

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

**Tara Butler**  
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Merton Council  
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SW4 5DX

**Our ref:** LDF24/LDD08/DR01  
**Date:** 04 January 2019

By email: [future.merton@merton.gov.uk](mailto: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 2 consultation**

Thank you for consulting the Mayor of London on the Merton Local Plan 2020 (Stage 2 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.

This letter sets out where you may need to amend proposed policies and supporting text to be more in line with the current London Plan and the emerging Draft New London Plan.

**The draft new London Plan**

The Mayor published his Draft London Plan for consultation on 1<sup>st</sup> December 2017 and the Minor Suggested Changes on 13 August 2018. The Examination in Public of the Draft London Plan will commence in January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Merton Development Plan and contain the most up-to-date policies.

The Merton Local Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the Draft New London Plan will become out of date as the Draft New London Plan gains more weight as it moves towards publication. It appears that Merton's draft Local Plan will undergo Examination after the Mayor receives the Panel report on the draft London Plan. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.

On 8 January 2018, the Mayor provided comments (reference: LDF24/LDD08/CG01) on Merton's stage 1 consultation on the Merton Local Plan, making suggestions as to how the Local Plan should progress in light of the emerging Draft New London Plan. This letter follows on from that earlier advice.

## **Housing Delivery**

It is disappointing that Merton has taken no account of the housing supply policies in the new London Plan, and instead has chosen to roll-forward the current target from the London Plan 2016. Planning Practice Guidance is clear that the Mayor as the strategic policy making authority is to distribute the total housing requirement for London. 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.

The Mayor's distribution is based on the London Strategic Housing Land Availability Assessment (SHLAA) which is an approach that has been found sound at all previous Examinations of the London Plan, plus a methodology for small sites. In this regard the SHLAA was carried out in 2017 and therefore captured many new sites that contribute to Merton's new housing target, along with small sites modelling. In rolling forward the current plan figure, it should be recognised that Merton would need to conduct a Local Plan review as soon as the new London Plan is published. An Inspector may request Merton updates its housing trajectory during the Examination process, especially if the Panel has published its report on the draft new London Plan.

## **Spatial Vision**

Paragraph 1.22 and Key Diagram

The Mayor supports the preparation of a Planning Framework for the Wimbledon/South Wimbledon/Colliers Wood/Morden Opportunity Area. The Local Plan could provide further detail to support this framework by defining the boundary of the OAPF, in line with new London Plan Policy SD1.

Paragraph 1.24. The housing target meets the current London Plan, but is significantly lower than the target in the new London Plan. This low number of new homes will not meet Merton's and London's need for new housing and in particular will limit the number of genuinely affordable homes that can be provided.

## **Policy HW2.2**

The Mayor supports Merton's proposals to manage and monitor hot food takeaways, supporting Policy E9 of the new London Plan

## **Policy N3.1**

As set out in the Mayor's response to the Stage 1 consultation, Colliers Wood is currently unclassified in the London Plan, but is identified as having a future potential network classification as a District Centre. The Mayor supports the strategy set out in the Local Plan to secure a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure. However, the council will need to provide evidence to support the statement at N3.1 a. that Colliers Wood will be treated as a District Centre.

The Mayor supports the reference to the new Opportunity Area, and the GLA and TfL will support Merton in preparing an Opportunity Area Planning Framework for the area. The recognition that the

area could support tall buildings is supported. To fully conform with new London Plan Policy D8 the plan should define what is considered a tall building for specific localities.

### **Site Mi1 Benedict Wharf**

This site is a waste management site and Strategic Industrial Location (SIL) and as such draft new London Plan policies E4, E5 and E7 apply. Merton should seek to intensify and enhance the industrial, storage and distribution functions of the site. The introduction of non-industrial uses would only be considered acceptable through a process of consolidation and intensification of industrial uses, leading to a release of some designated SIL. However, any proposed release of SIL would also need to take account of Merton being identified in the current London Plan as a 'restricted release' borough, and in the new London Plan as a 'retain capacity' borough. The text states that the council would support the removal of SIL capacity from this site to elsewhere in Merton, but there are no details of the location, size or quality of the replacement SIL.

### **N3.3**

The Mayor supports the delivery of the Morden Regeneration Zone. The recognition that the area could support tall buildings is supported. To fully conform with new Policy D8 the plan should define what is considered a tall building for specific localities.

