

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

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Our ref: LDF24/LDD08/CG01
Date: 08 January 2018

By email: future.merton@merton.gov.uk

Dear Ms Butler

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Merton – Local Plan 2020– Stage 1 consultation

Thank you for consulting the Mayor of London on the Merton Local Plan 2020 (Stage 1 consultation). As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. These representations include comments from Transport for London (TfL), which I support and are included in this letter. More detailed comments from TfL have been sent separately and are also attached as Annex 1.

The London Plan

The Mayor published his draft new London Plan for consultation on 1st December 2017. It is anticipated the Examination in Public of the London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Merton is in an excellent position to take account of the policies in the draft new London Plan. In this regard, it is not necessary to repeat all the policies within the draft new London Plan, as once published the new London Plan will form part of Merton's Development Plan, and will contain the most up-to-date policies – although Merton may wish to tailor some policies to suit its local circumstances, based on local evidence.

Merton's Local Plan 2020 is required to be in general conformity with the current London Plan, however it is expected to be aligned with the draft new London Plan as its policies gain more weight as it moves towards publication in 2019. In addition, the draft new London Plan will now be a material consideration in planning decisions.

Housing target

The draft new London Plan sets out how London's housing need can be met within its boundaries. This will require all those involved in housing delivery to work together. The draft new London Plan sets Merton a 10-year net housing completions target of 13,280 units (1,328 per annum) which is significantly higher than its existing target of 411 per annum. Of this revised target, 6,710 completions should be from small sites.

Housing need

Table 4.3 in the draft new London Plan sets out the 2017 London SHMA findings:

Tenure	1bed	2bed	3bed	4+bed	Total	% of total
Market	10,682	2,043	4,101	6,210	23,037	35%
Intermediate	4,334	3,434	2,409	1,693	11,869	18%
Low-cost rent	21,318	5,311	2,462	1,881	30,972	47%
Total	36,335	10,788	8,971	9,783	65,878	100%
% of total	55%	16%	14%	15%	100%	

This shows a significant need for low-cost rental housing and 1-bedroomed flats, which should be reflected in local plans. Emerging Policy H7 Affordable housing tenure requires boroughs to split affordable products as follows:

- Minimum 30% low-cost rented homes
- Minimum 30% intermediate products (including London Living Rent and London Shared Ownership)
- 40% to be determined by identified local need (consistent with definition of affordable housing).

Housing delivery

Housing delivery in Merton has been steady over the last six years averaging 455 homes a year, peaking at 510 homes and 508 homes in 2011/12 and 2015/16, respectively (Net housing completions - DCLG).

To sustain and increase delivery, Merton's Local Plan 2020 should set out a clear strategy, allocating sufficient land and including proactive policies, taking into account the measures set out in draft new London Plan policies H1- Increasing housing supply and H2 – Small sites. In this regard Merton has been working with my officers on the London SHLAA and to deliver the three housing estates - Eastfields, Ravensbury, and High Path. Merton has a housing zone at Morden Town Centre which has the potential to deliver 1,070 homes, including 428 affordable homes and 2,140 jobs.

To deliver the small sites target, Policy H2 Small sites states that boroughs should apply a presumption in favour of small housing developments from infill development on vacant or underused sites and for sites within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary promote residential conversions and extensions, including upward extensions, redevelopment and infill. The Mayor recommends Merton's Local Plan 2020 includes a positive approach to small sites to meet the requirement in emerging Policy H2 for boroughs to prepare area-wide design codes to promote good design and higher densities on small sites.

In order to optimise the type of housing delivered, draft new London Plan Policy H12 Housing size mix states that boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered, which are regarded as inflexible and are often not implemented effectively and generally do not reflect the optimum mix for a site. It is noted that Merton expects its number of households to increase by 15% (2011-2021) and its average household size to decrease. This is in line with the findings of the London SHMA 2017 which shows the number of family households (i.e. not single people or Other)

without dependent children is projected to grow more (by 45%) than those with dependent children (by 18%). Overall housing policies in Merton need to consider strategic London need as well as local need and the potential of new homes to be affordable to the intended occupants.

