low rise structures. Medium to high rise structures are likely to require pile foundations, potentially via bored and cast-in place piles. Again, this is not considered to present a barrier to any redevelopment of the Estate.
- 6.54 Given that Options 1 and 2 would not require any significant levels of ground works, geotechnical and geoenvironmental issues are considered to be of minor importance. Whilst the regeneration of the Estate would require significant groundworks and the results of the contamination work are still awaited, the results of PBA's study do not indicate any factors that should prevent the potential for redevelopment or result in overly onerous cost implications to bring development forward. Accordingly, all three Options are considered to be equally acceptable in this respect.

Conclusions

- 6.55 With regards to environmental and place making factors, this report considers that the most pressing issues with the current Estate relate to its layout and building design.

6.56 Given these issues, Option 3 presents the most “justified” strategy in terms of environmental and place making factors as it would:

- enable comprehensive redevelopment and redesign of the layout to eradicate issues associated with the current layout, including passive and dead frontages, areas of low surveillance, improvements to open space and public realm, making more efficient use of the site and providing better pedestrian routes through the Estate;
- enable the incorporation of up to 5,000 sqm of non-residential floorspace, which would transform South Wimbledon as a place and destination, delivering benefits far beyond just the residents of High Path; and
- enable a significant uplift in energy efficiency and sustainability when compared to the existing stock as well as Options 1 and 2.

6.57 Options 1 and 2 are considered to be broadly similar; however, Option 2 is likely to be the marginally preferable second choice given that the enhanced refurbishment could deliver some improvements to open space and landscaping as well as potentially better energy performance than Option 1.

7. Considering the Options: Economic Viability and Cost Benefit Analysis

- 7.1 With all Options proposing substantial works, whether in the form of refurbishment or regeneration, there would clearly be a significant financial cost attached to whichever route is pursued. Whilst CHMP's priority is to create better homes for its current and future tenants, it is also important to ensure that the selected Option is financially deliverable, as per NPPF paragraphs 173 to 177.
- 7.2 CHMP and their consultants have derived the costs and values associated with each of the Options being considered in this report. This work has been fed into financial modelling, which gives consideration to the Options over a 50 year period. This financial modelling will be ongoing.
- 7.3 Due to commercial confidentiality, details associated with the financial modelling are not disclosed within this document, however, a summary and commentary on the outcomes of the ongoing financial modelling work is included below. It is important to note that the regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by CHMP and as such the financial deliverability of the regeneration of the three Estates is interlinked. High Path is the value driver and therefore the financial benefits of the regeneration of the High Path Estate are to be used to enable the regeneration of the Eastfields and Ravensbury Estates.
- 7.4 At the time of writing, the Cost Benefit Analysis undertaken by CHMP highlights that all three Options would result in a deficit over the 50 year business plan as shown below.

Option	Total benefit / (cost)
Option 1: Decent Homes	£(40,000,092)
Option 2: Enhanced Refurbishment	£(44,083,366)
Option 3: Regeneration	£9,813,654

- 7.5 The results of this ongoing work indicates that Option 3, for the regeneration of the Estates is the most sensible solution over the 50 year life cycle as it would deliver the greatest regeneration benefits having regard to CHMP's vision and planning policy requirements, including the housing, socio-economic, place making and environmental benefits identified within this report. Regeneration therefore presents the most sensible and sustainable solution. Furthermore, CHMP is an affordable housing provider who has funding in place to deliver better quality affordable housing compared to current standards, which is the key driver for the regeneration. Extensive work has been undertaken on the emerging regeneration proposals, to

incorporate homes for private occupation into the schemes to reduce the overall deficit and this will continue.

7.6 Options 1 and 2 would involve significant cost in the short term to bring the properties up to the appropriate standard. However, these costs would only ensure the properties remain at the necessary standards for a relatively short period of time. Given the condition of the properties (as explored above) a significant level of further investment would be required over the next 50 years to maintain the properties at a liveable standard. As a result, Option 3 is the most sensible solution delivering the greatest regeneration benefits.