### **Site Mo3**

This site is designated Metropolitan Open Land (MoL). The allocation of this site for residential development conflicts with Policy 7.17 of the current London Plan and Policy G3 of the new London Plan, and is not supported. The council will need to demonstrate exceptional circumstances to support any loss of MoL.

### **Site Mo4**

Whilst the Mayor supports the regeneration zone, housing zones are not formal planning designations and are not considered to be a strategic planning factor.

### **Policy N3.4**

This policy, particularly criterion k, should be amended to recognise the directional change in the strategic approach put forward in the Draft New London Plan Policy H2 for the presumption in favour of small housing development. It is through this new strategic approach that small housing development and small home builders will be able to contribute and play a far greater role in delivering much of London's housing need over the plan period. 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. The statement that tall buildings are not suitable within the centre appears unduly restrictive. The text refers to a tall buildings background paper prepared in 2010. Merton should commission a new and updated assessment of tall buildings, in accordance with new London Plan Policy D8.

### **Site RP2**

This site is a locally-designated industrial site and any proposals should comply with policies E4, E6 and E7 of the new London Plan. Intensification and co-location may be appropriate subject to no net loss of industrial floorspace.

#### **Policy H4.1**

Whilst the Mayor supports the provision of a range of housing types and sizes, plans should not set prescriptive size requirements. The requirement at criterion c could lead to development sites not being optimised. The council can set size requirements for affordable housing.

#### **Policy H4.2**

Merton's housing target for the period 2015-2025 is 411 new homes a year as set out in the current London Plan. However, Merton's new housing target (2019-2028) is set out in the draft new London Plan in Table 4.1 as 1,328 per year and will become Merton's housing target once it is published and should be reflected in Merton's Policy H4.2. As outlined above, whilst the housing target in Merton's draft Plan meets its current London Plan housing target, it does not meet that of the Draft New London Plan, therefore it is likely that by the time Merton's Local Plan reaches Examination additional housing capacity will need to be identified. In this regard, the Mayor believes that additional delivery in Merton will come from small sites in order for it to meet its new housing target.

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.

#### **Policy H4.3**

The Mayor supports part of this policy, which implements the approach taken in the Draft New London Plan at Policy H12 encouraging boroughs to provide guidance on the sizes of units required for both social and affordable rented homes to ensure affordable housing meets identified needs. However, H12 is clear that plans should not be prescriptive for the housing size mix of market and intermediate dwellings. This could lead to development not making optimum use of sites or homes not meeting identified needs. The borough-wide requirement should be removed.

#### **Policy H4.4**

This policy should refer to the benchmark from the new London Plan policy H15. For Merton this is 105 units per annum.

#### **Policy H4.6**

This policy will need to be updated to reflect the outcome of the Gypsy and Traveller needs assessment. The assessment should use the definition set out in the new London Plan policy H16.

#### **Policy H4.7**

This policy should be amended to reflect new London Plan policy H13, which allows built to rent developments to provide affordable housing as solely discounted market rent.

#### **Policy D5.1**

In accordance with new London Plan policy D8 the plan should set out locations for tall buildings and indicate appropriate building heights.

### **Policy D5.3**

Criterion xvi, the requirement for 50m<sup>2</sup> of private garden space per house/ground floor maisonette/duplex unit, should be amended to include some flexibility that allows the optimisation of housing delivery whilst ensuring good quality amenity space is provided. The ability of a scheme to provide private amenity space within housing development will differ between individual schemes and planning policies should take into account site layout, orientation and other design factors and constraints with an intention to provide private amenity space for each dwelling that is usable and results in a balance of openness and protection as set out in Table 3.2 of the Draft New London Plan.

### **Policy D5.9**

The policy to provide a replacement family dwelling does not conform with new London Plan policy that plans should not prescribe housing sizes, nor the presumption in favour of small sites. The policy could prevent the optimum use of a site.

### **Policy Ec7.2**

The definition of uses appropriate in SIL and LSIS should be amended to 'provide research and development of *industrial related products or processes* (B1b)' to match the definition in new London Plan policy E4. The Mayor has objected to the release of Benedicts Wharf from SIL. The proposed designation of Streatham Road as SIL, whilst supported, does not compensate for the proposed loss of SIL at Benedicts Wharf. Streatham Road is currently in industrial use and the loss of Benedicts Wharf would represent a net loss of industrial capacity and therefore conflict with new London Plan Policy E4.