Housing estate regeneration

Merton has published a draft Local Plan to support the redevelopment of three of its housing estates, mentioned above. The Mayor supported the draft Plan, subject to them setting out how land will be used efficiently. It is important that estate regeneration does not lead to the loss of affordable housing and that it delivers an uplift in affordable housing where possible, with delivery of affordable housing being maximised. Draft new London Plan policy H10 Redevelopment of existing housing and estate regeneration requires existing affordable floorspace to be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost. Estate regeneration should follow the Mayor's Good Practice Guide to Estate Regeneration.

Affordable housing

Genuinely affordable housing is a priority for the Mayor and he strongly encourages Merton to adopt the affordable housing policies as set out in the draft new London Plan Policy - H5 Delivering affordable housing, Policy H6 Threshold approach to applications and Policy H7 Affordable housing tenure. Draft paragraph 4.6.3 notes that the percentage of affordable housing should be calculated by habitable rooms. The Mayor would have no objections to a policy seeking contributions from schemes of fewer than 10 dwellings. Feedback from other London Borough Examinations is that Merton will need robust viability evidence to support such a policy. The need for affordable housing is clearly demonstrated in the London SHMA 2017.

The draft new London Plan Policy H17 Purpose-built student accommodation seeks at least 35% of purpose-built student accommodation to be secured as affordable. The rental cost for affordable student accommodation has been defined through the work of the Mayor's Academic Forum.

Similarly, the Mayor will expect specialist older persons housing (sheltered accommodation and extra care accommodation), which falls within Use Class C3, to provide affordable housing in line with affordable housing policies (H5 Delivering affordable housing and H6 Threshold approach to applications). However, the tenure split requirements for specialist older person accommodation may differ from those set out in Policy H7 Affordable housing tenure. Where this is proposed, it should be set out in Development Plan Documents or supplementary guidance.

Further detailed guidance on delivering affordable housing can be found in the Mayor's Affordable Housing and Viability SPG.

Specialist older persons housing

The draft new London Plan contains a new, dedicated specialist older person policy (H15). Older persons housing, including sheltered accommodation and extra care accommodation that falls within Use Class C3 is subject to the affordable, accessible and inclusive design housing policies.

Annual borough benchmarks for specialist older persons (C3) is provided in Table 4.4 of the draft London Plan. Merton's benchmark in the draft Plan is 105 units per annum, a slight decrease on the current benchmark of 110 units per annum.

Student housing

Student accommodation forms part of the overall housing need for London and purpose-built student accommodation (PBSA) therefore contributes to meeting London's housing need. Strategic need for PBSA is not broken down into borough-level targets, however boroughs should ensure that local and strategic need for PBSA is addressed.

Build to rent

Draft London Plan policy H13 Built to Rent sets out the Mayor's proposed approach to build to rent, including the need for these schemes to provide 35 per cent affordable housing to be able to follow the fast track route instead of the Viability Tested Route.

Minimum space standards

The Mayor would raise concerns if Merton chose not to adopt the minimum space standards for new dwellings as set out in Table 3.1 of the draft new London Plan. As stated above, fewer bedroom homes are required to meet London's need, as supported by Merton's evidence that household sizes are decreasing.

Town centres

As identified in Merton's consultation document, Wimbledon is designated as a major town centre in the existing and emerging London Plans. It is also an Opportunity Area. In the emerging London Plan Wimbledon is classified as an area of regional or sub-regional significance for its night-time economy. It is also identified as high potential for residential growth and commercial growth, including the potential for speculative office development. Merton's emerging Local Plan, should also identify how housing will be supported in Wimbledon Town Centre to fulfil its role as an Opportunity Area.

Mitcham and Modern are both identified as District centres with a low potential for commercial growth, but a high potential for residential growth. Mitcham is identified as an area for strategic regeneration.

