



# THE JOHN INNES SOCIETY

For Conservation in the John Innes Estate at Merton  
Registered Charity No. 803759

Strategic Policy and Research  
Future Merton,  
London Borough of Merton.  
12<sup>th</sup> Floor,  
Civic Centre,  
London Road, Morden,  
SM4 5DX.

Please reply to 16 Melrose Road  
Merton Park  
London SW19 3HG

Tel: 020 8540 1402

E-mail: [mail@johninnesociety.org.uk](mailto:mail@johninnesociety.org.uk)

Date: 21<sup>st</sup> March 2012.

*Received 21.03.2012*

Dear Sirs,

re: Response to Consultation on Draft Detailed Planning Policies and Sites Proposed for New Uses.

The John Innes Society wishes to make the following representations:

## Part 1. Draft Detailed Planning Policies January 2012.

### DM R2 Out of Centre Commercial Development.

Policy 1.18. **We support** keeping a walking distance of 5 minutes (400 metres) to local convenience facilities, rather than the alternative Option of 800 metres.

**We do not support** Policy 1.18.c) iii) to would allow petrol stations to increase their retail space from 100 sqm to 280sqm. Our local experience with the BP Petrol Station at Wimbledon Chase is that since it included a Marks and Spencer food store, shoppers leave their cars at the pumps while they select their shopping, causing long queues for petrol. No petrol station should be allowed to include a food store of any size unless it can provide a dedicated parking area for shoppers which must be managed by the petrol station to prevent queues building up for the pumps.

### DM2 C2 - Education:

We think Policy c) does not cover the overall situation within the Borough. It is not just large developments which have added to the need for more school places. It is also the steady increase of new housing over a large number of sites (especially mixed use development) which has been encouraged and is now proposed for 41 out of the 63 New Uses sites (and all the group sites). The policy needs to be re-written so that Planning Permission for new residential development (large or small) can be refused if it can be shown that new housing in that location would place a pressure for school places in the area which cannot reasonably be met within the timescale of completion of the development for occupation. Assumptions that smaller units will not have children as occupiers **should not be made**. Pressure for housing means that many people have to remain in their small residential units after they have families even if they did not have children when they first moved in. An example is The Holt and The Homefield blocks of flats on London Road at Morden. Most of the flats are very small and there are no outdoor play areas, but the majority of occupants are now families, often of three generations.

### DM 02 Trees Hedges and Landscape Features.

We support this policy and look forward to it making it easier to protect Merton Park's heritage holly hedges.

In receipt of Grant Funding from

**THAMES**  
COMMUNITY  
FOUNDATION

*making a difference*

grassroots  
grants

Managed by the Community Development Foundation  
Funded by the Office of the Third Sector

## DM D3 Managing Heritage Assets

The wording of this policy is weaker than UDP Policy BE2 which it seeks to replace, and **we do not support** the qualification of the policy "where substantial public benefits outweigh the harm or loss" and "the harm or loss is outweighed by the benefit of bringing the site back into use". We consider that to be an invitation to landowners to allow their properties to deteriorate so that they can plead a development should be allowed even though it does not meet the criteria which would have applied had UDP Policy BE2 still been in force, because it is "for the greater good".

We are particularly concerned that there is no definition of "public benefit". Turning to the sites proposed for new uses, 30 out of the 63 on the list, and many within the grouped sites, are in public or utility company ownership. (e.g. London Borough of Merton, The Post Office, Thames Water). Public benefit could mean financial gain for the public purse which would be a licence to asset strip. If policies which would protect heritage assets can be ignored in this way, then for financial reasons, good buildings and heritage assets could well find themselves preserved but embedded within much larger mixed use developments (e.g. Wimbledon Library) causing them to lose their sense of place - Croydon style.

**We cannot say too strongly that we do not give our agreement, tacit or otherwise, to any plan or policy which would allow asset stripping.**

## DM T1 Transport.

We would like to see an additional policy to ensure that no residential area is more than 400 metres from public transport availability. This policy has worked well for Merton Park in the past, and resulted in the K5 hail and ride bus service, providing a bus for residents who would otherwise live a long way from the main road bus routes.

## Part II - Potential Sites for New Uses.

We have taken a holistic approach to the consideration of these 60 individual sites and 3 grouped sites, as the plans should be in the interests of the Borough as a whole - not just individual landowners.

Our observations are as follows:

a) of the 63 site proposals, 41 - plus all three grouped sites - propose residential development either on its own or in conjunction with other mixed uses. Residential development requires greater educational capacity but only 6 of the sites mention a possible educational use (and one of those is for adult education). Most of the sites which do mention a possible educational use combine it with other uses e.g. Wilson Hospital (No 20) and Birches Close (No 21) which is a half hearted approach to meeting the pressing need for new schools with a good standard of facilities such as outdoor playgrounds. Even a former school, The Chaucer Centre at Canterbury Road (No 36) does not offer an educational option other than "training".

b) of the 63 site proposals - 8 are major Car Parks serving important local amenities such as High Street Shopping and Wimbledon Theatre. Even if parking is provided in a new mixed use development experience shows it is likely to be more difficult to access (e.g. multi storey with smaller spaces) and more expensive. That will harm the viability and vitality of the facilities our well used Car Parks now serve. There should not be an assumption that people can be forced to use public transport by removing car parking. Experience shows it is more likely they will go else where for their shopping or entertainment, where there is acceptable parking.

Another factor is that open surface level car parks provide a welcome "open to the sky" ambience in what would otherwise be an overbearingly dense built up environment (e.g. Hartfield Road Car Park (Site No 1) which allows views across to the dome of Wimbledon Theatre.

c) Many other sites e.g. Wimbledon Delivery Mail Sorting Centre (No 49) provide an essential local service and employment which would not be met by the Council's preferred use of mixed use office and residential.

In receipt of Grant Funding from

 **THAMES**  
COMMUNITY  
FOUNDATION

*making a difference*

**grassroots**  
grants

Managed by the Community Development Foundation  
Funded by the Office of the Third Sector



Where a change of use is proposed "subject to relocation of the current facilities" the proposal should identify where those alternative facilities will be and show they will provide at least as good quality and access as the one to be lost. They should also show the alternative site is available for the proposed use **before** the first site is closed so we do not have a repeat of the situation with the Centre Court Shopping development in Wimbledon, where the Council said a replacement Civic Hall would be provided, but it has never happened.

d) We support the Council's preferred use as Open Land and nature conservation for Site 38 (Thames Water site at Bygrove Road, Colliers Wood). It is believed to be the access point for the London Deep Water Ring Main built through Merton in the 1980's. It is almost certainly not suitable for a large residential development as proposed by the owners, Thames Water. The other Merton access point, at Raynes Park, appears to have been built over recently with the new Waitrose Store and flats.

e) We would like an assurance that when sites are under consideration, factors such as the location of the Water Ring Main are taken into account. Otherwise developers might drill ground source heat pumps and puncture the ring main.

Yours sincerely,

