Consultation’s Transport Eastfields Comment
Falzon C

**Urban Design principles**

2.4 ...promote biodiversity through open space, street trees...’

There will be much less open space once regeneration takes place, with over twice the amount of development/units are there recently. One of the features that attracted us to Eastfields was the open space, which creates light within our homes. Under the new design, houses will be much closer together and overlooking each other, making them darker inside.

2.8 ...Permeable, legible and accessible layouts Eastfields is accessible and easy to get around. Many local people from ‘off the estate’, are able to walk or cycle to Eastfields, to local bus stops and to Mitcham Town Centre. There is nothing on the estate that restricts this.

3. Movement

I agree with ...through Yewmount Lane and Woodstock Way to allow the diversion of or provision of a new bus route to serve the estate. But there could be a problem of traffic using the road as a ‘short cut’ through the estate.

Probably a restriction maybe required for non-estate traffic, in any case a junction improvement with Tamworth Lane would be required.

Corridor to the increased amount of road traffic that will follow the redevelopment which will impact on the congestion that already occurs at the nearby railway level crossing.

Thank you for the information that is available please keep me informed of further developments.

Mandy A and Boundary K

1. Take the opportunity to improve the transport accessibility from the Mitcham Eastfields area from ‘poor’ to ‘good’. Provided with the addition of more frequent busses and/or a commuter shuttle to and from Bank station from Mitcham Eastfields by using large area underused land in and around the estate. Tuning Mitcham Eastfields into a spoke and Bshalma into a commuter hub—essentially giving access tube to Mitcham residents without the need to extend the Northern Line. Examples of hub and spoke model can be found globally.

2. Further develop the ideas stated on pg.68 to allocate reasonable space to the development of a business community to support local employment. Restrict zone to avoid the sites use to serve local food. This will be in line with the council’s stated ambitions of making Mitcham a safer and healthier place to live.

3. Further develop the ideas stated on pg.68 to allocate reasonable space to the development of a business community to support local employment. Restrict zone to avoid the sites use to serve local food. This will be in line with the council’s stated ambitions of making Mitcham a safer and healthier place to live.

4. Clear guarantee that the construction of a road adjacent to the Acacia Centre would not put at risk the continued existence of the centre i.e. that it would be demolished or torn down because of the road construction.

Mandy A and Boundary K

As for building a road leading to Grove Road it won’t be long before there are serious accidents. As it is close to the bend.

Mandy A and Boundary K

3.2 in the previous consultation document pg.68 to allocate reasonable space to the development of a business community to support local employment. Restrict zone to avoid the sites use to serve local food. This will be in line with the council’s stated ambitions of making Mitcham a safer and healthier place to live.

Environment Agency

Eastfields: This area is situated within Flood Zone 1. However, the need to ensure surface water runoff is suitably managed to allow for the new developments that are proposed, or any other flood risk that could be present, is to be included in the submission of SSDs. The suggestion of opening up a currently culverted watercourse on the eastern boundary of the site should be investigated further as part of the overall redevelopment. The opening up of a currently culverted watercourse could assist in managing flood risk at the site, as well as providing habitat and other biodiversity benefits.

As a homeowner, I am also concerned about the mixed messages being received from Circle Housing and Merton Council. Whilst the plan, and covering letter, letters, the plan will go ahead, we were told by Merton representatives, at a meeting last year, that Eastfields was highly unlikely to be regenerated due to flooding, insufficient space for new builds (before houses could be demolished), the addition of more frequent busses and/or a commuter shuttle to and from Balham station from Mitcham Eastfields by using large area underused land in and around the estate.

Noted. Opportunities for enhancements of the culverted watercourse will be considered as part of the planning application process in accordance with the London Plan 2011. The plans should also include planning restrictions.

Noted. The council is unaware of the statement that Eastfields might not be part of the Eastfields Local Plan. Merton Council has been working with Clinton Housing Group and the Environment Agency to consider the flooding within the Eastfields. Through the statutory planning process any development which takes has minimal detrimental flooding impact.

Environment

In addition, Policy EP E4 refers to the existing culverted watercourse, which as set out in our earlier representations, has not been identified by extensive technical surveys. As such reference to this should be removed or evidence provided by the Council to demonstrate the existence of the watercourse.

Noted. This section of the public highway is not within the Eastfields Local plan area.

Noted. Opportunities for enhancements of the culverted watercourse will be considered as part of the planning application process in accordance with the London Plan 2011. The plans should also include planning restrictions.

Noted. This connection would improve connectivity to adjoining neighbourhoods, facilitated improved public transport and generally ease traffic movement throughout the area, especially given the real safety and congestion problems prevalent around the nearby Mitcham Eastfields level crossing.

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Environment

This diagram for Policy EP E8 Building Heights illustrates that the land to the rear of Hammond Avenue should be a base height [a] according to policy EP E8 (a) which states “the majority of buildings across the estate must be of height similar to and harmonious to surrounding residential areas to contribute to achieving a cohesive character with the surrounding character.” The policy continues with "building heights must be based on a comprehensive townscape appraisal and visual assessment" Planning applications will be expected to demonstrate that they will make positive, not negative contribution to the existing townscape.

Building Heights

The policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue.
I believe it was approximately page 60 in the plan guidance that has specific reference to building heights being, 'Residential buildings across the estate must be of a height similar and harmonious to surrounding residential areas to contribute to achieving consistency with the surrounding character ' and 'when viewed from outside the estate, taller buildings must not be seen to dominate the landscape'. The current designs are not taking any of this into consideration, which is very worrying, as there is plenty of scope for the designs to be amended and similarly the plan guidance needs to be reviewed to ensure that this is being addressed, as up to now the guidance relating to the height and layout appears to be very generic.

2. 3.25 & 3.27 'Access for vehicles is confusing as the estate is part access from Ascot Road and part from Woodstock Way.' 'This inefficient layout restricts accessibility for vehicles, pedestrians and cyclists.' The road closure was put in place to stop commercial and private vehicles, from off the estate, using the road as a rat run, causing danger to children, and air pollution. There were also young passed riders using it as a race track, with several accidents. Eastfields is accessible and easy to get around. Many local people from 'off the estate', are able to walk or cycle to Eastfields station, to local bus stops and to Mitcham Town Centre. There is nothing on the estate that restricts this. How can vehicle access be restricted when it is predominantly residents who live here driving onto the estate??? By opening up the road you risk the road becoming a rat run again, and greater car usage through the estate will cause higher pollution levels. Why is it ok for public roads to have barriers restricting cars but estate can't?

3.30 '...the smaller spaces leading off this are less successful, as they are enclosed by the back gardens of the surrounding houses.' This is precisely what has supported the community feel within the estate. Children have a safer space to meet and play, where parents can keep an eye on them. During summer months, people use the smaller spaces to socialise.

3.36 '...to make the BMX track less visually isolated.' Whatever has been involved in this plan has not taken anyone's views into account regarding the BMX track and the major issues it causes. Noise, air pollution, from the dozens of cars attending events; danger from cars; road rage; residents not being able to park, or get into their own properties easily as BMX speculators have parked in front of their houses. Fortunately, I don't live anywhere near the track, but these are just some of the issues which have been raised at meetings and ignored. Whilst the BMX track is a great idea for children, there needs to be some consideration of the problems caused.

3.46 '...the need to provide a high quality public realm to connect the new estate with the rest of the town.' The road closure was put in place to stop commercial and private vehicles, from off the estate, using the road as a rat run, causing danger to children, and air pollution. There were also young passed riders using it as a race track, with several accidents. Eastfields is accessible and easy to get around. Many local people from 'off the estate', are able to walk or cycle to Eastfields station, to local bus stops and to Mitcham Town Centre. There is nothing on the estate that restricts this. How can vehicle access be restricted when it is predominantly residents who live here driving onto the estate??? By opening up the road you risk the road becoming a rat run again, and greater car usage through the estate will cause higher pollution levels. Why is it ok for public roads to have barriers restricting cars but estate can't?

In view of the increased number of residents planned consideration should be given for provision of a GP surgery on the estate.

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I don’t think for one moment my opinion means anything to anyone involved in the above. I now realise that despite a lot of hard work on behalf of the residents/tenants we were on a loser right from the beginning with the council coming at us from one side and Circle housing from the other side determined to take our homes away from us. Mitcham is becoming as the song goes a town offering boxes and soon the only green space left will be the common.

Thank You!

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

- Incorporating policy EP H3 (b) stating that ‘streets must be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove’. As highlighted within our previous representations, the PPG (Reference ID: 26-43) states that ‘all streets should be considered to have such a view’.

- Design and existing utilities constraints which will impact on the ability to provide a low rise of movement and place based activities’. There are design and existing utilities constraints which will impact on the ability to provide a low rise of movement and place based activities.

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

- As stated in our response to this issue in Stage 2, clear unobstructed views along the whole length of Pincott and Nelson Grove Roads will maximise the visual connection from within the estate to surrounding areas and through the estate from outside it, specifically to make places that connect well with each other and feel safe. A key means of ensuring this is to continue with its surroundings. Removing or altering this would undermine the aim the respondent is stating is important.

- The respondent gives no detail or example of the ‘design and existing utilities’ constraints they mention. Similarly, this point was made and answered in the previous consultation.

- Utilities, streets and buildings will be fundamentally changed across the estate and keeping one small element makes no sense in this context.

- Vehicle speeds in the streets will be managed by a whole range of measures not related to the positioning of buildings. All of the other streets on the estate are shown as straight, so it is unclear why one particular section is being selected where it is claimed it is inappropriate. The array that straight streets encourage speed’s is not supported. Plenty of other factors contribute to why people speed.

- Building at the scale of terraced houses would seriously reduce the number of homes on the estate, raising leaving existing residents without somewhere to live and not contributing to London’s overbearing need for new homes. The vision for the High Path Estate is that of the New London Vision, which is based on some of the characteristics inherent to Victorian neighbourhoods such as pitched roof, use of brick, traditional streets, mansion blocks, at a higher density.

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In the context of the ‘Pre-Submission Estates Plan’ we do the following comments:

- Design: Noted. Policy EP H1: Townscape (a) states: “A focal point or space must be provided that highlights the significance of the area’s local identity particularly in connection to Lord Nelson. There will be many ways of delivering this and it should complement the buildings and spaces around it, I’d detailed design of space / focal point will be assessed at planning application stage at which time we welcome further comments.

- Design: Thank you for your support. Policy EP H2: Building heights sets out that applicants must consider the sensitivity of Rodney Place. For example section (g) the close proximity of Rodney Place and Merantun Way create a need to respect existing low rise development... Building heights in this area must particularly respect and be sensitive to these constraints”

- Design: Noted. The aim is for Rodney Place to integrate well with any new adjacent streets. There are no proposals to change the character of the street or alter the cul-de-sac layout. The plan shows a potential change to the access to Rodney Place, from Gunnersbury Road to a main entry street) to a new south-east street (a minor street) itself that could have a more stylised character. This is likely to reinforce the rejected character of Rodney Place, rather than encourage use to people. Some changes are suggested to reinforce this point. Replace parts 3.140 and 3.141 with new policy: “Road style development should be reserved for shorter streets - the existing Rodney Place is a good example. Whilst Rodney Place is outside the road boundary, better linking it into the new street pattern should be considered in order to both protect its character and improve access from it to the surrounding streets.” The key to the map on page 107 regarding Rodney Place should be amended to read: “Rodney Place potential integration into new street pattern.”

- Design: Noted. Pincott Road is identified as a policy area. Policy EP H2: “street networks” sets out how new streets should be based on a traditional street alignment for example (a) Nelson Grove Road and Pincott Road provide an appropriate basis for the de-novo of the new street network” The vision for the High Path Estate is that of the New London Vernacular which is based on some of the characteristics inherent to Victorian neighbourhoods such as pitched roof, use of brick, traditional streets, mansion blocks, at a higher density.

- Design: Noted. An stanza in Parts 3.141. Linking Rodney Place into the street pattern “should be explored”. In addition to the consultation carried out on the Estates Local Plan, greater or closer links should be explored as part of the application consultation process.

- Transport: As set out in the key to the map (page 106) for 102 Street Network, a transition into Merantun Way are labeled as “North-south future extensions to Merantun Way (illustrative integration into street pattern)” Barriers or buildings should not be built within the Estates Local Plan area that would prevent integration in the future.

- Design: The diagrams are based on existing street widths, or in the case of Merantun Way, the potential for a more fundamental transformation of its character from urban motorways to urban street. The Merton High Street diagram shows existing single carriageways with parking either side, segregated cycle lane and existing tree planting on south side. Building heights are indicative and not necessarily to scale. Para. 4.16 on p118 given guidance: ensuring the ratio of building height to street width is appropriate.

- Transport: Noted. No change proposed. Whilst Policy EP H2: Street Network forms the basis of the road layout within the estate, access to roads and junctions can be restricted to vehicles, pedestrians, cycling or in any combination of the above. It is Policy 24 movement and access that sets out the policy on vehicular movement... EP H1 para. 3.155 to 3.160 refers to the existing estate, the busy main roads at Merantun Way and Morden Road, the ret running through the estate that has resulted in restricted access and restricted junctions and the potential for tramlink at South Wimbledon (Morden Road) that should be taken into account. The map for H33: Movement and access indicates that the junction with Morden Road and Nelson Grove is a “potential new access point”... As set out in policies H11 and H12 for reasons of good townscapes, to enable movement and access throughout the estate (for residents, delivery vehicles etc) and to maximise flexibility into the future, the street network at Pincott Road and Nelson Grove Road should be designed wide enough to accommodate a main vehicular route. Junctions have been indicated as “main access point” “potential new access point”. This approach allows specific access to junctions (left turn, right turn etc) to be determined at the time of planning applications but also allows maximum flexibility for the future - should traffic modelling demonstrate that universal vehicle access was desired then this could be achieved if Nelson Grove Road and Pincott Road are designed to accommodate vehicles as the Estates Local Plan sets out.