### **Policy Tc7.6**

Whilst the Mayor recognises that Colliers Wood has future potential as a district centre, it is not currently designated as such. Therefore, the council will need to provide supporting evidence to justify Colliers Wood being listed as a town centre.

## **Transport**

### ***Wimbledon / Colliers Wood / South Wimbledon Opportunity Area***

Opportunity Areas are expected to aspire to more ambitious mode share targets and to meet or exceed indicative guidelines for new homes and jobs as set out in the draft London Plan to fully realise their growth potential. The Merton Local Plan 2020 and Future Wimbledon Masterplan should set out how growth will be phased in order to maximise the benefits of major infrastructure improvements such as Crossrail 2 and the Sutton Link.

### ***Crossrail 2***

Crossrail 2 is a proposed new railway that will bring about transformational change along its corridor and across Merton, unlocking significant growth potential and improving public transport connectivity and capacity. Crossrail 2 needs a more explicit introduction in the Merton Local Plan 2020, ideally in a new chapter on transport. The Merton Local Plan 2020 should be clear that the scheme has three proposed stations in the borough at Wimbledon, Raynes Park and Motspur Park.

We recognise the need for a long term vision for the development of Wimbledon town centre, and support the opportunity that the Future Wimbledon Masterplan offers for a more planned and coordinated approach to growth and investment. A key objective of Crossrail 2 is to integrate new

transport infrastructure into local areas and create high-quality places and support regeneration. We generally support the aim to improve the public realm in Wimbledon town centre. Consideration should be given to the phasing of public realm improvements near any future Crossrail 2 construction sites to minimise abortive investment.

Land around Wimbledon station has been identified and safeguarded in the Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015 (see Appendix D). Safeguarding is an established part of the planning system which protects the future possibility of a railway being built and ensures that anything built within the boundaries identified in the directions allows for the future construction of Crossrail 2. TfL will continue to work with Government to make the case for Crossrail 2.

### ***Sutton Link***

TfL supports the inclusion of references to the Sutton Link but would like to ensure that these include the possibility that it could be provided by tram or bus rapid transit. Please see TfL response for detailed comments relating to the Sutton Link.

### **Next stages**

The Mayor will provide 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. In particular, I would welcome discussion on how Merton can accommodate the level of housing in the new London Plan and deliver 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

TfL ref: 18/4782

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[by email only]

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17 December 2018

Dear Sir/Madam,

### **Re: Merton Local Plan 2020 and Future Wimbledon Masterplan – combined response**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Property to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on the Merton Local Plan 2020 and the Future Wimbledon Masterplan. We welcome and support proposals to increase density in Merton, with density optimised taking into account public transport connectivity and capacity, and access to town centre amenities and services. The step-change in connectivity facilitated by Crossrail 2 will help unlock significant growth potential in Wimbledon, and enable development to be delivered successfully at higher densities.

The draft London Plan was published in December 2017 and was open for public consultation until March 2018. Following the consultation, a revised draft was published in August 2018 showing Minor Suggested Changes made in response to consultation comments. The draft London Plan is a material consideration in assessing local policy and determining planning applications.

### ***Merton Local Plan 2020***

TfL supports Merton's vision to embed health and wellbeing into development. These strategic objectives promote creating streets that encourage walking, cycling and public transport, that balance the needs of all road users and support growth taking into account public transport accessibility, character and infrastructure.

We note that the Merton Local Plan 2020 does not include a separate transport section. This does not reflect the strategic importance of transport. We strongly recommend the inclusion of a transport section with clear policies.

The policies and supporting text should make specific reference to the Mayor's Vision Zero for road casualty reduction.

It is important that the borough's growth aspirations incorporate Mayoral policy objectives and reflect the Healthy Streets Approach in line with the draft London Plan and Mayor's Transport Strategy.

Proposals for new development should be supported by a Transport Assessment, developed using the latest TfL Best Practice Guidance. Applications should also be accompanied by a Travel Plan, Construction Logistics Plan, Delivery and Servicing Plan, and Parking Design and Management Plan in accordance with TfL guidance.

### ***Future Wimbledon Masterplan***

We broadly support the higher density development shown as part of the Masterplan. Future development should align with Policy GG2 in the draft London Plan which seeks to intensify the use of land and promote higher density development, particularly in areas well-connected by public transport.