7.7 In summary, the work that has and continues to be conducted by CHMP and their consultants indicates that regeneration (Option 3) of the Estates would be the most economic and deliverable Option having regard to ongoing financial modelling; therefore, this would be “justified” and “effective” and would therefore meet this soundness test of paragraph 182 of the NPPF.

8. Considering the Options: Public Consultation

Introduction

- 8.1 CHMP have been firmly committed to understanding the aspirations of High Path's residents and its neighbours and their thoughts on the Options for refurbishment and regeneration.
- 8.2 In order to do this CHMP's Regeneration Team alongside PRP Architects and the wider project team have undertaken a series of public events between June 2014 and the present. A summary of this consultation process is included below.

Public Events

1. Residents' Drop-In Event - 11th June 2014

- 8.3 The first public event provided residents with the opportunity to provide feedback on what they liked and disliked about the Estate.
- 8.4 Whilst many residents commented that there was a strong community spirit and they liked living in the areas, there were also a number of negative comments regarding the condition and size of the existing properties, both internally and in terms of private amenity space. Whilst the feedback was fairly unanimous that there needed to be improvements to the existing accommodation, particularly to cater for a wider range of housing needs, opinions were voiced for and against refurbishment and regeneration options.

2. Coffee Morning Event – 19th June 2014

- 8.5 CHMP and PRP hosted a drop in coffee morning event where residents were asked to fill in questionnaires and write down their thoughts about their current homes and possible regeneration.
- 8.6 The event was attended by 26 people, with 14 leaving feedback.
- 8.7 Some of the key comments coming out of the feedback included general optimism towards regeneration, however concern was raised with the length of time the phased process of regeneration might take. Some attendees also commented on areas of the Estate that did not currently feel safe.

3. Consultation Event – 28th June 2014

- 8.8 Another drop in event was held, this time on a Saturday, to allow residents the opportunity to share their views on the potential regeneration. This event also included an opportunity for children to get involved in designing their own new neighbourhood using an interactive game. The event was attended by 81 people with 49 completing feedback forms.
- 8.9 Some of the key points coming out of this event included, again, condition of properties, lack of private amenity space and the convenience of the Estate for accessing surrounding facilities and services.

4. Consultation Event – 10th July 2014

- 8.10 A further drop in event was held with 52 people attending.
- 8.11 Significantly, of the 52 people attending the event, 50 expressed support for regeneration going ahead and that they did not like the look of the existing buildings. There was also support from the majority of attendees for the idea of a neighbourhood park. Car parking levels were also identified as a key issue to be considered as part of the regeneration proposals.

5. Site Visits – 26th July 2014

- 8.12 This event offered 43 residents the opportunity to visit recent regeneration projects in Haggerston and Orchard Village with representatives from PRP and CHMP.
- 8.13 Residents were invited to comment on what they did and did not like about the regeneration projects. Positive comments included the overall pedestrian friendly nature of the streetscene and the provision of secure play facilities. Critical comments included not enough landscaping at Haggerston and within the communal areas at Orchard Village. A number of attendees also expressed critical comments on the size and layout of some units within Orchard Village.

6. Themed Workshop – 29th July 2014

- 8.14 Following feedback received at earlier events, this workshop offered residents an opportunity to comment on the emerging regeneration proposals, focussed on a number of key themes including homes, shops and facilities, landscape and open space and streets and parking.
- 8.15 Although only 15 people attended, residents indicated a preference to see separate kitchens to open plan kitchen / living rooms. A preference was also expressed for winter gardens rather than balconies and secure cycle space rather than locking facilities outside. There was also support for the larger neighbourhood park, over smaller community gardens and a preference

for private and front gardens over communal courtyards. In keeping with the feedback at the site visits, residents were also keen to see shared surface streets over more traditional or mews layouts.

7. 2nd Themed Workshop – 12th August 2014

- 8.16 Following the previous themed workshop, another similar event was held, based around the same key themes to gain a wider sample of feedback. This event was attended by 40 people.
- 8.17 Residents expressed a clear preference for a mix of housing types in the blocks including flats and houses. Furthermore, residents were keen to avoid the inclusion of single tower blocks within the regeneration of High Path.
- 8.18 Other comments included a preference for seeing non-residential land uses being focussed towards Merton High Street and Morden Road, and a desire for a well overlooked neighbourhood park.