- Transport: Noted. The street network is proposed to better support movement across the estate. The opportunity will be taken to promote the health and community benefits of reducing car travel in favour of walking and cycling. Proposals for a tram stop at South Wimbledon are still at an early feasibility stage and may therefore change; however any proposed development must consult TL at each stage, in addition to TL’s engagement on the Estates Local Plan. The Council will continue to work in partnership with TL to ensure that transport infrastructure opportunities are incorporated where viable.
In regards to the High Path estate proposals, my main concerns are:

- Increase in general road traffic - Abbey Road is not a rat run in itself, often congested with speeding cars. With a proposed secondary school and increasing accommodation numbers locally, are there any contingencies in place? I am a Croft road resident and cars will bomb down this street, Mill road, Dane Road, Meadow road when they come up against queuing on Abbey Road or Morden High street. Many residential streets are dead ended locally and I don't understand why some streets both off Merton High Street and Collens Wood are prioritised for such a feature over others. can you explain this to me.

- Transport

5. Movement and Access H3

Noted. No change proposed. Policy H3 set out that development proposals must provide public open space to address the current deficiency in access to Local Open Space. I would like to ensure that this policy is not changed and that any future development will include public open space.

- Policy EP H5 sets out that development proposals must provide public open space to address the current deficiency in access to Local Open Space

- Environment

2.15. 'Whilst I acknowledge that the estate is badly designed in terms of buildings and space and that it has a high FPA rating, this does not automatically mean that the area can sustain a huge increase in density on the estate and the surrounding area, where much development is also taking place. The local transport links can only support a finite number of people, ditto other services. Is enough been done to ensure, for example amongst other amenities and services, sufficient sewage waste extraction and medical facilities.

3. Movement and Access H3

Noted. Regarding transport, the council is working with Clarion Housing Group and Transport for London on transport and travel issues around High Path for the Estates Local Plan. In addition, at the planning application stage major new development is expected to prepare a detailed transport assessment to evaluate potential impacts and provide recommendation as to how these might be managed/mitigated. This review typically includes consideration of other significant planned development nearby. Traffic calming and management measures can change over time to take account of the views of local residents and changes in traffic movements.

3. Movement and Access H3

Noted. TfL has been consulted from the outset and raised no concerns regarding underground capacity.

- TfL Schedule of stage 3 pre submission reps in policy order_9E0A038

3. Movement and Access H3

Noted proposals for a tram stop at South Wimbledon are still at a early feasibility stage and may therefore change. The Council will continue to work in partnership with TfL to ensure that transport infrastructure opportunities are incorporated.

- TfL Schedule of representations received at pre submission publication (stage 3) of Merton's Estates Local Plan December 2016 - February 2017

3. Movement and Access H3

Noted. Policy H3 movement and access (c) state Proposals must include measures to reduce the physical barrier (severe) caused by development proposals must provide public open space to address the current deficiency in access to Local Open Space

- SD.6b Schedule of representations received at pre submission publication (stage 3) of Merton's Estates Local Plan December 2016 - February 2017

3. Movement and Access H3

Noted. No change proposed. Policy H3 sets out that development proposals must provide public open space to address the current deficiency in access to Local Open Space.
We considered the retaining of mature trees in the area as this not only adds to the green-space aesthetics but also enhances the clean/environmental buffer for air pollution off the nearby highways.  

<table>
<thead>
<tr>
<th>Reference</th>
<th>Consultation's Description</th>
<th>Estate</th>
<th>Comment</th>
<th>Policy Area</th>
<th>Policy</th>
<th>Officer Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>2612HP</td>
<td>High Path Community Association</td>
<td>High Path</td>
<td>We noted that new developments at Barons Ditch will be considered as part of the planning application process in accordance with the London Plan 2015. The provision of green-blue space reduces heat island, improves biodiversity and helps to manage flood risk.</td>
<td>Environment</td>
<td>Open Space</td>
<td>Noted.</td>
</tr>
<tr>
<td>09720026</td>
<td>Environment Agency</td>
<td>High Path</td>
<td>This area is mainly situated within Flood Zone 1, though a part of the site is located within Flood Zone 2. The opportunity to increase the density of housing within a low flood risk area has been highlighted in the Plan. The recognition of needing to ensure surface water runoff is suitably managed to allow for the run-off rates that are compliant with guidance and policy is noted as are the references to the inclusion of SUDS. The Barons Ditch, a designated main river, runs along the edge of or just within the boundary of the overall site. We note that comment is made regarding further investigations into the origin and route of this watercourse, as the exact like of a culverted watercourse can be difficult to determine from the surface. If there was an opportunity to open up a culverted watercourse it should be looked into further, as this can help to manage flood risk as well as having a number of biodiversity benefits. If development was moved away from the watercourse that would also be of benefit in terms of access for maintenance purposes.</td>
<td>Environment</td>
<td>Environmental Protection</td>
<td>Noted.</td>
</tr>
<tr>
<td>18824507</td>
<td>Veacock I</td>
<td>High Path</td>
<td>It is also contended that new properties will be easier to heat. As all of the existing have insulating roof spaces where there are pitched roofs, most have insulated cavity, and all tenanted properties have double glazing. The only improvement would be if all roofs were pitched and insulated (admittedly today one would build with pumped insulation to flat roofs which existing do not have - that could be retrofitted), triple glazed and solar panels contributing to space heating.</td>
<td>Environment</td>
<td>Environmental Protection</td>
<td>Noted and addressed in the London Plan 2016 policy 3.15, Merton’s Core Planning Strategy policy 3.01 Policy EP H8 Environmental Protection. Section (b) echoes the London Plan 2016 and Merton’s Core Planning Strategy by stating that new development should demonstrate energy efficiency improvements at each level of the Mayor’s Energy Hierarchy: when compared to the existing buildings on the estate. Building fabric first before district heating or renewables. Section (c) of the same policy goes on to make more detail to require proposals to provide suitable comparisons between existing and proposed developments in order to fully demonstrate the expected sustainable design and construction improvements: avoidance of internal overheating, efficient use of natural resources (including water), minimising pollution; protection of biodiversity and green infrastructure and sustainable procurement of materials.</td>
</tr>
<tr>
<td>22000790</td>
<td>Cohen E</td>
<td>High Path</td>
<td>2.47 At P3: ‘Promoting sustainable development – does this take into account the carbon emissions of the building materials, machinery, equipment etc used in the construction as well as the carbon footprint of the finished buildings over the pay’s usage? If not, it should do so. There is no point in having a low carbon footprint building if it has used many times the carbon to build.</td>
<td>Environment</td>
<td>Environmental Protection</td>
<td>Noted with thanks.</td>
</tr>
<tr>
<td>2612HP</td>
<td>High Path Community Association</td>
<td>High Path</td>
<td>EP H8 and f) the feasibility of CHF and district heating must be investigated. As a minimum this should include: (i) An assessment of the secondary heat sources within a 400-metre radius of these boundaries (e.g. river water heat recovery from the Wandt; heat extraction from the London Underground). (ii) Evidence to demonstrate ongoing engagement with key stakeholders associated with the potential secondary heat sources such as Transport for London and the Environment Agency feasibility. (iii) Consideration of air quality issues should include an investigation into the potential benefits that a heat network could deliver to the wider area through the connection to existing buildings or development sites outside of the high path regeneration. (iv) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor’s Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development sites on the estate. (v) High Path Community Association is a constitutionalised residents group based in the High Path Estate, South Wimbledon, SW19, which works with the following community partners: (alphabetical order) Belful Futuh Mosque, Catch22, Circle Housing Merton Priory, Cooperative Foods, Duke of Edinburgh Awards (Merton), Healthwatch Merton, High Path Resource Centre, Independent Merton Greenpeace Forum, Morton CL,Merton Council, Morton-Abbey Primary School (Tavistock) and Triente), Mertonforge Forum, Morton Tenants Residents Federation, Merton Voluntary Service Council, Prostate Cancer UK, Safer Neighbourhood Panel (Abbey ward), St John’s Church, Sustainable Merton, WIPPA (West Indian Parents and Friends), MIPFCA. Inengeneriskelsven! (If a living organism) reproduce (new tissue) (c) bring new and more vigorous life to an area or institution/objective 1: reblend, especially in a spiritual or moral sense-Origin: from Latin regeneratus 'create again' - Concise Oxford Dictionary</td>
<td>Environment</td>
<td>Environmental Protection</td>
<td>Noted with thanks.</td>
</tr>
<tr>
<td>15123551</td>
<td>Seavills / Clayton / Latimer</td>
<td>High Path</td>
<td>Environmental Protection – Policy EP H8 refers to investigating the potential air quality benefits of a CHF on existing buildings outside the High Path estate. It is considered unreasonable and unfair for an air quality assessment to consider the potential benefits to existing buildings which are outside the control of the applicant and the application site.</td>
<td>Environment</td>
<td>Environmental Protection</td>
<td>Policy EP H8 sets out policy for building heights in relation to specific character areas such as Morden Road which is addressed by EP H8(c) This should be read in conjunction with further guidance para. 3.205 which aims to ensure height to street proportions do not result in poor pedestrian environment.</td>
</tr>
</tbody>
</table>

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**Reference**: SD6 Schedule of representations received at pre submission publication (stage 3) of Merton’s Estates Local Plan December 2016 – February 2017

**Policy Area**: Environment

**Comment**: Noted with thanks.
**Clarion Housing Group response**

"The overall vision for the High Path Estate includes the aim that new development have permeable, legible and accessible layout, as such a multi-use environment. e) The urban design principles for the estate includes the aim that new development have permeable, legible and accessible layout, as such a multi-use environment.

Noted. c) Policy EP H8 sets out policy for building heights in relation to specific character areas such as Morden Road which is addressed by EP H8 c). This plan deals with building heights specific to its local context. The guidance on building heights is appropriately based on this, rather than the option of people in another, albeit nearby, part of the borough being consulted on a different piece of guidance.

*Noted. This plan deals with building heights specific to its local context. The guidance on building heights is appropriately based on this, rather than the opinion of people in another, albeit nearby, part of the borough being consulted on a different piece of guidance.*

**Note:**

- **CHG place a strong focus on providing responsive, reliable services to residents and will continue investing in the**
  - **Comment**
  - **Policy Area**
  - **Policy**
  - **Officer Response**

- **Design**
  - **B. Building Heights EB**
  - **Noted.**
  - **Policy EP H8 sets out policy for building heights in relation to specific character areas such as Morden Road which is addressed by EP H8 c). This plan deals with building heights specific to its local context. The guidance on building heights is appropriately based on this, rather than the opinion of people in another, albeit nearby, part of the borough being consulted on a different piece of guidance.*

The new replacement house does not have a garage at all. This means a loss of our livelihoods. Any financial compensation for loss of a garage is not acceptable. A one size fits all approach is not the answer to our plight and the housing association must adopt flexible methods to meet our housing requirements, as we are enjoying now, as stated above.

**Conclusion**

1. **The new replacement house does not have a garage at all. This means a loss of our livelihoods. Any financial compensation for loss of a garage is not acceptable. A one size fits all approach is not the answer to our plight and the housing association must adopt flexible methods to meet our housing requirements, as we are enjoying now, as stated above.**

2. **Noted.** Policy EP H8 Building Heights EB sets out that applicants must consider the size of building relates well to the building heights on the north side of Morden High Street.

3. **Noted.** The overall vision for the High Path Estate includes the aim that new development have permeable, legible and accessible layout, as such a multi-use environment.

4. **Noted.** Greater details on exactly what the new estate would look like will come at the planning application stage. Planning applications will have to demonstrate that the new estate will fit in harmoniously with the surrounding development.

5. **Noted.** Policy EP H8 Building Heights EB sets out that applicants must consider the size of building relates well to the building heights on the north side of Morden High Street.

6. **Noted.** This plan deals with building heights specific to its local context. The guidance on building heights is appropriately based on this, rather than the opinion of people in another, albeit nearby, part of the borough being consulted on a different piece of guidance.

**Clarion Housing Group response**

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**Clarion Housing Group response**

"Our current house is an end of terrace corner house. We have an on plot, big garage in the back garden which is our lifetime for our daily living space and employment. This facility is not replaced or taken into account at all as a loss of quality house space and facility which is our bread and butter. We require an independent on plot locked garage for our landowners as we have had it for the last 30 years.

The new replacement house does not have a garage at all. This means a loss of our livelihoods. Any financial compensation for loss of a garage is not an answer to our requirements to develop housing space needs and economic sustenance.

A one size fits all approach is not the answer to our plight and the housing association must adopt flexible methods to meet our housing requirements, as we are enjoying now, as stated above.

The housing association's measurements for Internal and external properties and facilities are selective and somewhat manipulative, for example, we have a separate living room and kitchen, but in the new property it is open plan, so if we want to divide it separately then, the new kitchen which we will build will make it an even smaller house than what we have now. Also, access to living room is via the kitchen door which is totally impractical and dangerous for family living as well detrimental to home/self-employment.

Focal spaces such as a fire/chimney place, is not taken into account. If we were to remove the chimney, we can have enough space to fit an office desk. So that is a total loss of space. Also we have big windows and windowsill, which will be lost in the new designs. We will not have direct sunlight and natural air circulation because of the new designs which are extremely poor, for example, a bathroom is in the middle of two bedrooms, without window.

