

From:**Sent on:** Monday, February 1, 2021 11:26:27 AM**To:** Future Merton <Future.Merton@merton.gov.uk>**Subject:** DRAFT LOCAL PLAN 2A: CONSULTATION RESPONSE**Urgent:** High

I am writing to respond to the consultation on the draft Local Plan. I have lived in the borough since 1970, and have a good knowledge of the borough generally. I am a long-standing member of the Labour party nationally and of the Wimbledon Labour Party. I am also a member of Trinity United Reformed Church in Wimbledon, and am active in Merton Citizens, of which Trinity URC is a member institution. One of Merton Citizens' priorities is housing and homelessness in the borough. I am however writing this email in my personal capacity.

I am limiting this response to the issue of housing and hope to respond separately on the contents of the Draft Plan relating specifically to Wimbledon.

HOUSING

Generally

It is vitally important that the Housing policies in the Plan recognise that residential use, whether as a primary or mixed-use development, is core to the economy, security and vibrancy of the various town centres in the borough.

Policy H4.1

1. Under sub-para e., the specified target for provision of affordable new homes across the borough should be a **requirement** rather than an aim, so that the council is clearly committed to meeting the target, and so that all development proposals are subject to the requirement.
2. Under the proposed affordable housing split for 10+ units, of the requirement for 70% to be at low-cost rent, 60% should be at social rents. The remainder of the provision should be made up of homes let at London Living Rents (as defined in the Mayor of London's current London Plan) and of affordable owner-occupied homes sold at prices linked to local incomes. Such a policy would address the way in which, in recent years, so many people living in the borough have been priced out of both renting and buying homes in the Borough.

3. The Housing policy should also specifically designate community land trusts as a recognised and accepted form of affordable housing in the borough. That would encourage local groups and housing providers to bring forward community land trust schemes.
4. Paragraph 4.1.11 refers to the apparent lack of interest of housing providers in managing low rent housing. That is a clear illustration of the need for the Council to raise its sights, and to take advantage of the funds that are available to the Council to carry out social rent housing developments itself once more, as happened before the bulk transfer of local authority housing by the previous Conservative administration.

It would be good if Merton could be ambitious for a change, and take as its example the Goldsmith Street development in Norwich, which won the RIBA Stirling award in 2019. That was built directly by Norwich City Council, and consists of homes let on secure tenancies at social rents.

5. Paragraphs 4.1.10 and 4.1.20 refer to the challenge of developments carried out under Prior Approval procedure (conversion of office use, etc, buildings to residential use without the need for planning permission). It is notorious that the Prior Approval procedure has led to the creation of substandard housing, often on substandard sites. Connect House in Mitcham is a good (or rather, bad) example of this. The Housing Policy should provide for the council to liaise with the Mayor of London and other councils to press for the revocation of the Prior Approval procedure.
6. This policy should require affordable homes provision to have a suitable mix of sizes of homes, so that families can be appropriately housed, and so as to reduce overcrowding. The latter has clearly been a factor in the spread of infection during the Covid-19 pandemic. See also my comments on Policy H4.3 below.

Policy H4.3

1. This policy refers to the need for larger family homes. I understand that one of the reasons for the length of Merton's housing waiting list is that most of the housing units over which Merton has nomination rights, and which become available, are 1-bedroom homes. The overall housing policy (and in particular this policy and Policy H4.1) should specifically **require** affordable homes provision to have a suitable mix of 2-, 3- and 4-bedroom homes, and this should not just be a preference, or a matter for 'favourable consideration'.

2. This policy makes no reference to the problem of overcrowding, and specific reference needs to be made the need to address and eliminate overcrowding.

One of the reasons for the housing clearance and redevelopment policies adopted for many years until the 1970s was to eliminate substandard and overcrowded housing, for good reasons connected with public health and social risk. Overcrowding has clearly been a factor in the spread of infection during the Covid-19 pandemic. Further, substandard housing, particularly in the lower end of the private residential rented sector, is still with us.

Yours sincerely