8. 3rd Themed Workshop – 26th August 2014

- 8.19 Again, another workshop was held focussed around the same four developing themes.
- 8.20 Key feedback from this event included a preference for taller buildings towards the south of the site and desire to see a range of facilities within the neighbourhood park to allow it to be a multifunctional space. Suggestions were made for an outdoor gym, planting, a café, seating and public art. Residents were also keen to avoid the Estate becoming a through route for non-resident traffic.

9. Site Visits – 11th October 2014

- 8.21 This event offered 19 residents the opportunity to visit the recently regenerated Myatts Field and Clapham Park developments with representatives from CHMP and PRP Architects to collect feedback on what they liked and disliked about these built out projects.
- 8.22 Positive feedback included support for the underground refuse system in operation at both developments and the well overlooked and landscaped public areas. The attendees also indicated a preference for soft landscaped courtyard areas compared to hard-scaping at Clapham Park.
- 8.23 Negative feedback included comments around the lack of houses, in relation to flats and the size of private gardens. Attendees were also keen to see gardens designed to offer residents more privacy.

10. Draft Masterplan Consultation Event – 25th October 2014

8.24 Building on all the feedback received from previous events, this event tabled CHMP's emerging masterplan vision for the full regeneration of High Path.

8.25 This event was attended by 174 people, with 70 completing the feedback forms provided.

8.26 Key items of feedback are included below:

- Heights of up to 7 storeys were generally supported.
- Residents were keen to see more information on the size of the proposed residential units.
- The inclusion of maisonettes and flats with roof terraces were supported.
- Some residents were concerned about privacy and overlooking, particularly between some of the flats and houses.

8.27 In terms of support for the regeneration proposals, 72% of respondents stated that they "liked" or "liked very much" the draft layout for the Estate and 62% "liked" or "liked very much" the new home designs for the Estate. On other issues, 76% of respondents "liked" or "liked very much" the proposals for open space and landscaping.

Other Consultation

8.28 Moving proposals forward, CHMP issued their Residents Offer in late May 2015 and further public consultation was undertaken as part of this process to give residents the opportunity to engage with CHMP to discuss the contents of the Offer. This is a crucial stage of the overall proposals for the Estate.

8.29 In moving forward, CHMP are committed to continuing this process of community engagement.

Newsletters

To ensure that the existing residents are kept up to date and informed with the progress of the regeneration proposals, CHMP send out quarterly newsletters to all existing residents.

Phase 1 – Public Consultation

8.30 The most recent consultation events have specifically related to Phase 1. The previous events were however influential in the design and layout of the Phase 1 proposal, as it forms part of the wider High Path masterplan.

8.31 The Phase 1 events were held on 9th and 13th January 2016, 18th, 21st and 25th May 2016, 11th and 13th July 2016 with the latest consultation event being held in August 2016.

1. 9th and 13th January 2016

8.32 This event was the first of 2016 and refreshed residents minds after the previous public exhibition, which outlined the 'Resident's Offer' for replacement homes to residents from CHMP. The event exhibited the high level design strategies for Phase 1 to gauge residents thoughts on the general principles of the proposals.

2. 18th, 21st and 25th May 2016

8.33 The second event was held over three days. More detailed proposals were presented and this provided the opportunity for residents to comment via feedback cards and post-it notes at the event.

3. 11th and 13th July 2016

8.34 Scaled models (1:25) of some of the proposed typologies as well as exhibition boards and a 1:1 model of a 1 bedroom flat were displayed at this event. The model gave residents the opportunity to experience the new spaces proposed in one of the typologies. Questionnaires were distributed at the event and the feedback recorded.

4. August 2016

The final event exhibited models, exhibition boards and handouts related to the final application proposals for Phase 1.

Conclusions

8.35 As the design process is still evolving and much of the feedback has focused on wider issues, it is challenging to directly correlate the feedback from these events to support or opposition to a specific option, however possibly the most informative feedback from the events is that from Event 10, where there was strong support for the regeneration proposals (Option 3).