**Premises**

- **B. Building Heights EB**
  - **Clarion Housing Group**
  - **Noted.**
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All new houses are at least 0.5-metre narrower than our current house, therefore we will not be able to use bigger furniture as we have now in our new houses. It will be cramped and an impractical living space. Although it may be same in total square metres, it is not in terms of its most usable design/space. Roof terrace space and the ground level space are not comparable spaces. Our living room is not of the same size as we have now. The layout/size of the living room, kitchen bath and bedrooms are impractical usage – for example, all rooms are rather narrower and linear than our current spacious building living room and bedrooms. The wall between the kitchen and living room allows us to have extra wall cupboards for storage, as well as ground level storage or to hang a flat screen TV. But new designs are open space, therefore totally useless for our big family use. The same applies to loft space and quality ground level garden space, as well as the location of the property which is deprived of direct sun light, natural air circulation and open sky views which we are enjoying at the present time.

Rodney Place replacement houses’ internal designs and sizes are extremely undesirable. Our needs and views are totally ignored, particularly for internal designs and sizes, which is extremely demoralising.

We were going to convert our huge loft space into a third bedroom similar to 40 Nelson Grove Road, but cannot do it now due to the impending housing regeneration proposals. We have plenty of loft space, which we are using for multipurpose use, and we can convert it to another bedroom as per our needs.

We are an overcrowded family and we look to have a bigger house in Rodney Place, but we will only be offered a 2 bed house as we have now, we are happy to upsize it to a 3 bedroom house to alleviate overcrowding by paying a reasonable cost to difference between 2 bed and a 3 bed house, but not at open market value. We will be charged for a 3 bed house, which is in fact of the same size as our 2 bed house. The only difference is that the left left in our 3 bed replacement house is converted into a bedroom, calling the same size house a 3 bed house, therefore are financially penalised for the same sized house, which we are supposed to get as a replacement house.

New housing is supposed to resolve overcrowding problems for all residents affected by the housing regeneration and not only the social tenants. We were social tenants in the past and just managed to improve our life chances after 40 years of struggle and hard work only to face punishment for being prudent when we are at the end of our lifecycle.

There is nothing wrong with our current house. It is of sound build and has gas central heating, double glazing, loft and cavity insulation etc. and we are being forced to accept lower housing facilities to facilitate housing regeneration at our cost, basically to rob us to support the housing association to meet their decent home standards requirements at our cost. This should not be allowed because the housing association acquired Merton’s housing stock to bring it up to what it considers decent home standards within five years, and it failed to do so. And we are being penalised for Merton Council’s and the housing association’s deficiencies.

The housing association wants to become the sole owner of the High Path area through systematic means. It is offering us punitive/restrictive covenants and terms and conditions by changing our current favourable house ownership rights. For example, the housing association is deliberately designing the houses in such a way, to attract service and administration charges from current 100% freehold house owners, when it is not appropriate. For example, linking street houses to a communal heating system, or running services mains utilities under the new replacement houses, when it is not necessary to do so.

The issues raised concern Clarion Housing Group’s detailed masterplans. These detailed matters will be addressed through the statutory planning application process.

We the low income, prudent citizens and true financial stakeholders, (owners of freethold traditional houses and leasehold houses and flats, the main town because we are not treated fairly in terms of replacement houses and terms and conditions related to new housing/housing offer etc. in comparison to social/housing tenants).

It is rather strange that the housing association and Merton Council has decided to exclude the proposed Harris Academy Secondary School development on High Path from all their discussions.

The impact of a new proposed secondary school on High Path, is not mentioned anywhere in the whole document, and will have a detrimental and devastating effect on the current and future residents, the entire High Path regeneration project, antisocial behaviour/law and order situation and an adverse effect on other residents of Merton passing through High Path. For example, extra traffic, traffic, traffic problems at bus stops and underground stations, local supermarkets with more than 1000 children entering and leaving High Path at at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.

The entire project is skewed in favour of Circle Housing and Merton Council, but not in favour of independent residents of freethold houses and leaseholders of Merton, for example Pincott Road terraced houses.

The High Path local plan must not be inferior to any other housing standards applicable to other houses in Merton. The so called acute traffic, footfall, problems at bus stops and underground stations, local supermarkets with more than 1000 children entering and leaving High Path at at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.

If our current housing standards and facilities cannot be improved by the regeneration project than please do not rob us of what we have got now.

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If our current housing standards and facilities cannot be improved by the regeneration project than please do not rob us of what we have got now.

Thank you.
Service has currently been too slow and we have had to wait some time before getting any response. The long delays in the system for repair work can lead to wear and tear of the properties, which in turn can negatively affect the overall condition of the estate. Clarion Housing Group response: We appreciate that there may be delays in our response times, but we also need to ensure that repairs are done properly and that any issues are resolved appropriately. Please let us know if there are any specific problems you are experiencing.

· A lack of communication and transparency from the council and officers can make it difficult for residents to understand the development plans and to have their voices heard. Clarion Housing Group response: We are committed to improving our communication with residents and ensuring that they are kept informed of all developments. Please let us know if there are any areas where we can improve.

In summary, there is a need for clearer communication, timely responses to repairs, and better management of the estate. Clarion Housing Group response: We are working to address these issues and to improve our services. Please let us know if there are any other concerns you would like to raise, and we will do our best to address them.

Clarion Housing Group response to the consultation on the High Path Estate redevelopment: We are committed to ensuring that the redevelopment of the High Path Estate is carried out in an inclusive and transparent manner. We are grateful for the feedback we have received from residents, and we will use this to inform our plans for the future.

What is the split between social housing, PRS and private ownership?

The Socio-Economic Analysis confirms that according to GLA population estimates, there are 1,700 people in the immediate area of High Path.

What percentage of existing High Path residents are in favour of the proposed development?

The survey was conducted as a face-to-face, telephone and online self-completion survey consisting of one open and 15 closed questions. The fieldwork was carried out between 1st July and 29th July 2015 and a 52.5% response rate was achieved with 634 responses collected across Eastfields, High Path and Raynes Park. Key findings from the survey are summarised below:

· For the council's consultations, more respondents favoured whole or partial regeneration than bringing existing homes up to Decent Homes standard. Clarion Housing Group response: We conducted a public engagement exercise to gather feedback from residents, and the results show a significant level of support for regeneration.

· There are 609 homes on High Path. 60% are owned by Clarion Housing Group, an affordable housing provider. The remaining approx 200 homes are privately owned and of these approximately 15% [100] are rented out by their landlords. The number of homes privately rented out can change at any time as it is up to the landlord whether they choose to occupy the home or rent it.

Clarion Housing Group response: The Affordable Rent (AR) scheme has been a separate process and does not form part of the Estates Local Plan. All existing residents have been offered the opportunity to move back to High Path at no additional cost.

What percentage of existing High Path residents are in favour of the proposed development?

The responses to the consultation were as follows: 60% of residents expressed support for the proposed development, while 30% were against it, and 10% were undecided.

Clarion Housing Group response: We are grateful for the feedback we have received from residents, and we will use this to inform our plans for the future.
Lack of Alternative Proposals with regard to External B - I have already mentioned this in respect to consultation events. My personal dislike of the building happening in the likes of Colindale/Hendon airport know no bounds. The completed style at Wembley Chase is in small doses, but not in the main. Key points must be to have external windows with natural light – this is important for herbs on the window cill and use of sunlight to dry dishes.

Alternative accommodation on the estate. Ideally we would wish to remain in Abbey Road, despite the traffic issues, and although we understand it can be costly my mother's present circumstances means that would be under funded unless disabled grant terms with means tested contribution, aside from we have already demonstrated that the existing flat just flat out meets our needs, but only to the extent that the external storage is retained, the opportunity to rent a garage – indeed it is unfairly prejudicial to tenancy types that a for historic reasons a family may have had a house with integral garage type parking, where the original offer of accommodation to ourselves was one of a flat with the possibility of garage rent – which to which we have done so in 1980 and the completion of the Pathways, and the provision of charge free parking space on first come first served basis, this provides the initial package of benefits that we have previously made clear in terms of a replacement any reduction in the existing floor space including all integral and external storage plus the demanded lease will not be affected, nor any reduction in the running in the running of any wall or reduction in door aperture depth or height including any window or wall space above. We will do not accept any enclosed common entrance lobby, and although ground floor might be nice, we are currently on the first floor, which gives a good compromise for looking over external areas and roads and generally being ronwy neighbours participating in community activities. Additionally there is no restriction on the size of the kitchen, and although smaller than existing (and, for reasons of privacy) no larger than 10% of existing and no other than lounge to window to be floor to floor – this is to maintain the workspace which we use for shelving and storage, finally no reduction in the running length of window cills (for our cat's perch and plant pot!) nor reduction in the size of kitchen cupboards – ideally we would like to move the existing to any new accommodation. Naturally as the move is to the basis of the Scheme Developer all existing in property to be in prompt and workmanlike manner to be uplifted moved with all care and attention and so provided in the new property.

Funding Offer – having noted the foregoing, if it is considered that a replacement property has an additional value beyond the £££ value agreed for the property (or a claim for a reduction on a share of current market value, if we so desire and it is determined, against our wishes, that our existing flat be demolished, and sufficient houses for this flat, there should be opportunity to acquire, on same shared ownership terms excluding down staircasing on the difference in price, a new house, if it meets our needs, either pre or post development simply because when first moved here we were allocated a flat, there should be opportunity to acquire, on same shared ownership terms excluding down staircasing on the difference in price, a house, if we so desire and it is determined, against our wishes, that our existing flat be demolished, and sufficient houses for this purpose should be provided with the proposed development.

Note: The details of the tenant offer sit with Clarion Housing Group. It is outside the remit of the Estate Plan.

Clarion Housing Group response

As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed. Residents needs and priorities have been the focus of our consultation and engagement with residents since 2013. The layout of replacement homes is not yet determined but houses will be of being built either as open plan or with separate kitchens and living space. Where the design allows bathrooms will have windows but the priority will be to provide natural light and ventilation to habitable rooms.

Clarion Housing Group response

The Estates Local Plan will ensure that replacement homes are built to modern standards. The Development Plan comprises more than just the Estates Plan. It is also linked to London Plan, Core Planning Strategy, and Site and Sites Policy Plan. Collectively these documents will be the basis of the Plan for the area which will ensure that the representation delivers housing choice and quality, including in relation to inclusive access. As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed.

The Residents Offer has been a separate process and does not form part of the Estates Local Plan.
Dear Future Merton Team and Secretary of State (Environment). I would be pleased to take this opportunity to put forward my thoughts on the plans for the regeneration of High Path Estate. I hope that you will listen to our concerns and consider them, so that the process we and our neighbours feel we have been ignored. In particular we urge that measurable controls are put in place to ensure that Circle Housing must adhere to the policies you have outlined.

Please note that I am the owner of XXXXX Merton High Street, SW19, please could you forward me any information/correspondence relating to the redevelopment of High Path as the building is now ten years old.

Noted with thanks. Clarion Housing Group have undertaken research, which supports the case that Decent Homes can be more sustainably achieved via regeneration which will help create new well designed high quality neighbourhoods aimed at fundamentally improving the quality of lives of existing and future generations living in the area.

Noted. Both diagrams are indicative: the aim of the policy is to highlight the need to improve better links, however it is not intended to advise on the functional details. Minor modification Page 111 and Page 122 to High Path: Amend as shown. Add indicative to the key for each diagram on page 111 (High Movement and Access 112 – Analysis and planning policies High Path (beside the key for the three green arrows).

Noted with thanks.
This is to inform you that as a responsible citizen and long standing residents of Merton, we do not object to any House building projects which are fair and are not robbing us to subsidise new housing at our expense in the name of general/common good, through negotiated means.

Merton does own any housing stock therefore the subject heading is misleading. It is the housing association in the driving seat and not the Merton Council and the housing association staff are the main contributors of the above document.

Our current freestanding housing rights, housing facilities and housing standards as we are enjoying now must be fully protected and at least be matched if cannot be improved in the replacement houses being offered to us.

There must not be any restrictive/puristy covenants and ransom/reclawback clauses (if we want to sell our house to upsize to meet our family needs), such as a 5 year 100% property price difference repayment and 11 year staggered profit repayment clauses, when we are currently enjoying 100% freestanding housing rights without any debts and are in our 60s.

We must be given at least the same opportunity to maintain our current housing facilities and employment chances as we are enjoying now, if it cannot be improved in the regeneration plan.

Unfortunately, it would appear that the secret past between the housing association and Merton Council is to safeguard their financial position without safeguarding our freestanding and leasehold house owners housing, financial and economic rights and wellbeing. It would also appear that the local plan is prepared to meet Merton’s and the housing association’s objectives at the expense of the High Path freestanders and leaseholders and we must be protected from these almighty powers who are not acting fairly in fulfilling their public duties at all their residents.

There is overwhelming bias in supporting/subsidising all social tenants of all estates and house owners of Ravensbury Grove at the expense of freestanding and leasehold house owners of High Path and it is just not fair.

Noted. The council, as the Local Education Authority, monitors school intake annually and plans for the future. Current projections indicate that Merton has adequate primary school places for the next five years but requires secondary school places. In addition to the expansion of other Merton secondary schools, the proposed new secondary school, Harris Academy Wimbledon, may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarington Housing Group’s initial proposals and the Estates Local Plan.

We also have the internal transport and access, and the existing cut off from Merton Way is a problem. Ideally High Path should be converted to a quiet way for bicycles and pedestrians only, with access to Merton Abbey School, The Resource (disabled persons) centre, Elm Church and Domes Office and service yard being onto a speed limited Merantun Way, however and Merton’s Office have consistently insisted that this is a relief road, without realising the development I have outlined above has altered the character and actual use of the road from its original – literally half-baked purpose.

Noted. The Estates Local Plan helps the council plan for population increases. Merton Partnership (the council, NHS, Fire service, Police and other public sector and voluntary bodies) work together on the Community Plan and other proactive planning for population change and service provision. This includes healthcare and schools provision.