The Masterplan identifies ten priorities to guide development in each of the Masterplan neighbourhoods. Of most relevance to TfL are:

- Greening Wimbledon
- Public Space
- Traffic Intervention
- Transport Interchange; and
- Development over the railway.

The Traffic Intervention priority highlights the requirement for further work to support traffic management and traffic reduction schemes. TfL should be involved in any transport study produced to support these schemes. Any proposals in the Future Wimbledon Masterplan which seek to alter the way general traffic currently accesses and travels through Wimbledon town centre should be modelled and assessed to fully understand local and wider transport network impacts. This should be undertaken before any preferred proposals for changing the operation of the local transport network are put forward. We therefore strongly support the use of an Opportunity Area Planning Framework (OAPF) to provide a more detailed policy framework for development in Wimbledon. TfL and Crossrail 2 should be engaged from an early stage when this is produced.

The Masterplan area is well connected by public transport, with a Public Transport Access Level (PTAL) of 5 to 6b. In accordance with the draft London Plan, all development in the Masterplan area should be car-free, excluding disabled persons parking and operational parking. A map showing the PTAL of the Masterplan area should be shown. All development will be expected to meet or exceed draft London Plan long-stay and short-stay cycling parking standards.

### ***Wimbledon / Colliers Wood / South Wimbledon Opportunity Area***

Opportunity Areas are expected to aspire to more ambitious mode share targets and to meet or exceed indicative guidelines for new homes and jobs as set out in the draft London Plan to fully realise their growth potential. The Merton Local Plan 2020 and Future Wimbledon Masterplan should set out how growth will be phased in order to maximise the benefits of major infrastructure improvements such as Crossrail 2 and the Sutton Link.

### ***Crossrail 2***

Crossrail 2 is a proposed new railway that will bring about transformational change along its corridor and across Merton, unlocking significant growth potential and improving public transport connectivity and capacity. Crossrail 2 needs a more explicit introduction in the Merton Local Plan 2020, ideally in a new chapter on transport. The Merton Local Plan 2020 should be clear that the scheme has three proposed stations in the borough at Wimbledon, Raynes Park and Motspur Park.

We recognise the need for a long term vision for the development of Wimbledon town centre, and support the opportunity that the Future Wimbledon Masterplan offers for a more planned and coordinated approach to growth and investment. A key objective of Crossrail 2 is to integrate new transport infrastructure into local areas and create high-quality places and support regeneration. We generally support the aim to improve the public realm in Wimbledon town centre. Consideration should be given to the phasing of public realm improvements near any future Crossrail 2 construction sites to minimise abortive investment.

Land around Wimbledon station has been identified and safeguarded in the Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015 (see Appendix D). Safeguarding is an established part of the planning system which protects the future possibility of a railway being built and ensures that anything built within the boundaries identified in the directions allows for the future construction of Crossrail 2. TfL will continue to work with Government to make the case for Crossrail 2.

### ***Sutton Link***

TfL supports the inclusion of references to the Sutton Link but would like to ensure that these include the possibility that it could be provided by tram or bus rapid transit. Please see Appendices for detailed comments relating to the Sutton Link.

We have set out a number of comments and proposed changes on the following pages which we hope are helpful. Appendix A provides detailed comments on the Merton Local Plan 2020 and Appendix B provides detailed comments on the Future Wimbledon Masterplan. We look forward to continuing our work together in drafting the final documents. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth in Merton and across London.

I trust that the above provides you with a better understanding of TfL's position on the Merton Local Plan 2020 and the Future Wimbledon Masterplan. Please do not hesitate to contact me should you have any queries or clarifications about these comments.

Yours faithfully,

**Josephine Vos | Acting Manager**  
**London Plan and Planning Obligations team | City Planning**  
Email: [josephinevos@tfl.gov.uk](mailto:josephinevos@tfl.gov.uk)

Appendix A: Specific suggested edits and comments from TfL on Merton Local Plan 2020

Section	Track change/comment
Throughout	All references to Crossrail 2 should spell out the scheme in its entirety and not use "CR2" or "Crossrail2".
Key Diagram	Please amend text: "London Underground Stations" "London Trams Stops" "Northern Line Underground" "District Line Underground" "London Trams Line" " <del>Tram extension options</del> Proposed Sutton Link" "Opportunity Areas <del>Planning Frameworks</del> "
Vision and Strategic Objectives	Please identify Crossrail 2 in the Spatial Vision and supporting diagrams
Vision and Strategic Objectives	Please amend paragraphs 1.21, 1.26 and 1.28 to recognise that the expectation is that the opening year of Crossrail 2 will be during the mid-2030s, Our experience with the Elizabeth line shows that a significant amount of development as a result of the scheme has occurred in advance of its opening.
Strategic objective 1: Healthy Places	Please add extra bullet point: <b>"e. Using the Healthy Streets Approach to prioritise health in all planning decisions."</b> This should be strengthened by including the Healthy Streets 'wheel diagram' (see Appendix C).