Colliers Wood is currently unclassified in the London Plan, but is identified as having a future potential network classification as a District Centre. As set out in draft paragraph 2.7.4, for the area to be reclassified, a clear strategy needs to be developed and implemented that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure.

Draft London Plan policy SD6 Town centres seeks to promote strong, resilient, accessible, inclusive and viable hubs for a diverse range of activities. Appropriate land uses include new housing within and on the edges of town centres through higher-density mixed-use or residential development. The appropriate mix in Merton's town centres should be informed by local evidence. In this regard, Merton has recently in put into the London Town Centres health check.

The Mayor would welcome a local policy on supporting public houses in line with draft new London Plan policy HC7, supporting the night time economy (HC6) and Supporting London's Culture and creative industries (HC5).

Emerging draft new London Plan policies (GG3 Creating a health city and E9 Retail, markets and hot food takeaways) seek to manage betting shops and hot food takeaway. Again, experience from recent examinations is that Merton will need local evidence to support a hot-food take-aways policy.

Employment and Industry

Emerging Policies E1 to E11 in the draft new London Plan cover the economy, employment and industry. Draft policy E1 Offices notes that there will be growth in office space in outer London but it is anticipated to be focused in selected locations, such as Wimbledon. A new policy has been included to promote the availability of lower cost (market) workspace and in certain circumstances, affordable (subsidised) workspace.

A further change in approach of the draft new London Plan is promoting the intensification of industrial activities and where appropriate (in line with emerging policy E7), co-location with residential development. Due to the much greater release of industrial land than that stipulated in the London Plan monitoring benchmarks, the draft new London Plan takes a more restrictive approach to the loss of designated industrial areas. Merton is categorised as a borough that is required to retain its industrial capacity. The borough has three areas of Strategic Industrial Locations at Modern Road Factory Estate and Prince George's Road, Willow Lane, Beddington and Hallowfield Way and North Wimbledon/Garrett Business Park (Summerstown), which extends into Wandsworth.

Air quality

Draft new London Plan policy SI1 retains the air quality neutral approach from the adopted London Plan and introduces the concept of air quality positive.

Open space

The Mayor would welcome the protection of Metropolitan Open Land and green and open space across Merton.

Transport

In terms of TfL's operational interests TfL would suggest that land is allocated and/or safeguarded to enable transport improvements to take place in the future to support the growth of homes and jobs in the borough as well as address existing issues. The specific schemes for which we would seek an allocation currently are:

CR2

Part of the Merton is identified within the CR2 South Growth Corridor in the new London Plan. The new London Plan makes clear that planning frameworks for all areas affected by Crossrail 2 should respond positively to the significant development capacity unlocked by Crossrail 2 and in doing so should outline how the additional development capacity could be phased to reflect the transport connectivity and capacity improvements. In preparing future development frameworks, consideration should be given as to how all sites brought forward in the call for sites, those identified in the GLA SHLAA, and any additional sites can respond positively to the Crossrail 2 opportunity, using the Crossrail 2 scenario in the SHLAA as a starting point for assessment. TfL and the Crossrail 2 team are willing to work with LB Merton to explore how the CR2 SHLAA scenario can be tested in preparing future development frameworks.

Sutton Tram Extension

TfL is working closely with the London Boroughs of Merton and Sutton to develop the case for the Sutton Tram Extension. This extension is strongly supported by the Mayor and is identified as a key scheme in the draft Mayor's Transport Strategy. The Mayor has asked TfL to be prepared to submit a Transport & Works Act Order application to seek planning consent for the scheme within the current

Mayoral term (by May 2020) subject to the full funding package to deliver the scheme being identified. Merton officers are members of the Stakeholder Working Group and are expected to be members of the Strategic Steering Group, which will help guide the project, when it is instigated shortly.