Noted. Policy on Land use supports commercial and community Basespace within a regenerated High Path. Although the NHS has not currently highlighted the need for new GP premises in this area, these premises must be delivered in a way that is beneficial for the High Path.

Noted. In addition to the Estates Local Plan, The council will consult with residents and stakeholders on all submitted development proposals. Any planning decisions will take account of any responses received from that consultation.

Design. The Council are responsible for maintaining road surface as in their list of adopted roads they exclude a number of un-named roads unnamed but specified as unadopted as Priory Close – High Path and (f) (including Modification 13) seeks to explore street connections between High Path and Merantun Way with Transport for London. HP.3

Noted with thanks. As there are no GPs in the Estates Local Plan, we understand that these comments related to Clarion Housing Group proposals and we will pass this to the planning application stage we will pass this on to Clarington Housing Group.

Design. Noted with thanks. This is outside the remit of the Estates Local Plan.
Consultation’s Officer Response

<table>
<thead>
<tr>
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<tr>
<td>16O015HP</td>
<td>Veacock I</td>
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<td>Veacock I</td>
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<td>N/A</td>
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</table>

In Estate and their policy order

- **Gilbert Close**: Partly built on a Congregational Church former burial ground. Close is onley beign divided and trailrver families – mostly the Bons – Caroline Bond was lilled by aircopt machine gun fire in W22 on this site, there were also frntards serving shops in Merton High street prior to 1955 and possibly the site of an Italian Prisoner of War Camp during WW2
- **Ryder House**: Broadly a block of flats facing east/west for dual aspect flats, with two stairwell cores on Haywood Close, and Two on area of named roads (arguably the East end of Rowland Way, or the, as I would say, the West extension of Nelson Grove Road, short arms to north and south form an effective L shape, with the for extensions thereof looking fine elegance bay extensions, but again flat rooves suffer from the same lack of attentive maintenance. The main part of the block has an italianate red tiled pitched roof, again the formation of mansard flat would not be impossible, along with extending the end flats over the flat rooves, to provide larger dwellings assisting with overroading. Much of Ryder House is built on the former repair works of Picher Motor Bodies (who moved to Andover in 1930) 
- **Longueville Close** - This provides a strange duplex of flats in L shape. The external is not uncreative but access is difficult and appears impossible to improve for persons with disabilities, one solution would be to gut internally the unit, and re-configuring as duplex maisonettes instead, forming a new block a little further north on part of the parking areas and/or extending into the 'bear pit' play area, which has never once construction with the tower blocks, been a suitable place to play, in forming a better courtyard area to the east of existing Reformer House a better working of accommodation and space could be made at minimal expense for a good gain.
- **Ryemy House**: The lounges of this have an elegant view over the playing fields of the primary school and although steam trams no longer puff along the railway there is external movement to be noticed . Access to the two stairwell cores is poor and the bin stores and washing areas need re-working. The roadway again is unsuited to or adapted by merton council. The variance are the only outage on the estate to have elegant 1930's decorative metalworkon them. The four stores only work here on high path itself because the building is set back from the road and behind a grass area, there is scope to break-out the ground floor flats as gardens, but gardens need time and maintenance which not every householder is able to devote effectively
- **Tanner House**: Built quite late into the 1970's what should be a good sized room was built unusually small to my view, with a cramped form of the 1 shape. But there is scope to extend at the east to build three larger flats, with re-work of 5th store, break the L and provide two separate blocks, otherwise overall I am personally unworried about the loss of this property if a building or buildings of quality can be placed on its footprint.
- **Myhill House**: Has the two commercial units built into the estate, one was a convenience store, replaced Lee's Store on the site of May Court and a replacement for WW Lamperts from Merton High Street, at present there is an office and convenience store, which use from time to time and it is important for a retail offering on the south side of merton high street accessible by all persons. All flats are 2 Bed but they are smaller than other two bed units, sensitive re-configuration maybe extending toward nelson grove road may provide some better space and more dwellings.
- **Blagdon House**: Probably exemplifies some of the worse construction on the estate, small internal units, dark internal stairwell and corridor, dual entrance yet only four units per landing core – two per doorway, no access for wheelchairs to upper floors. I am afraid that demolition is the only sensible thing, and allowing ribble of the green space and trees to Merton High Street there is scope for a quality, four to three storey building in a modern (but not the brick and metal window design proposed) - a white render with flying V balconies and some vertical timber cladding should look quite good on this corner, possibly munted into the curve.
- **Vanguard House**: Probably exemplifies some of the worse construction on the estate, small internal units, dark internal stairwell and corridor, dual entrance yet only four units per landing core – two per doorway, no access for wheelchairs to upper floors. I am afraid that demolition is the only sensible thing, and allowing ribble of the green space and trees to Merton High Street there is scope for a quality, four to three storey building in a modern (but not the brick and metal window design proposed) - a white render with flying V balconies and some vertical timber cladding should look quite good on this corner, possibly munted into the curve.
- **Dole Close Sane Close**: Hayward Close Downman Close - The houses seem acceptable as they are. Sane Close on the site of the Dog and Farrants has a present day meaningless bump of grass in front of it. Councillors have suggested an open air market on new proposals, this area, if re-modelled or green drainage hardstanding could be suitable as it is. Houses themselves too small for me, presumably residents are happy with them. The other closes have houses built that deliberated much of the commercial side of Merton High Street. Built as replacement for houses demolished for the All Saints Estate many owner have already moved once. Some problems with the sheer busines of Merton High Street Traffic and pedestrian usage of the estate roadways, but the use of the high street want go away with re-development on the similar footprint. Houses themselves too narrow for my personal use, but fairly large, and most people I know are happy with what they have, or have bought (I can quote four persons from the roads with ease). It appears proposed replacements are planned for Abbey Road, but we on Abbey Road do not want to move from our existing area and its 
- **Hillborough Close**: Interacts with Northfield House. Biggest problem is outlook is mostly to the north over a lot, bedroom and lounges face south, which is generally good. Solid construction, completed earlier just after merton place. Has Block and Brick construction thoughttful, cavity wall and roof insulation in loft space of tiled pitched roof. Possibly build mansard flats into roofspace if water tanks relocated.
<table>
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<tr>
<td>180015HP</td>
<td>Veacock I</td>
<td>High Path</td>
<td>Norfolk House - Good, some 2 beds have triple aspect flats, spacious internals, 2 beds (7m2) approx ground floor storage, 2 beds (6m2) external storage on 2 beds, 6 beds on 1 bed. 1 Bed has internal built-in bedroom wardrobe and plenty of storage space. Separate kitchens mean easy to entertain with guests overnighting in lounge if required. Original space heating Cool fire with back boiler to immersion heater – quite efficient some have back radiators to a bedroom. Design could have been better but overall 100% by 12th lounge beds 12th by 12th and good sized kitchens/diner with plenty of seat hanging etc space in hallways. Difficult to find larger flat in any purpose built block private or council house anywhere in South London or Surrey. Delays in completing original construction from 1959 to 1962 possibly led to some concrete failure by assured by Mr Harold Turner of Merton Housing Department in the 1980s this was not a problem. As long as day-to-day maintenance is completed a budget of £8000 a year on service charges would not be unreasonable to assure this, build lift to stairwells, not impossible. Extend West Flank to turn 2 beds into 4 bed properties for overcoming and south wing toward nelson grove road to create 2/3 bed units and reform doorways there to avoid the ground floor dark spot under overlooked design for crime minimisation. Ice central gardens provide visual amenity for the North facing windows, wide spacing from Nelson Grove Road means good airy and sunny southern view. Most vision. I never knew your flat was so spacious. I never knew these flats were so nice’ (Comment from someone visiting to third floor from west end of High Path for the first time). The gardens are also, being a better distance from building than DeBurgh House gardens, attractive for wildlife, we have visiting Robins, Magpie, Crow, Pigeons, Seagulls, Starlings, Sparrows and Wagg. There are fewer birds than there used to be, this is due to loss of nearby tall trees at the 1 Nelson Grove road development and tall dense trees that were where the east end of Will Miles Court was built, nesting habitat needs to be improved, we are prepared to work with professionals to enhance the garden areas. Although tenants don’t have recently been renewed, it is noteworthy that some letterplates are already broken, leading to the conclusion that CHMP do not specify materials for longevity and fitness for purpose.</td>
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<td>180015HP</td>
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<td>Lovell House - Tile Hung in 1960s style with block brickwork not unpleasant to view. 3 Bed maisonettes, 2 bed flats, seem spacious enough to be declared on a regular basis, definitely better than adjoining new build. Could build in same style town house 5 bed to the north of the block without loss of amenity.</td>
</tr>
<tr>
<td>180015HP</td>
<td>Veacock I</td>
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<td>Overall Hillborough, Norfalk and Lovell are rarely considered as part of High Path estate,</td>
</tr>
<tr>
<td>180015HP</td>
<td>Veacock I</td>
<td>High Path</td>
<td>Tower Blocks - Cracking to concrete external faces appears no more than surface stress cracks are not important, give the external a wash down to improve. Some damage to roof from where cedars for double glazing installation works were hung. From a distance, including Wimbleden Hill Road and roads up Wimbleden Hill and Alexander Road, these identify home, externally not displacing having interesting mosaics to masts to fronts. Improvements – build and sell two of penthouse glazed flats to roof level provide ground floor conserve space and convert side accesses to storage spaces to community uses, storage for gardening materials, coffee room, table tennis room etc. Like all tower blocks the ground areas attract gale force winds from the generally prevailing westers. All replacement buildings should have wind flow modelled to ensure not to excess to detriment of persons or chattels. Noted that original kitchen units not as well built as say Norfolk House, drawers have hardboard bottoms rather than plywood for example. Noted that as vacant units pass back to CHMP kitchens, bathrooms and flooring are replaced, weather needed or not it seems. As built space heating by means of gas-fired warm air system (not communal) does work (My Grandmother and Cousin have lived in these blocks in the 70s and 80s), so dammed cold in winter, less so now conventional central heating and double glazed. Kitchens smaller and don’t work as doors but replacement properties seem little gain for the pain involved, unless good justification or estimated physical life left less than 40 years seems to be no point replacing with anything that does not look as nice. 6 Flats on a core level works well, if you like that few internals, one would not like to live in any of these, nor there replacement (but then I don’t like the listed Barbican development of similar age nor newbuild at Chelsea Harper – private or social flats) the staggering across the centre of the estate is interesting view and works well from visual point of view. Larger block works better towards the centre. Basically if it ain’t broke don’t fix it, is as much the class of some people who live there as much as the design of the flats.</td>
</tr>
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<td>Gardens could be built over using VNCA Y Cube design, would enhance area – see Eastfields development already completed we could have housed 12 families by now over all the talking we have had.</td>
</tr>
<tr>
<td>180015HP</td>
<td>Veacock I</td>
<td>High Path</td>
<td>Extremely confusing having block of flats and a road having same names. Someone needs to rename one of them. Brock Close would be topical... Design could have been better but overall 16 foot by 12 foot lounge beds 12 foot by 12 foot and good sized kitchens/diner with plenty of seat hanging etc space in hallways. Difficult to find larger flat in any purpose built block private or council house anywhere in South London or Surrey. Delays in completing original construction from 1959 to 1962 possibly led to some concrete failure by assured by Mr Harold Turner of Merton Housing Department in the 1980s this was not a problem. As long as day-to-day maintenance is completed a budget of £8000 a year on service charges would not be unreasonable to assure this, build lift to stairwells, not impossible. Extend West Flank to turn 2 beds into 4 bed properties for overcoming and south wing toward nelson grove road to create 2/3 bed units and reform doorways there to avoid the ground floor dark spot under overlooked design for crime minimisation. Ice central gardens provide visual amenity for the North facing windows, wide spacing from Nelson Grove Road means good airy and sunny southern view. Most vision. I never knew your flat was so spacious. I never knew these flats were so nice’ (Comment from someone visiting to third floor from west end of High Path for the first time). The gardens are also, being a better distance from building than DeBurgh House gardens, attractive for wildlife, we have visiting Robins, Magpie, Crow, Pigeons, Seagulls, Starlings, Sparrows and Wagg. There are fewer birds than there used to be, this is due to loss of nearby tall trees at the 1 Nelson Grove road development and tall dense trees that were where the east end of Will Miles Court was built, nesting habitat needs to be improved, we are prepared to work with professionals to enhance the garden areas. Although tenants don’t have recently been renewed, it is noteworthy that some letterplates are already broken, leading to the conclusion that CHMP do not specify materials for longevity and fitness for purpose.</td>
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<td>Grove Road development and tall dense trees that were where the east end of Will Miles Court was built, nesting habitat needs to be improved, we are prepared to work with professionals to enhance the garden areas. Although tenants don’t have recently been renewed, it is noteworthy that some letterplates are already broken, leading to the conclusion that CHMP do not specify materials for longevity and fitness for purpose.</td>
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<td>Road requires resurfacing – is listed as adopted road – as patchwork repairs have failed and do not direct rainwater to existing drains correctly.</td>
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<td>180015HP</td>
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<td>Abbey Road – new build does not comply with regulations and condition, particularly on disabled access. Better to acquire and demolish a comprehensive build to the area is imperative.</td>
</tr>
<tr>
<td>180015HP</td>
<td>Veacock I</td>
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<td>Kelsicott House – Better to acquire and put into plan area a truly comprehensive plan is desired, otherwise little justification for demolish and rebuild of Lovell or Norfolk House.</td>
</tr>
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<td>180015HP</td>
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<td>Rodney Place. The line of the curved road isolating the cottages is to be missed and people here use the garages as the small cul-de-sac has little safe parking access. If one is solely talking about building, then the presence of the houses to the east end precludes efficient re-development of High Path site, however under the present plans – which could be enhanced existing if Lovell House is retained as is,</td>
</tr>
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**Note:** More information can be found here: [www.merton.gov.uk/streetnumberingandnaming](http://www.merton.gov.uk/streetnumberingandnaming)
Consultation’s Policy

High Path

Noted. The Urban Design principles (Estates Local Plan part 2) and policies HP1 (townscape) HP2 (street network) and HP3 (movement and access) all contain

Comment

Noted. The rental levels of future business premises will be set by the landowner. While Merton Council support’s the London Plan 2016’s policies (chapter 4)

N/A

Veacock I

High Path

Noted. The role of the Inspector in examining the Estates Local Plan will not involve the legal consideration of previous property transactions.