8.36 Notwithstanding this, we have ranked all Options equally on as a result of the public consultation process to avoid misinterpreting the feedback that has been received.

9. Conclusions

9.1 The purpose of this document has been to consider the technical work undertaken to demonstrate the economic, social, environmental arguments for and against three Options for the refurbishment and regeneration of the High Path Estate, South Wimbledon on behalf of CHMP to ascertain whether there is a “Case for Regeneration”. This document forms part of the evidence base for the independent examination of the DPD to assist the Inspector in considering the Plan against the requirements of the Planning and Compulsory Purchase Act 2004, and the tests of soundness identified within the NPPF, namely whether the emerging Plan is “positively prepared”, “justified”, “effective” and “consistent with national policy”.

9.2 The Options considered within this document were:

- Option 1 – Refurbishment to Decent Homes (Merton Standard);
- Option 2 – Refurbishment to an Enhanced Standard; and
- Option 3 – Full redevelopment.

9.3 The existing condition of the stock is moderate to poor and requires investment, and therefore doing nothing is no longer an option; it would not be “justified”.

9.4 The Options must be considered against the backdrop of adopted and emerging planning policy, in which there is clear support for boosting the supply of both good quality market and affordable housing to meet current and future housing needs of different groups in the community. At a Borough level, LBM are faced with increasing housing targets. Whilst Options 1 and 2 offer the opportunity to improve the quality of the existing stock, such works will have limited longevity; accordingly, Option 3, which would significantly improve the quality of stock via full regeneration for a longer time period, whilst also boosting the overall volume of units, is considered to be preferential. Regeneration would therefore be “justified” and “consistent with national policy”. Further, in helping to meet objectively assessed development requirements, a Local Plan which supports this approach would be “positively prepared”.

9.5 In consideration of socio-economic factors, the existing housing stock does not efficiently meet the housing needs of the current residents, with the assessment highlighting overcrowding and an inefficient housing mix as particular issues. Only Option 3 gives CHMP the opportunity to rebalance the mix of stock within the Estate to better meet current affordable housing needs. Regeneration is also considered to have the potential to deliver significant benefits for South Wimbledon as a centre, through the introduction of up to 5,000 sqm of non-residential floorspace, attracting increased footfall to the area, to the benefit of existing businesses as well as potential new occupants. Wider socio-economic benefits would also be secured through

including increased local spending and funding raised through S106, CIL and the New Homes Bonus. Regeneration would therefore be “justified” and “consistent with national policy”.

- 9.6 With regard to environmental and place making factors, the primary issues identified related to the layout and design of the existing Estate. Neither Option 1 or 2 offers the potential to make significant improvements to this, whilst Option 3, through a comprehensive redesign with these principles in mind, is capable of rectifying all issues, alongside significant improvements to energy performance of dwellings and the wider issue of sustainability. Regeneration would therefore be “justified” and “consistent with national policy”.
- 9.7 Economic and financial modelling work has been, and will continue to be, undertaken by CHMP and their consultants to consider the Options within this report. The work undertaken indicates that Option 3 (regeneration) is the most rational and sustainable Option which will deliver the greatest regeneration benefits. It is therefore the most “effective” Option for delivering regeneration in a cost effective way.
- 9.8 Aside of the technical work undertaken, CHMP have also embarked on an extensive programme of public consultation to understand the aspirations of the existing residents of the Estate. Whilst CHMP believe feedback from the consultation process favoured Option 3, all Options have been ranked equally to avoid any misinterpretation.
- 9.9 For the reasons set out above, it is considered that this document clearly demonstrates that Option 3 for the full regeneration of the High Path Estate, is the most preferable Option when considered against reasonable alternatives, and therefore that there is a Case for Regeneration.
- 9.10 It would therefore be a sound approach for the emerging Estates Plan DPD to support the full regeneration of the High Path Estate, as it would be based upon a “positively prepared” strategy and it would be “justified”, “effective” and “consistent with national policy” (in particular NPPF paragraphs 9, 14, 15, 47, 50, 56 to 58 and 69 to 78, 159 and 182, amongst others).