

10 February 2023

Dear Mr Tesfai

22/P3688 – High Path Estate: Approval of reserved matters for High Path phases 3B & 3C

This application deals with the reserved matters from the outline permission 17/P1740, which was for “up to 1570 residential units” (from the current c608) and with 10 storeys as a maximum height. It covers mainly the north-western portion of the total development, beside the Listed station. A concurrent but separate outline application covers the rest of the development (22/P3686), which will be the subject of a separate letter.

The Society commented on 17/P1740 on 8 December 2017, raising concerns about excessive bulk, height & density and overshadowing. The reserved matters (i.e. which were not therefore approved) included **layout, scale, appearance, access and landscape**. Additional requirements included an Energy Strategy (condition 8), Daylight and Sunlight assessment (14), and an Archaeology assessment (49). The D&A Statement which says that “heights and layouts of buildings have been approved as part of the outline application” (page 14) should not be accepted: these matters were specifically reserved, as noted above.

In the view of the Society, significant design and planning issues remain unresolved, as follows:

1. There are numerous **single aspect flats**, contrary to Local Plan Policy CC8.16c, (and as such they cannot be naturally cross-ventilated). For example, Block A has c20: B c34: C c48: D c45: E c18, totalling around **c165**. The Society raised this major problem in its comments on the outline application.
2. The proposed **density is well in excess** of the earlier London Plan density range, resulting in very poor outlook and daylight to many of the flats at lower levels, as well as excessive bulk.
3. Local Plan policy follows the BRE publication daylighting criteria, requiring an uninterrupted outward view from windows of 25 degrees above any buildings opposite. However, the view outwards from flats facing the internal courts (between blocks B and C, and between C and D) is of a building 10 storeys high, and only c19m away. This angle is not 25, but close to 60 degrees, and is considered to be a **major infringement of daylight standards**, particularly as some of the flats involved are single aspect.
4. The **excessive height** of the buildings fails to match the scale of the buildings nearby, contrary to Local Plan Policy D12.2E “**appropriate scale**”, & D12.3A “responding to **site context**”. The Morden Road elevation seems to be 3 floors higher (at ground plus 10 storeys) than the existing high building opposite. This big building, with its projecting residential balconies, is sited so close to the road frontage that it creates a high canyon effect. Being 11 storeys high, one questions whether it conforms to the outline approval limit of 10 storeys.
5. **Narrow internal communal corridors** lead to the front doors of flats and are unable to be naturally lit and ventilated.

6. Whilst the Society is not able to offer technical views on **fire safety**, the reliance on a single staircase for buildings with such a very high occupancy seems to be highly problematic. As stated in the Fire Statement (5.1) **“Occupants should be able to turn their back on a fire, and escape via the nearest exit”**. It is difficult to see how this could be achieved in, for example, the end flats of block D, were the fire to emerge from the adjoining flats, and render the corridor impassable. The same applies to blocks A, B, C and even E, despite it having two staircases.

Conclusion: this is a development that appears to be mainly driven by the achievement of numbers, resulting in over-development. As it does not comply with important plan policies and standards, it should not be accepted.

Yours sincerely

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

Please send all correspondence by email to chairmanpc@wimbledonsociety.org.uk