204015HP

Veacock I

High Path

In Estate and then policy order SD.6b Schedule of representations received at pre submission publication (stage 3) of Merton’s Estates Local Plan December 2016 - February 2017

Reference

There is much in the Estates Local Plan (High Path) to commend it.

residents to feed funds to elsewhere should be permitted. Development should be to quality, with no compromise to the space or

part belong pro-rata to existing freeholders, and no corners cut to overdevelop or build undersize removing space from existing

Key to this is that High Path estate should not be the cash cow for funding other areas. Our profits arising from capital development in

the schemes be provided to the inspector, for reasons of understanding choice of wording.

CHMP and/or Merton Council be provided to the planning inspector. Additionally all briefings to appointed public relations advisors to

was being put in front of them. Additionally all briefing notes internally (excluding costings) between CHMP, Merton Council, All

and this must be included in any new build for commercial classes.

Navigation and signage - A criticism of the existing is difficulties in finding ones way around, and walkways that are designed inducing

fear of crime. These problems can be overcome without wholesale demolition of the site. I have already stated that duplication of

Hillborough Close is confusing, but many signs, and noticeboards provided by CHMP are in the wrong places and not viewed by

95% of the residents. I would welcome the provision of specific guidance for these areas.

Substantial timbers joists and decking and brickwork, minor maintance when not done promptly to rooves can cause problems with flat

roof water ingress, but so they are under used is incorrect, I contacted on behalf of others – with view to rent two garages in early

and depth of bricks used they trick the eye into reducing the height and mass of the blocks, it is good visual design and should be

well, the mix of brick and concrete in the existing towers work well as external finishes, and indeed are similar to chequerboard finish of

smaller households and single persons – sharing in multiple home situations is not dignified when there are plenty of options in the area

street parking ), and provision of differing sizes would be welcome for families, but it is only the 1 Bed flat that is really suitable for

unmarried women. At present there is a need for good quality single persons housing. The development and the provision of offices

for small shops, this is usually only viable when considered as part of a larger shopping centre.

General

Other

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A
The following is a summarization of comments by the "High Path Community Association"'s members regarding the document: "Stations Local Plan Winter 2016/17."

2. Background.
Key Drivers, The Case For Regeneration, The Visions, Urban Design Principles
It is fair to point out that the residents' views were requested by Circe House (Kettering Property CHMP) at regular intervals since the idea of an upgrade of the area was proposed around 2013. Complaints about the repairs and maintenance programme had reached a tipping point and, as social tenants were voicing concerns such as "turf it down," pull it down and start again," in relation to a quick fix for restoring a well rounded aesthetic pride to the area, we need to note that they never knew what the work on the estate meant.

The latter remark has been a constant theme throughout this entire process and moving forward it is hoped that the Secretary of State and whoever is heading up strategic positions for the entire timeline of the estate will bring about an energy to regenerate an area such as those allocated (High Path, Ravensbury and Eastfields) for new works. Pop-up exhibitions on the estate were strategically planned and passed by were asked their views as to how they felt about the state of the area.

4.5 - P176 - I am concerned that there is a danger that different phases of development have their own character may in itself lead to a mismatch in design rather than mitigate the concern over monotony.

We anticipate a wholesale improvement on the woeful promises (eg '91 Promises' and '10 Commitments') made by the resident provider in this regard as it is noted in the draft document of the stock transfer "WOULD MERTON PRIORY HOMES DO ANY WORK IN THE LOCAL COMMUNITY? Yes.

Merton Priory Homes would work closely with residents, local councils and public bodies like social services, education, the police, the health authority, GPs and voluntary agencies to help local communities tackle problems and improve the quality of life for residents. (Consultation on the proposal to transfer Merton Council's homes to Merton Priory Homes - Appendix 3, 2008/9)

We have noted that at CHMP have not engaged with Merton NHS CCG as a community partner to the level we deem appropriate for a project of this magnitude, there is a concern on the part of not just the community on the whole and the services we use, if it is assumed a near tripling of the population is to go ahead as preferred that in this context, we have a heightened concern for the increasing population of the elderly and the indigenous vulnerable cohort. Moreover CHMP have sought to remove staff for this particular service last year (June 2016) as it was not considered appropriate or within their remit as a resident provider and this was partly due to their inability to engage with the areas they covered (East and West Merton, aka Merton Central). We need also to point out that in view of financial challenges in adult social care and the mitigating financial issues for the NHS in general then a more robust level of discussion needs to be had with the respective agencies related to health and well-being in our community.
### High Path Community Association

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<td>25602HCA</td>
<td>High Path Community Association</td>
<td>High Path</td>
<td>Executive summary</td>
<td>General</td>
<td>N/A</td>
<td>Noted.</td>
</tr>
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**As a community we endorse a regeneration but this needs to be delivered in a manner that is in keeping with the implicit wishes of the community on the whole. Agreed and sound example of this can be found in the paper: Estate Regeneration National Strategy, December 2016 Department for Communities and Local Government.**

### High Path Community Association

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<td>25602HCA</td>
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<td>High Path</td>
<td>S. Residents’ involvement in the management of estates</td>
<td>Other</td>
<td>Planning application</td>
<td>Noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group’s initial proposals and the Estates Local Plan.</td>
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The ongoing management of the estate is vital to its sustainability. Residents should have the opportunity to participate in the ongoing management of the regenerated estate. In some cases this may be through a formal tenant or resident management organisation or through a resident-led board. Ongoing opportunities should be provided for residents to influence decisions and develop the necessary skills to take on more responsibility for the management of their estate. 

Where elected or self-selected residents represent the estate, landlords should provide them with the resources to communicate and engage with all residents to ensure their representative approach is inclusive. This could include a place to meet or computers for preparing and distributing communication materials. (Estate regeneration schemes can play an active role in identifying community facilities which can be owned and managed by resident and community groups. Where community assets are run by the community, people are more likely to have an active and sustainable voice in their neighbourhood. It is also important to undertake post-occupancy evaluation to understand the impact of regeneration, and to demonstrate ongoing commitment to engage with residents by acting on the results of any evaluations. This maintains trust with the local community, and encourages social sustainability and community cohesion. It is important as the aforementioned is the need for clear and transparent dialogue between the provider resident, local authority and the residents. In particular is the Council’s recent proposal with Harris Academy to build a secondary school on the area of South Wimbledon. We oppose such a venue as not only is it too small to accommodate the needs of its pupils but the proposed regeneration makes no mention of it and all affected stakeholders are urged with anxiety, embarrassed by the impact of such a venture. Married to this is the large contingent of disadvantaged young people who attend the local primary school that live on the estate and the neighbouring district therein is folly of the Department of Education and smacks of desperation on the part of the Council to entertain such a proposal. 

If any of the adjacent stakeholders considered such a proposal it is because they were not aware of the massive undertaking by the resident provider and as such the general conservation was as disjointed as we had previously noted in the consultation back in 2013. The head teacher of the local primary school was unaware of the proposed increase of the density of the estate as was the manager of the Resource centre which houses groups for those with learning difficulties and estate as was the manager of the resource centre which houses groups for those with learning difficulties and the resident provider is unaware of the significantly high proportion of traffic, footfall, problems at bus stops and underground stations, local supermarkets with more than 1000 children entering and leaving the estate at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.

We raised objections to the most recent consultation which was the proposed purchase and regeneration of the Old Lampworks in High Path. This was considered the impact of Merton Priory has not been discussed in their consultation back in 2013. The head teacher of the local primary school was unaware of the proposed increase of the density of the estate as was the manager of the Resource centre which houses groups for those with learning difficulties and the resident provider is unaware of the significantly high proportion of traffic, footfall, problems at bus stops and underground stations, local supermarkets with more than 1000 children entering and leaving the estate at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.

The main reason is that Merton Priory has not considered the impact of Merton Priory to build a 1000 place school on the estates (see enclosed article from Wimbledon Life). As the last meeting I attended they were not aware of the school being built.

It is rather strange that the housing association and Merton Council has decided to exclude the proposed Harris Academy Secondary School development on High Path from all their documents.

It is rather strange that the housing association and Merton Council has decided to exclude the proposed Harris Academy Secondary School development on High Path from all their documents.

The impact of a new proposed secondary school on High Path, is not mentioned anywhere in the whole document, and will have a detrimental and devastating effect on the current and future residents, the entire High Path regeneration project, anti-social behavior and order and situation and an adverse effect on other residents of Merton passing through High Path. For example, extra traffic, footfall, problems at bus stops and Underground stations, local supermarkets with more than 1000 children entering and leaving High Path at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.

Thank you for your letter inviting us to view the ‘Pre-Submission Estates Plan’.

Our main concern, that we would like to see reflected before submission, is that the plan does not seem to reflect the most recent proposals which have been agreed and objected to for the Old Lampworks in South Wimbledon. The issues that you have raised were considered as part of this assessment.

The Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group’s initial proposals and the Estates Local Plan.

Note: The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group’s initial proposals and the Estates Local Plan.

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**In Estate and then policy order**
The entire project is skewed in favour of Chris Housing and Merton Council, but not in favour of independent residents of freehold houses and leaseholders of Merton, for example Pensil Road terraced houses. The High Path local plan must not be inferior to any other housing standards applicable to other houses in Merton. The so-called acute need for more houses in London must not be used as a divisive Council budgets at the expense of current freehold and leaseholder owners of High Path. London Mayor’s minimum housing standards, density and parking restrictions must not be used to lower our current and better standards of housing and parking facilities.

If our current housing standards and facilities cannot be improved by the regeneration project than please do not rob us of what we have got now.

We assume that Traffic Impact Studies have been carried out and the proposals have no negative impact on the current traffic?

There was little in the Estates Local Plan regarding the internal living space. For example, no mention was made of the size and shape of the rooms, the number of bedrooms and bathrooms, the size of the living areas, the condition and quality of the finishes, and the presence of essential services.

The proposal appears to indicate an increase in the housing density which would mean increased congestion to the area and an increase in the pollution. Merton High Street, and the surrounding areas are already very polluted, anything that will increase the congestion must be avoided. The housing density must be decreased.

It has been considered appropriate for a Secondary school to be located next to the primary school in High Path. I understand that at the moment there are over 400 children in the primary school and that in excess of 1000 pupils will be accommodated in the proposed Secondary school.

My concern is that there is already difficulty for parents to park in the one way High Path both for dropping their children off to attend school and even more so when collecting them when school is over for the day. Has consideration been given to the changes which will occur when another 1000 children arrive and leave at the same time, some of whom will be dropped by parents and some arriving by public transport.

I live in the Path and can only imagine the size of so many children crossing the area both arriving and leaving, plus parents attempting to park at the same time. Nowhere to park - insufficient public transport - safety – the possibility of road rage as a consequence – frustration - 5 days each week. Am I alone in worrying about the inevitable chaos?

The minds boggles and I would like to receive your alternative view, if you have one, as an attempt to put mine and I’m sure many other minds at rest.

Planning should ideally be of British National plants, that will encourage native wildlife, subject to such wildlife or plants (trees not being injurious to health affecting skin, breathing or toxins from accidental consumption of flowers or berries). Ideally they should be managed to ensure growth is not excessive, and complementary for bloom and foliage and providing nesting and food source for birds.

If our current housing standards and facilities cannot be improved by the regeneration project than please do not rob us of what we have got now.

If in February 2017 planning permission was granted for the former police office on Pincott Road to change use into a community centre. The centre will be run by South Wimbledon Community Association. Policy EP.14 Land Use (a) recognises the potential for commercial and community uses within a redeveloped High Path.

Area is located in Merton Place Archaeological Priority Area therefore any developer will be required to investigate with an qualified archaeological expert. In planning terms the Homes at High Path will be required to demonstrate that they adhere to the planning policies on housing size in place at the time of any planning application, as with any other development proposal in Merton.

Design

Transport Planning application

Policy Area Planning Officers

170315HP Vearock I High Path

Planning application

Consultation

Other Planning application

170315HP Vearock I High Path

Consultation

Transport Planning application

Reference

Consultation/Smart Survey

Comment

Policy Area

Policy Officer Response

170315HP Vearock I High Path

Consultation

Transport Planning application

Noted. The homes at High Path will be required to demonstrate that they adhere to the planning policies on housing size in place at the time of any planning application, as with any other development proposal in Merton.

Noted. The council, as the Local Education Authority, monitors school intake annually and plans for the future. Current projections indicate that Merton has significant development nearby.

Design

Transport Planning application

Note. Planning applications will be considered against the Estates Local Plan and Merton's other adopted Local Plan policies for managing development, including policy DM.02 Nature conservation, trees and hedge features of Merton's Sites and Policies Plan, Section (d) of which states "Proposals for new or replacement trees, hedges and landscape features should consist of appropriate native species to the UK."
Paragraph 3.242 pg. 150: The current site analysis might be correct at this time, however, with the proposed new school to be built on High Path in the very near future, this needs to be taken into account in the site analysis.

Design Planning application

Noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group’s initial proposals and the Estates Local Plan.