There are two strategic options for the tram extension currently being considered. The first is an on-street option which would run from Morden Road tram stop to Sutton Town Centre via Morden Road, Morden Hall Road and St Helier Avenue in Merton. A considerable amount of design work on this option has been undertaken in the past. This would predominantly operate in highway but would require small areas or strips of non-highway land along its route through Merton, for example at the junction with the existing network.

A northern spur to either South Wimbledon or Colliers Wood is also planned as part of the Sutton Tram Extension scheme. This would provide a northern terminus for trams from Sutton but also for additional trams from Croydon.

An alternative option could see trams replacing trains on the Sutton Loop rail line between Wimbledon and Sutton, in which case trams would operate within the existing railway boundary only and no new land would be required.

A decision on the preferred strategic option is expected to be made by summer 2018.

It is important that land is safeguarded to deliver the Sutton Tram Extension to ensure its delivery is not hindered. Prior to a preferred strategic option being identified during 2018, all options currently identified should continue to be considered as potential options for delivery with appropriate land safeguarded for the route.

Merton officers already hold the relevant plans but TfL has provided again a set of plans for the on-street alignment and for the options for the northern spur to South Wimbledon or Colliers Wood. These indicate the potential alignment options for the scheme where TfL consider it would be inappropriate for development to be proposed that may hinder the delivery of the Sutton Tram Extension.

My officers at TfL would be happy to discuss the scheme further with you should it be necessary.

In addition to the Sutton Tram Extension, TfL also wish to flag the potential need to remodel the junction where the tramway crosses Kingston Road to reduce interaction between traffic and trams.

At this stage TfL are unable to specify exactly what this scheme is, as it could range of a new road layout through to a new tram bridge across the road. But any development within 100m along the tramway from this junction, and around 20m either side of the tramway, would need some consultation with Merton and TfL to determine a way of protect the ability to increase the capacity of the junction in future.

Wimbledon Bus Station

Wimbledon Bus Station located on Cyril Black Way has been occupied by TfL since 1991. It is important that this land is safeguarded as a transport interchange in order to maintain bus accessibility and reliability with the town centre.

Other

There may be other schemes that emerge over time and the land requirements for the above schemes will be confirmed through the design and consents process. TfL would therefore welcome continuing dialogue with Merton Council and landowners/developers on emerging proposals.

In addition TfL would wish to be involved where sites are being considered for redevelopment or allocation on which there is currently a transport use or where such a use is close by. TfL would expect transport infrastructure/services to be retained if not enhanced as part of these schemes although not necessarily always on the existing site and for developers to take account of the impacts of transport operations and infrastructure upon their schemes and occupiers.

Next stages

The Mayor will provide more detailed comments on the emerging Merton Local Plan 2020 at the next consultation stage and his opinion on general conformity with the London Plan at the Regulation 19 stage.

I hope that these comments can inform the development of Merton's Local Plan 2020. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the issues raised. I would welcome discussions on how Merton can accommodate good growth during the development of your Local Plan.

Yours sincerely,



Juliemma McLoughlin
Chief Planner - Greater London Authority

Cc Richard Tracey, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Annex 1

Our ref: 17/5080

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18th December 2017

Dear Tara,

Merton's new Local Plan, call for sites, and infrastructure need – TfL's comments

Thank you for consulting with TfL.

The following comments are made by TfL City Planning officers on a 'without prejudice' basis and are intended to ensure that this policy document is in line with relevant London Plan transport policies and reflects the draft Mayor's Transport Strategy. You should not interpret them as indicating any subsequent Mayoral decision and these comments do not necessarily represent the views of the GLA.

General

TfL Borough Planning's (TfL BP) supports Merton's proposals to produce a new Local Plan to reflect changes to national planning policy, the full review of the London Plan and changes in the borough. The Council's aspirations is to develop a Local Plan to guide how the borough develops and to successfully and responsibly manage growth along with sustained economic success, while ensuring the best interests of the borough, its residents and businesses.