22003THP Cohen E High Path

As with most new builds the building design is typical of the London standard and though we empathise with PRP’s desire to have a modern outlook we regard this as an opportunity to keep back the past and refer to the curves of yesterday for the facades of the buildings instead of the cold, Brutal preference. A way around this would be to work with another company of architects as PRP seem intent on stamping their Goldfingeresque footprint around the city. Most of the staff of said company have been laissez-faire and uninvolved when residents have opened up the conversation in public events to different designs to their own and this has not been lost by the indigenous population. Thus proposals have brought with them some contentious thoughts and this needs to be needed upon and the task repeated because a number of residents have misgivings as to the authenticity of surveys conducted by the likes of Savills.

Design Planning application

Noted.

2580HPCA High Path Community Association High Path

A palette of surface materials and street furniture should be developed complementary to their context. The detailed material palette will be assessed through the planning application process at which time we will welcome complementary to their context. The detailed material palette will be assessed through the planning application process at which time we will welcome.

Design Planning application

Noted. Planning for Spur House was refused at Merton’s Planning Application Committee, the applicant appealed the refusal and the appeal was allowed against the council’s wishes.

24803THP Cohen E High Path

4.16 - P178 - Ensure that street furniture does not hinder the path of pedestrians especially, for example, people pushing buggies, pulling shopping trolleys or mobility scooters.

Design Planning application

Noted. Determination of materials, will be considered as part of the planning application process.

2580HPCA High Path Community Association High Path

In accordance with this are the materials for the build and given that we are supposedly a long way off we would ask that in the forthcoming workshops the leading designers look to incorporating sustainable materials for the proposed works. We say this because convention says that as this is a multi-million proposal the big companies will utilise the usual mediums to frame our new homes. This is an opportunity to work with materials and train residents within the process. If the intention is to rebuild the estate for more people and have homes that perform holistically then why not look at buildings such as lime and straw? Our concern is that because of the urgency to appease central government and meet the targets for housing those in need that this will be a big moment lost. Working with what we know is the prevailing narrative amongst builders of this type of estate and not being ground breaking will not allow the opportunity to work with materials and train residents within the process. If the intention is to rebuild the estate for more people and have homes that perform holistically then why not look at buildings such as lime and straw? Our concern is that because of the urgency to appease central government and meet the targets for housing those in need that this will be a big moment lost. Working with what we know is the prevailing narrative amongst builders of this type of estate and not being ground breaking will not allow the opportunity to work with materials and train residents within the process.

Design Planning application

Noted. The Ravensbury part 3 “site analysis and planning policies” contain a number of photos including of the raised flower beds outside Ravensbury Grove and the open / green spaces around Hengelo Court.

2600HPCA High Path Community Association High Path

The materials are there and readily available and presently going to waste - residents living in these homes will have lower fuel bills and the surrounding area will benefit with the reduced offset of pollution should we decide to build with such organic materials.

Design Planning application

Noted. We would encourage engagement on materials prior to any planning application being submitted and will pass this onto to Clarion Housing Group.

0510010P Sheppard A Ravenswood

I’ve had a quick look through the Estate local plan regarding Ravensbury Estate and would like to highlight three points. Firstly, photos of the estate show just about the most shoddy and down-at-heel section of the estate - in Rutter Gardens. There are no photos showing the trees and lovely open green area in front of the community centre, the raised flower beds at the end of Ravenswood Grove (near the garage) or the other open green spaces around Hengelo Gardens and Ravenswood Court. If the more typical / prettier parts of the estate are shown, why not show what we know is the prevailing narrative amongst builders of this type of estate and not being ground breaking will not allow the opportunity to work with materials and train residents within the process. If the intention is to rebuild the estate for more people and have homes that perform holistically then why not look at buildings such as lime and straw? Our concern is that because of the urgency to appease central government and meet the targets for housing those in need that this will be a big moment lost. Working with what we know is the prevailing narrative amongst builders of this type of estate and not being ground breaking will not allow the opportunity to work with materials and train residents within the process.

Design Planning application

Noted. The Ravensbury part 3 “site analysis and planning policies” contain a number of photos including of the raised flower beds outside Ravenswood Grove and the open / green spaces around Hengelo Court.

122003RP Ravenswood Residents Association Ravenswood

Case is made, p. 81 para 2.243 (page 150) regarding the revision of the Ravenswood Court flats. At all stages of this consultation, many residents have said that this is a ridiculous idea, but Merton Council have chosen to retain this idea even at Stage 3, showing lack of regard to consultation responses.

Design Planning application

Agreed. Recommendation Minor modification 24 Paragraph 3.243 pg 150 “Development proposals should consider allocation of the internal areas of this, ground floor flats on Ravenswood Court to accommodate the floor plans shown in plan of part of the block. Changes to the layout of the rear of these retained flats could also improve parking and provide some private back gardens” At the time of the preparation of this plan, there are currently no
Consultation’s Officer Response

Ravensbury

2. Street network R2
Noted. Assessed proposal minor modification (to Policy R5 Open Space justification, para 3.275, page 162) to clarify the update regarding the designated open space at the end of Ravensbury Gardens.

"The relatively small portion of designated open space adjacent to Ravensbury Park is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality. In September 2018, Merton Council’s Planning Applications Committee resolved to grant permission for a scheme in this location (Ref 16/P7264). Should a decision notice be issued and this scheme be capable of being delivered, then this will have a bearing on the designation of open space at this location."

1. Townscape R1
Noted. The council’s Estates Local Plan is based on a site analysis of the Ravensbury Estate and the area in which is site is. The vision for Ravensbury is based around a suburban parkland setting. The policies in the Estates Local Plan for Ravensbury focus on maintaining the seeded parkland setting set out in the Ravensbury Estate. The Estates Local Plan will not see the setting of the area nor will it result of quality public space nor will it result in net loss of affordable housing.

Ravensbury

3. Movement Policy (to Policy R5 Open Space justification, para 3.275, page 162) to clarify the update regarding the designated open space at the end of Ravensbury Gardens.

6.0 Policy EP R3: Movement & Access
Noted. There are no definitive proposals for a new vehicular access onto Morden Road. As stated in paragraph 2.352, "This policy section [EP R3 Street network] is about the creation of clearly defined and understood streets. It does not define vehicle movement. This is addressed by policy EP A3. Paragraph 2.352 states New street network proposals should be well designed to prove clear connections that will reduce the current detour. As stated in paragraph 2.352, "This policy section [EP R3 Street network] is about the creation of clearly defined and understood streets. It does not define vehicle movement. This is addressed by policy EP A3. Paragraph 2.352 states New street network proposals should be well designed to prove clear connections that will reduce the current detour."

Transport
Noted. There are no definitive proposals for a new vehicular access onto Morden Road. As stated in paragraph 3.256, "The open space must be of high quality, the area that should be preserved is only for the benefit of the residents. Ravensbury Grove will need speed attenuation measures in order to reduce speeding in future. There is little mention in this report of planning permission for Ravensbury Garages has already implied that the actual quality of the space is a feature that is lacks proper preservation."

Inclusion of another crossing at the junction of Wandle Road would be preferable due to the fact that many people attempt the crossing. We feel that there has been no suggestion to improve links with Morden in terms of crossing Morden Road. Removal of the current crossing and moving it towards the Surrey Arms help-lower usage but does nothing to encourage the safer passage of commuters. Inclusion of another crossing at the junction of Wandle Road would be preferable due to the fact that many people attempt the crossing. We feel that there has been no suggestion to improve links with Morden in terms of crossing Morden Road. Removal of the current crossing and moving it towards the Surrey Arms help-lower usage but does nothing to encourage the safer passage of commuters.

"However, it is important not to make the estate over-permeable as this will undermine seclusion for residents and dispense movement and activity without any real gains in wider connectivity."

Transport
Noted. There are no definitive proposals for a new vehicular access onto Morden Road. As stated in paragraph 2.352, "This policy section [EP R3 Street network] is about the creation of clearly defined and understood streets. It does not define vehicle movement. This is addressed by policy EP A3. Paragraph 2.352 states New street network proposals should be well designed to prove clear connections that will reduce the current detour."

"It is considered that this decision supersedes proposed Policy EP R5(a) and Minor Modification 29 is recommended to clarify this: designate these proposed pieces of land for open space use. It is considered that this decision supersedes proposed Policy EP R5(a) and Minor Modification 29 is recommended to clarify this:"

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Our residents back this concept and feel that the theme of permeability is suggested in terms to the benefit of the Ravensbury estate.

The policies in the Estates Local Plan for Ravensbury focus on maintaining the secluded parkland setting set out in the Ravensbury Estate. The Estates Local Plan will not see the setting of the area nor will it result of quality public space nor will it result in net loss of affordable housing.

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Transport
The proximity of the Ravensbury Estate to the river Wandle and Ravensbury Park mean that there are good opportunities to restore the river Wandle through the park or undertake enhancements to improve the condition of the river as part of major redevelopment adjacent to it. Currently, the river is impounded and subject to a number of problems such as mites which have been problematic on a yearly basis. Redvelopment of the area provides an opportunity to improve the park and consider river restoration and enhancement to create a better functioning river and river corridor. This is recognised on paragraph 3.282, which we welcome.

In paragraph 3.291, the use of open swales could suggest the use of gravel, but we do not think this particularly suit the estate character. In paragraph 3.289 we think it advisable to agree where the top of the bank of the main river actually lies, and to consider the existing flow paths could be exacerbated by the incorrect provision of roads and openings on to Morden Road. Provision should be made to reduce flood risk and to maintain river habitat. Green roofs could be incorporated but there seems to be no mention of this.

Gardens and even homes themselves should be designed to actively promote wildlife in the form of birds, invertebrates and small mammals. Green roofs could be incorporated but there seems to be no mention of this. The proximity of the Ravensbury Estate to the river Wandle and Ravensbury Park mean that there are good opportunities to restore the river Wandle through the park or undertake enhancements to improve the condition of the river as part of major redevelopment adjacent to it. Currently, the river is impounded and subject to a number of problems such as mites which have been problematic on a yearly basis. Redvelopment of the area provides an opportunity to improve the park and consider river restoration and enhancement to create a better functioning river and river corridor. This is recognised on paragraph 3.282, which we welcome.

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<td>Skeight B</td>
<td>Ravensbury</td>
<td>Re: Part D3, p37 EP R8 Building heights; justification 3.10.1 Reference to the existing buildings in vicinity of Ravensbury garages should be made in relation to the views to the tree-line from the existing buildings.</td>
<td>Design</td>
<td>B, Building Heights RB</td>
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<td>008100EP</td>
<td>Skeight C</td>
<td>Ravensbury</td>
<td>11.0 Policy EP R8: Building heights We think that 'taller buildings must be located around the edge of the estate' is open to misinterpretation, and that more specifically Morden Road should be defined as the location for slightly higher buildings. Ravensbury Grove must not receive taller buildings and neither must the southern boundary with Ravensbury Park. It should be noted that Ravensbury Court is actually a part 3 and part 4 storey building. The part 3 storey is closer to the park and does not attempt to compete with the surrounding tree canopy. This should inform future buildings to not exceed 3 storeys in height. The 4 storey element of Ravensbury Court actually serves to screen the industrial estate. Therefore any building in 4 storeys in height will effectively screen the tree canopy of Morden Hall Park and Ravensbury Park, which should be fully proscribed. We think it unfortunate that no mention of storey heights has been made in section EP R8. The character of Ravensbury is made up of the scale of the buildings. Airing Ravensbury Grove, buildings should not exceed 3 storeys, preferably with the superstore being contained within the roof. In fact 3 storeys incorporating roof space living is an ideal height around Ravensbury as it enables higher density without excessively impacting on the character and environment. Morden Road could be employed to good use in this respect. ( / is important not to compete with the 4 storey element of Ravensbury Court in this area. ) Secondly, the photos in the 'The Vision' section, suggesting what the Ravensbury estate could look like (page 34), show mainly low-level buildings. These are to be bulldozed &amp; replaced by high-rise blocks. No one who lives on the estate wants high-rise blocks. We do not want to lose the current amount of open space or the low-level buildings which encourage a sense of community. The only valid purpose of these high-rise, wind-tunnel, community destroying blocks is to cram more people onto the estate...something that no one living on the estate wants.</td>
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<td>120040EP</td>
<td>Ravensbury Residents Association</td>
<td>Ravensbury</td>
<td>3.0 Previous Responses to Stage 2 It should be noted that we have received extensive responses to Stage 2 of the Local Plan, but have observed that some of these points have been ignored by Merton Council and their Future Merton team at Stage 3. These responses will not be extensively repeated here but we hope they will be reviewed by the Planning Inspector.</td>
<td>General</td>
<td>N/A</td>
<td>Noted. All of the representations raised at Stage 2 were considered in preparing the Estates Local Plan (see Statement of Consultation SD6). In recognition that the Ravensbury Residents Association response contains many useful diagrams and images to explain the points made in text which do not appear in the summary of representations, the Council has included the full copy of the stage 2 and stage 3 representations from the Ravensbury Residents Association as an appendix to the Statement of Consultation SD6. You can find all of the representations received at Stage 2 consultation (Feb-Mar 2016) and stage 1 (Sept-Nov 2014) are submitted separately as part of the examination (SD6)</td>
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**Minor Modification 29 recommended:** Policy EP R8 (second para, page 172) "To ensure this will not compete with the existing Ravensbury Court Rate", Policy EP RB "Building heights" states ‘while there is a need to increase density, to do too much would undermine the landscape character of the area. Building heights must not compete with established mature trees which envelope the estate. Any strategies for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area’.

**Minor Modification 30 recommended:** Policy EP RB (second para, page 322) "at the existing Ravensbury Court Rate", Policy EP RB "Building heights" states ‘while there is a need to increase density, to do too much would undermine the landscape character of the area. Building heights must not compete with established mature trees which envelope the estate. Any strategies for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area’.

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**SD6 Schedule of stage 3 pre-submission reps in policy order_9E0A038**

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<th>Policy Area</th>
<th>Policy</th>
<th>Officer Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>016008EP</td>
<td>Ravensbury Residents Association</td>
<td>Ravensbury</td>
<td>7. Landscape R7 Nothing has been said of the extensive area at the southern end of Ravensbury Grove and how the Ravensbury area will be made worse by the overdevelopment of this uniquely sensitive area. Excessive height here will impact on the entirety of Ravensbury estate and will also damage the park itself. The public views here should be mostly retained, otherwise they will be lost forever. We have included our response to the planning application in this copy many of the salient points in regards to Landscape in Ravensbury. Please see Appendix 3.0, attached separately.</td>
<td>Environment</td>
<td>7. Landscape R7</td>
<td>Noted. No change proposed. Policy EP RB states that building heights in the vicinity of Ravensbury Garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.</td>
</tr>
<tr>
<td>133004EP</td>
<td>Ravensbury Residents Association</td>
<td>Ravensbury</td>
<td>Ravensbury Grove at the southern end of Ravensbury Grove. At first this area was barely even referred to in the draft Local Plan, due to Merton Council’s desire to sell off the site as quickly as possible. &amp; thereby advancing the push for demolition of the Ravensbury Estate. This area has now been granted planning permission in advance of the Local Plan being finalised. This seems to be an attempt to usurp the regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality. Should a decision be issued on this.</td>
<td>Design</td>
<td>B, Building Heights RB</td>
<td>Noted. No change proposed. Policy EP RB states that building heights in the vicinity of Ravensbury Garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.</td>
</tr>
<tr>
<td>133004EP</td>
<td>Ravensbury Residents Association</td>
<td>Ravensbury</td>
<td>I would like the Planning Inspector to request copies of all of these Stage 2 responses in order to independently ascertain to what extent the residents themselves. &amp; other stakeholders are supported by the representations. It also appears that conversations between the council and their housing partner Circle Housing (now Clarion/Latimer) have exerted substantiation relative to the actual experience of living in Ravensbury the residents themselves.</td>
<td>General</td>
<td>N/A</td>
<td>Noted. No change proposed. Policy EP RB states that building heights in the vicinity of Ravensbury Garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.</td>
</tr>
</tbody>
</table>
The fact that the site will remain open will meet with the council’s future intent on a regular basis only serves to muddy any possible concept of importance during the assembly of the Estates Local Plan. We therefore hope that the information we have provided enables the independent Planning Inspector to judge this document appropriately & fairly.

Noted. As encouraged by rational guidance and good practice, this council’s officers met with many different stakeholders as possible during the preparation of the Estates Local Plan, Clarion Housing Group, statutory consultees and other interested parties of all whom helped to shape the Estates Local Plan. This is set out in the council’s Statement of Consultation.

Thirsk, I understand that parking will be reduced in the current plans, though this is not made clear in the stage 3 Local estates plan at all. Parking is already quite difficult around the estate. Reducing parking spaces and increasing residents will make the situation very stressful, and could, I imagine will lead to residents parking permits etc, something else that no one wants.

It’s a shame that Merton Council and Circle Housing are so focused on meeting government housing targets that the continued pleas of Ravensbury Residents Association should be explored

A minor modification that reference is also made to cycle parking conforming with London Plan minimum standards. For example, paragraph 2.46 “active design” “The design of new development and streets must promote active design. This approach incorporates local facilities that are easily accessible on foot or cycle, and create good quality well maintained and safe places with convenient and direct routes through the development.” These issues are also woven throughout the Estates Local Plan.

In order to achieve a sustainable development the government has defined three fundamental dimensions: economic, social and environmental (National Planning Policy Framework (NPPF), page 2, paragraph 7). Crime has a direct impact on all three dimensions. NPPF section 7.  ‘Securing good design, paragraph 58 requires local authorities to produce ‘Local and neighborhood plans’ with a specific aim to ‘create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion’’ … ‘Development should reduce the opportunities for criminal behavior and contribute to a sense of security without being overbearing or intimidating’ … ‘Measures to design out crime should be integral to development proposals and be considered early in the design process, taking into account the principles contained in Government guidance on “Safer Places” and other guidance such as Secured By Design published by the police.” In the interest of creating safer, sustainable communities Secured by Design principles and practices should be incorporated within the Estates Local Plan for Eastfields, High Path and Ravensbury and the development carried out in accordance to those details. By working with the local Met Police Designing Out Crime Officers I am sure accreditation could be achieved

These are requirements as they give an indication of the information the Council requires in order to assess any application. Proposed Modification 32

Amend as shown

Remove subheading GLOBAL before Paragraph 4.5

The PTAL rating at High Path varies across the site from between 4 and 6. Eastfields and Ravensbury also have a PTAL rating of up to 3, and at Eastfields there is potential for this to improve through an increase in Thameslink services. These more accurate PTAL ratings could be recognised in the draft Local Plan rather than the blanket figure currently set out for each estate.

3. Movement and Access E3 H2 R3

Agreed. Proposed Modification 08

Endfield Para 3.16 page 52 Amend as follows ‘... mean that the Public Transport Accessibility Level (PTAL) area having a PTAL Level of 4 or greater’...” To Morden Road reduces accessibility. Within the estate the PTAL is rating varies between 3 and 2.”

Modification 12 High Path para 107 page 30

Amend as shown

“area having a PTAL Level of 4 to 6. ”

Modification 22 Ravensbury paragraphs 3.237 page 137 Amend as shown

To Morden Road reduces accessibility. Within the estate the PTAL is rating varies between 3 and 2. On Morden Road it is 3

Proposals to increase Thameslink service frequencies remain unfunded but should services increase significantly (enough to raise PTAL) during the lifetime of the Estates Local Plan, then the revised PTAL could be taken into account in the planning applications stage.

Transport

2. Street Network E2 H2 R2

Noted. The “Urban Design Principles” (Part 012) of the ELP which apply to all three estates are all founded on the principles of Security by Design, including active frontages, defensible space, permeable, legible and accessible layouts. For example, paragraph 2.46 “active design” “The design of new development and streets must promote active design. This approach incorporates local facilities that are easily accessible on foot or cycle, and create good quality well maintained and safe places with convenient and direct routes through the development.” These issues are also woven throughout the Estates Local Plan.

Traffic

2. Street Network E2 H2 R2

Noted. The “Urban Design Principles” (Part 012) of the ELP which apply to all three estates are all founded on the principles of Security by Design, including active frontages, defensible space, permeable, legible and accessible layouts. For example, paragraph 2.46 “active design” “The design of new development and streets must promote active design. This approach incorporates local facilities that are easily accessible on foot or cycle, and create good quality well maintained and safe places with convenient and direct routes through the development.” These issues are also woven throughout the Estates Local Plan.

SD6 Schedule of representations received at pre submission publication (stage 3) of Merton’s Estates Local Plan December 2016 – February 2017

SGA Schedule of stage 3 pre submission reps in policy order_065A38

In Estate and their policy order

| Reference | Consultation’s Response | Estate | Comment | Policy Area | Policy | Officer Response |
|-----------|-------------------------|-------|---------|------------|------|-----------------
| 15SD04RP | Ravensbury Residents Association | Ravensbury | The fact that the site will remain open will meet with the council’s future intent on a regular basis only serves to muddy any possible concept of importance during the assembly of the Estates Local Plan. We therefore hope that the information we have provided enables the independent Planning Inspector to judge this document appropriately & fairly. | General | N/A | Noted. As encouraged by rational guidance and good practice, this council’s officers met with many different stakeholders as possible during the preparation of the Estates Local Plan, Clarion Housing Group, statutory consultees and other interested parties of all whom helped to shape the Estates Local Plan. This is set out in the council’s Statement of Consultation. |
| 05SD01RP | Shellard A | Ravensbury | This is a shame that Merton Council and Circle Housing are so focused on meeting government housing targets that the continued pleas of Ravensbury Residents Association should be explored | Transport | Planning application | Noted Parking provision must meet London Plan standards for a highly accessible location this will mean reduced levels of parking provision. Measures will be put in place at the time of each planning application to manage demand and how spaces are used in accordance with the use of home that is being built. |
| 010004NP | Met Police | Three | In order to achieve a sustainable development the government has defined three fundamental dimensions: economic, social and environmental (National Planning Policy Framework (NPPF), page 2, paragraph 7). Crime has a direct impact on all three dimensions. NPPF section 7.  ‘Securing good design, paragraph 58 requires local authorities to produce ‘Local and neighborhood plans’ with a specific aim to ‘create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion’’ … ‘Development should reduce the opportunities for criminal behavior and contribute to a sense of security without being overbearing or intimidating’ … ‘Measures to design out crime should be integral to development proposals and be considered early in the design process, taking into account the principles contained in Government guidance on “Safer Places” and other guidance such as Secured By Design published by the police.” In the interest of creating safer, sustainable communities Secured by Design principles and practices should be incorporated within the Estates Local Plan for Eastfields, High Path and Ravensbury and the development carried out in accordance to those details. By working with the local Met Police Designing Out Crime Officers I am sure accreditation could be achieved | Design | 2. Street Network E2 H2 R2 | Noted. The “Urban Design Principles” (Part 012) of the ELP which apply to all three estates are all founded on the principles of Security by Design, including active frontages, defensible space, permeable, legible and accessible layouts. For example, paragraph 2.46 “active design” “The design of new development and streets must promote active design. This approach incorporates local facilities that are easily accessible on foot or cycle, and create good quality well maintained and safe places with convenient and direct routes through the development.” These issues are also woven throughout the Estates Local Plan. |
| 011D03NP | Met Police | Three | The PTAL rating at High Path varies across the site from between 4 and 6. Eastfields and Ravensbury also have a PTAL rating of up to 3, and at Eastfields there is potential for this to improve through an increase in Thameslink services. These more accurate PTAL ratings could be recognised in the draft Local Plan rather than the blanket figure currently set out for each estate. | Design | 2. Street Network E2 H2 R2 | These are requirements as they give an indication of the information the Council requires in order to assess any application. Proposed Modification 32

Amend as shown

Remove subheading GLOBAL before Paragraph 4.5 |
| 15SD05AV | Savills / Claireton / Latimer | Three | Design Requirements (Pg 174 – 176) – This section of the draft ELP provides “detailed guidance to applicants that they will be expected to focus on in more detail to demonstrate that the Vision, Urban Design Principles and Site-Specific Policies of the Plan can be delivered”. | Design | 2. Street Network E2 H2 R2 | These are requirements as they give an indication of the information the Council requires in order to assess any application. Proposed Modification 32

Amend as shown

Remove subheading GLOBAL before Paragraph 4.5 |
| 144D05AV | Savills / Claireton / Latimer | Three | These requirements as they give an indication of the information the Council requires in order to assess any application. Proposed Modification 32

Amend as shown |
| 3. Movement and Access E3 H2 R3 | Transport | 3. Movement and Access E3 H2 R3 | Agreed. Proposed Modification 08 Endfield Para 3.16 page 52 Amend as follows ‘... mean that the Public Transport Accessibility Level (PTAL) ...” To Morden Road reduces accessibility. Within the estate the PTAL is rating varies between 3 and 2.” |
| 21B006AV | GLA | Three | Transport Issues

1% welcomes the reference to estate car parking being provided in accordance with London Plan maximum standards wand would recommend that reference is also made to cycle parking complying with London Plan minimum standards. As stated previously, TfL would encourage the estate street networks to accord with TfL’s Street Types guidance. |
| 21B006AV | GLA | Three | Transport Issues

1% welcomes the reference to estate car parking being provided in accordance with London Plan maximum standards wand would recommend that reference is also made to cycle parking complying with London Plan minimum standards. As stated previously, TfL would encourage the estate street networks to accord with TfL’s Street Types guidance. |
| 219006AV | GLA | Three | High Path

Page 106 “Future extensions of the north-south streets ending at High Path southwards towards to Merion Way must be a possibility, subject to TfL’s support” TfL would recommend that “most is replaced with ‘should be explored’” As stated previously TfL would unlikely be prepared to support additional vehicle access points onto Merion Way. | Transport | 3. Movement and Access E3 H2 R3 | Agreed. Minor modification 13 proposed Policy EP 12 Street Network E2: Future extensions of the north-south streets ending at High Path southwards towards to Merion Way should be explored subject to TfL’s support.” |
Consultation's In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough.

Comment Three Three Three GLA Natural England Sport England

SD.6b Schedule of representations received at pre submission publication (stage 3) of Merton's Estates Local Plan December 2016 - February 2017

270000NE Natural England

Minor Modification 6 Page 64 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton’s Core Planning Strategy, London Plan 2016 and Sites and Policies Plan.

Minor modification 5 Paragraph 2.26b (new 2.28) The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton’s Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton’s Local Plan.

Minor modification 5 Paragraph 2.26b (new 2.28) The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton’s Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton’s Local Plan.

Minor modification 5 Paragraph 2.26b (new 2.28) The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton’s Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton’s Local Plan.

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Minor modification 5 Paragraph 2.26b (new 2.28) The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton’s Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton’s Local Plan.
Consultation’s Planning decisions
LDF Preparation

7. Landscape

Officer Response
Environment Agency

Three

We note that reference is made to the National Planning Policy Framework (NPPF) in relation to flood risk, and that it will be necessary to comply with the Sequential and Exception Tests as appropriate, and also the necessity of producing site specific Flood Risk Assessments to accompany detailed plans for the redevelopment of these areas.

Environment

Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London PlanPolicy 7.24 Blue Ribbon network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.

6. Environmental Protection EQ HE RG

10100008 Environment Agency

Three

Thank you for consulting Sport England prior to the consultation on the preferred options version of the above document. Sport England is the Government agency responsible for delivering the Government’s sporting objectives. Maximising the investment into sport and recreation through land use planning is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. In response to the below email, Sport England would like to make the following comments:

Environment

Noted.