At this stage in the process, the consultation is made up of thirteen surveys which aim to gather ideas that will help to shape the planning policies. The Travel and Movement and Call for Sites surveys are key for TfL, and it is essential that the existing and future public transport networks, accessibility, connectivity and sustainable travel are considered throughout the growth and development of the borough.

TfL supports Merton's priorities to create a better street environment in which to live, by prioritising people's health and quality of life, and promoting sustainable travel and encouraging walking, cycling and the use of public transport. This is in line with the draft Mayor's Transport Strategy which looks to put people's health and quality of life at the very heart of planning the city's transport with an aim that by 2041, 80 per cent of all Londoners' trips will be made on foot,

by cycle or by public transport. Increasing the safety and perception of sustainable travel and London's roads is also vital in meeting these priorities. Reducing traffic volumes, traffic dominance and controlling new car parking provision are also key priorities for TfL and will contribute to improved air quality and healthy streets.

Transport infrastructure is also highlighted as a key priority to support growth and additional demand. In deciding how future housing and employment needs will be met in the Borough, consideration should be given to the opportunities arising from planned transport investment within the Borough. In the draft new London Plan, parts of the Borough are located within the Crossrail 2 Growth Corridor and Wimbledon is identified as a new Opportunity area. The preparation of the Local Plan should consider how future changes in access, capacity and connectivity arising from transport investment could maximise development opportunities, both directly and indirectly as a result of improved services.

The Sutton Tram Extension is another major transport scheme that is supported by the draft Mayor's Transport Strategy and could enable substantial development along its route. This scheme would also support the growth of Merton and more details about the scheme and its impacts are set out later in our response.

It is important that the borough's growth aspirations incorporate Mayoral policy objectives and reflect Healthy Street principles in line with the draft Mayor's Transport Strategy 2017, and the draft new London Plan 2017 and policies are developed within Merton's Local Plan to reflect this.

Call for Sites

In terms of TfL's operational interests we would suggest that land is allocated and/or safeguarded to enable transport improvements to take place in the future to support the growth of homes and jobs in the borough as well as address existing issues. The specific schemes for which we would seek an allocation currently are:

CR2

It is important that through the preparation of the Local Plan, sufficient protection is provided for the delivery of Crossrail 2 through the Borough. This should include clarity on how the Local Plan will help protect the route and worksites required to construct the scheme. It will also be important to engage with the Crossrail 2 team to understand how sites required for the construction of Crossrail 2 can best be brought back into use and appropriately phased in order to maximise the overall benefit of the scheme.

Beyond the route itself, the new London Plan makes clear that planning frameworks for all areas affected by Crossrail 2 should respond positively to the significant development capacity unlocked by Crossrail 2 and in doing so should outline how the additional development capacity could be phased to reflect the transport connectivity and capacity improvements. In preparing future

development frameworks, consideration should be given as to how all sites brought forward in the call for sites, those identified in the GLA SHLAA, and any additional sites can respond positively to the Crossrail 2 opportunity, using the Crossrail 2 scenario in the SHLAA as a starting point for assessment. TfL and the Crossrail 2 team are willing to work with LB Merton to explore how the CR2 SHLAA scenario can be tested in preparing future development frameworks.

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Other

There may be other schemes that emerge over time and the land requirements for the above schemes will be confirmed through the design and consents process. We would therefore welcome continuing dialogue with Merton Council and landowners/developers on emerging proposals.

In addition we would wish to be involved where sites are being considered for redevelopment or allocation on which there is currently a transport use or where such a use is close by. We would expect transport infrastructure/services to be retained if not enhanced as part of these schemes although not necessarily always on the existing site and for developers to take account of the impacts of transport operations and infrastructure upon their schemes and occupiers.

Summary

It should be noted that TfL Commercial Development will respond separately to the consultation with their comments on TfL's commercial interests. The comments above reflect TfL BP position.

I trust that the above provides you with an understanding of TfL's current position on the policy document and proposals. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised and we look forward to working with the Council on the document going forwards.

Yours sincerely,

Lucy Simpson

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