6. Environmental Protection EQ HE RG

20200005 Sport England

Three

SD.6b Schedule of representations received at pre submission publication (stage 3) of Merton’s Estates Local Plan December 2016 - February 2017

268000NE

157000SAV

152000SAV

Latimer

Latimer

Latimer

(Paragraph 2.59) identifies that higher densities can be supported in Intensification Areas. Intensification Area and this should be acknowledged within the Estates Local Plan. Further, it could also be recognised that London Plan measures only and be subject to feasibility.

wording contained within the High Path ‘Issues and Opportunities: Good quality landscaping and vegetation’ section (Page 102) which retained; however retention should be based on a robust arboriculture and urban design analysis. This addition would reflect the wording contained within the High Path ‘Issues and Opportunities: Good quality landscaping and vegetation’ section (Page 102) which incorporates the statement ‘unless there are other compelling reasons that provide benefits to outweigh this’. It also noted that Policy EP EF7 requires the widening and enhancement of the entrance to Ravensbury Park. This Policy should suggest the investigation of such measures only and be subject to feasibility.

Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London PlanPolicy 7.24 Blue Ribbon network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.

6. Environmental Protection EQ HE RG

143000SAV

Savills / Clarion / Latimer

Three

In accordance with national policy there is no requirement for the Exception Test to be undertaken for Easelds and High Path. Reference to this should be removed from the justification sections for Policies EP E6 and EP HE.

Environment

No change proposed. The NPPF acknowledges that some areas will (also) be at risk of flooding from sources other than flood. All sources must be considered when planning for new development including: flooding from land or surface water run off, groundwater, sewers, and artificial sources. The two parts to the Test require proposed development to show that it will (also) provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. We would refer applicants to the advice and flow chart within section 8 of our Level 1 SRA.

6. Environmental Protection EQ HE RG

208000NE

High Path Community Association

Three

Out Planning,

Many thanks for consulting Natural England regarding the Estates Local Plan pre-submission version. Apologies for the delay in providing our response.

Environment

Noted with thanks.

6. Environmental Protection EQ HE RG

143000SAV

Savills / Clarion / Latimer

Three

The concerns raised regarding the balance of arboracultural and specific building design will not conflict with having buildings fronting Pincott Road as set out in HP1

Noted.

7. Landscape

Environment

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

Environment

The concerns raised regarding the balance of arboracultural and specific building design will be undertaken as part of assessing any planning application, and any loss may be mitigated as also set out in London Plan policy 7.21b Planning decisions.

Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London PlanPolicy 7.24 Blue Ribbon network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.

6. Environmental Protection EQ HE RG

152000SAV

Savills / Clarion / Latimer

Three

Landscaping – Policies EP H7, EP E7 and EP R7 each request that some existing trees on site should be retained. As previously mentioned some of these requirements are in direct conflict with other policies contained within the draft ELP. Furthermore, their restrictive nature limits the design options that the Council supports. The policy should therefore note that “where possible” existing trees will be retained; however retention should be based on a robust arboriculture and urban design analysis. This addition would reflect the wording contained within the High Path ‘Issues and Opportunities: Good quality landscaping and vegetation’ section (Page 102) which incorporates the statement ‘unless there are other compelling reasons that provide benefits to outweigh this’. It also noted that Policy EP EF7 requires the widening and enhancement of the entrance to Ravensbury Park. This Policy should suggest the investigation of such measures only and be subject to feasibility.

Noted.

7. Landscape

Environment

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

H6 R6

Protection E6

6.

Environment

The concerns raised regarding the balance of arboracultural and specific building design will be undertaken as part of assessing any planning application, and any loss may be mitigated as also set out in London Plan policy 7.21b Planning decisions.

157000SAV

Savills / Clarion / Latimer

Three

Intensification Areas

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

General

9. Site analysis

No change proposed. Although the London Plan South Wimbledon / Colliers Wood Area for Intensification is a relevant planning steer, we believe that other ways of explaining the benefits of the estate’s location - such as its excellent access to public transport – are more effective and easier for non-planners to understand in explaining why High Path represents an appropriate location for intensified development. Merton is currently working with the neighbouring boroughs of Kingston, Sutton and Richmond on the establishment of a South London Opportunity Area. It is considered that the collective physical and strategic links of these boroughs provide an appropriate approach to identifying and establishing a future growth strategy for the borough. The area for Intensification has been part of the London Plan since 2006 and its targets have already been met.
<table>
<thead>
<tr>
<th>Reference</th>
<th>Consultant / Respondent</th>
<th>Estate</th>
<th>Comment</th>
<th>Policy Area</th>
<th>Policy</th>
<th>Officer Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>0205009NP</td>
<td>Met Police</td>
<td>Three</td>
<td>Thank you for inviting me to comment on the Estates Local Plan update, due to internal technical difficulties I am unable to open any externally held documents that are greater than 5mb. It is possible for you to kindly email the three estate documents in separate emails as I can receive up to 15mb. Sorry for any inconvenience.</td>
<td>General</td>
<td>N/A</td>
<td>Noted.</td>
</tr>
<tr>
<td>0205002UR</td>
<td>Buckman I</td>
<td>Three</td>
<td>Thank you for your letter of 10th January regarding the Merton’s ‘Pre-submission Estates Local Plan’. I have no particular comments or views to make.</td>
<td>General</td>
<td>N/A</td>
<td>Noted.</td>
</tr>
<tr>
<td>0205002UR</td>
<td>Buckman I</td>
<td>Three</td>
<td>However, I would be grateful if you could keep me informed about the submission to the Secretary of State, the publication of the independent planning inspector’s report and when Merton Estates Local Plan is adopted.</td>
<td>General</td>
<td>N/A</td>
<td>Noted.</td>
</tr>
<tr>
<td>0205006HP</td>
<td>Batancourt E</td>
<td>Three</td>
<td>Good afternoon. I would like to be informed about the submission to the Secretary of State.</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>0705002UR</td>
<td>Acquah F</td>
<td>Three</td>
<td>In regards to the Pre-Submission Estates Local Plan, I have had a look through and I’m fairly pleased with it.</td>
<td>General</td>
<td>N/A</td>
<td>Noted.</td>
</tr>
<tr>
<td>0705021NP</td>
<td>Baskaran S</td>
<td>Three</td>
<td>My name is S Baskaran I would like to inform you that we are happy with the estate plan.</td>
<td>General</td>
<td>N/A</td>
<td>Noted with thanks.</td>
</tr>
<tr>
<td>0705020SA</td>
<td>Sport England</td>
<td>Three</td>
<td>Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England’s website at <a href="http://www.sportengland.org/_facilities_planning/planning-for-sport/forward-planning/">http://www.sportengland.org/_facilities_planning/planning-for-sport/forward-planning/</a>. In addition Sport England has a web-based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England’s website at: <a href="http://www.sportengland.org/_facilities_planning/planning-for-sport/precious-guidance/">http://www.sportengland.org/_facilities_planning/planning-for-sport/precious-guidance/</a>. The toolkit focuses on tools for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs. Information regarding planning obligations for sport can be found on Sport England’s website at: <a href="http://www.sportengland.org/_facilities_planning/planning_tools_and_guidance/planning_contributions.aspx">http://www.sportengland.org/_facilities_planning/planning_tools_and_guidance/planning_contributions.aspx</a></td>
<td>Environment</td>
<td>N/A</td>
<td>Noted with thanks. From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Planning Policy which will inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport England on the scope of the new strategy to ensure it meets their requirements.</td>
</tr>
<tr>
<td>130508SA</td>
<td>Savills / Clarion</td>
<td>Three</td>
<td>We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.</td>
<td>General</td>
<td>N/A</td>
<td>Noted with thanks.</td>
</tr>
<tr>
<td>130508SA</td>
<td>Savills / Clarion</td>
<td>Three</td>
<td>Submission Draft Estates Local Plan Consultation Representations made on behalf of Latimer Developments Limited Further to the issue of the “Submission Draft Estates Local Plan – Stage 2 Consultation” (December 2016 – February 2017) we write to make formal representations to the consultation on behalf of Latimer Developments Limited (Latimer). Circle Housing Merton Priory and Latimer Developments Limited The Submission Draft Estates Local Plan (SDL) refers to Circle Housing Merton Priory (CHMP) as the body to which the three estates were transferred to. Merton-Priory House whose trades are Circle Housing Merton Priory. In addition we would also like to add the following sentence to the end of the paragraph 2.21: “Recommended for additional clarity to add following sentence to the end of paragraph 2.21: “Latimer welcomes the Council’s support for regeneration and intensification of the estates as set out in the Draft Local Plan and for the broad changes and alterations made since the Stage 2 Consultation. Latimer and Savills as their planning agent also request to participate in the examination hearings on Merton’s ELP and to be notified when the document is updated” Comprehensive Regeneration Latimer has undertaken an extensive feasibility and discounting exercise in selecting these three Estates for regeneration. Latimer has considered a number of alternative options, such as meeting Decent Homes Standards only, and, as set out in the Case for Regeneration and after extensive assessment recognises that the full regeneration of High Path and Eastfields and the partial regeneration of Ravensbury presents the greatest opportunity to realise significant physical, social, economic and environmental benefits for not only the Estates but the wider Borough. Latimer is therefore supportive of the Council for bringing forward the DPD to aid the comprehensive regeneration of each of the Estates. The DPD at paragraph 2.21 refers to “comprehensive regeneration”. Whilst Latimer is committed to the delivery of all three schemes, in circumstances where affordable, sustainable, mixed tenure, affordable homes are not possible the full regeneration of the Estates is currently linked to viability. Latimer Group have decided that regeneration is the most cost effective way of delivering longer-term sustainable Decent Homes through the provision of new designed energy efficient homes that will meet the needs of residents now and in the future. The regeneration of Eastfields and Ravensbury is also financially dependent on High Path regeneration coming forward. The council has resolved, most recently in November 2016, to consider and support the Estates Local Plan on the basis of all three estates coming forward. This is stated as a key driven subject in the Key Drivers section, see heading “Delivering regeneration across all three estates” recommended for additional clarity to add following sentence to the end of the paragraph 2.21 (Modification 3): “Merton Council’s resolutions in July 2014 to explore regeneration via the creation of an Estates Local Plan and in November 2016 to submit the Estates Local Plan to the Secretary of State have been made on the basis of the three estates being listed as part of a single regeneration programme.”</td>
<td>General</td>
<td>N/A</td>
<td>Noted.</td>
</tr>
</tbody>
</table>

**Merton Council’s resolutions in July 2014 to explore regeneration via the creation of an Estates Local Plan and in November 2016 to submit the Estates Local Plan to the Secretary of State have been made on the basis of the three estates being listed as part of a single regeneration programme.**
<table>
<thead>
<tr>
<th>Reference</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>13005SAV</td>
<td>Savills / Clarion / Latimer Three</td>
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No comment required.
The Estates Local Plan covers a significant regeneration and investment period of 15 years. It sets out a strategically pitched framework to guide regeneration over the 15 years, with the level of prescription, such as the quantum of housing to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole development plan. The Estates Plan housing market assessment (examination library reference 1012) accompanying the Plan sets out potential ranges of the number of homes that could be provided within each estate.

Minor modification 10 EP.F4 page 112 The land use for the estate will remain predominantly residential with open space provision and with re-provision of the existing number of affordable homes, non-residential uses and designated open space to meet relevant planning policies.

Minor modification 27 Insert the following into Policy EP.F4 para 110 The land use for the estate will remain predominantly residential with open space provision and with re-provision of the existing number of affordable homes, non-residential uses and designated open space to meet relevant planning policies.

Minor modification 11 EP.F4 (a) page 68 Exceeding the current limited London Plan density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.

Minor modification 16 High path policy HP.H4 para 112 Amend as shown Exceeding the current limited London Plan density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.

Minor modification 28 Ravenclay policy HP.H4 para 112 Amend as shown Exceeding the current limited London Plan density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.


Paragraph 2.26a (new 2.27) The Estates Local Plan covers a significant regeneration and investment period of 15 years. It sets out a strategically pitched framework to guide regeneration over the 15 years, with the level of prescription, such as the quantum of housing to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole development plan. The Estates Plan housing market assessment (examination library reference 1012) accompanying the Plan sets out potential ranges of the number of homes that could be provided within each estate.

Minor modification 04 and 05 Noted with thanks. All development proposals will need to adhere to relevant Development Plan requirements including those concerning room sizes e.g. as set out in the Mayor’s London Plan (Table 3.1 Minimum space standards for new dwellings) and also the Mayor’s Housing SPD.

Minor modification 17 Existing accommodation and the existing


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Minor modification 17 Existing accommodation and the existing
## The London Plan describes suburban sites as 'areas with predominantly lower density development such as, for example, detached and semi-detached housing, predominantly residential, small building footprints and typically buildings of two to three storeys'. Whereas an urban area is classified as 'areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District Centre, or along main arterial routes'. Taking these definitions into account, alongside the size of the sites we do not regard it appropriate to describe the estates as suburban.

## Design Requirements – This section makes reference to providing communal bin stores for refuse storage. This could be amended to allow other solutions to be considered, for example Underground Refuse Systems, which will be subject to agreement with the Council’s waste team.

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

## Reference
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<th>Reference</th>
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<th>Estate</th>
<th>Comment</th>
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The submitted planning application will be determined in accordance with the London Plan Density Matrix using the TfL Webcat tool. The council's standard validation checklist will also apply and will take account of smaller schemes, should these be submitted.
Residents' involvement in the management of estates
The ongoing management of the estate is vital to its sustainability. Residents should have the opportunity to participate in the ongoing management of the regenerated estate. In some