Section	Track change/comment
Strategic Objective 3: Housing	Please add extra bullet point: <b>“c. Ensuring that development makes the most efficient use of land and is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport, and access to amenities and services.”</b>
Strategic Objective 5: Infrastructure	Please amend bullet point: “c. Developing improvements to the public highway that balance the needs of all road users <b>using the Healthy Streets Approach</b> ”. Please strengthen this by including the Healthy Streets ‘wheel diagram’ (see Appendix C).
Strategic Policy HW2.1	Please amend policy HW2.1 (i): “Ensuring that neighbourhoods are well designed and promote healthier living, active living and adopt active aging approaches. <b>Streets should be designed using the Healthy Streets Approach to encourage active travel.</b> ”
Policy N3.1 Colliers Wood	We support identification of Colliers Wood as a future potential District centre. In order to successfully classify Colliers Wood as a town centre, it is important that a strategy is implemented that commits to reducing reliance on car travel, creates public realm improvements, encourages walking, cycling and public transport use, and integrates Colliers Wood into the surrounding area.
Policy N3.1 (g)	Please amend text: “g. Supporting development which <del>helps to</del> <b>optimises density housing potential and quality, traffic flow and the, improves the</b> public realm <b>and helps manage the movement of people and goods;</b> ”
Policy N3.1 (h)	Please amend text: “h. Supporting improvements to the Wandle Trail and other transport infrastructure that will help to <del>reduce</del> <b>manage</b> road congestion and improve the public realm, particularly for pedestrians and cyclists;
Policy N3.2 paragraph 3.2.8	Please amend text: “The council will continue to campaign for increased rail services, particularly at Mitcham Eastfields, and will continue to support the Merton-Sutton <del>Tram</del> link. <b>This would improve the destinations reachable from Mitcham via the existing London Trams network and provide interchange options to connect to stations down to Sutton.</b> ”
Policy N3.3 Morden	We support optimising density in the Morden Regeneration Zone and the Wider Morden Town Centre Area. TfL should be consulted at the earliest stage for planning applications in this area to best assess any impact on TfL services.

Section	Track change/comment
Policy N3.3 (l)	This policy states that Merton would like to improve “connectivity between the Underground depot and Morden South Station” in order to support transport improvements. TfL requests clarity on this policy as the current wording is vague.
Policy N3.3 paragraph 2.3.36	Please amend text: “TfL is currently working <b>to develop a direct, high capacity transport link</b> <del>towards an extension of the existing London Trams network</del> between Wimbledon and Sutton, via Morden, known as the Sutton Link. <b>This could be provided by a tram or by bus rapid transit.</b> A consultation <del>will begin at the end of October</del> <b>was held in</b> 2018 with three potential route options for a new link, with one passing along the eastern edge of the Morden Regeneration Zone. The council will continue to work with TfL and Sutton Council to explore these route options and the potential for a Morden interchange between the <del>tram</del> <b>Sutton Link</b> and <b>London Underground.</b> ”
Policy N3.3	Please amend text: “ <del>create healthier streets with better</del> <b>use the Healthy Streets Approach to improve</b> connectivity and permeability for pedestrians and cyclists;” Please amend text: “reduce traffic dominance, <b>and</b> improve walking, cycling and <del>vehicle links</del> <b>public transport</b> into and around the town centre;”
Policy N3.4 Raynes Park	Crossrail 2 is generally supportive of Policy N3.4. New infrastructure works required at Raynes Park station will offer the opportunity to enhance Policy N3.4 through providing opportunities for public realm improvements and investment.
Policy N3.6 paragraph 3.6.13	We generally support policy N3.6 and its ambitions to promote and strengthen its role as a town centre. As identified in paragraph 3.6.13, Crossrail 2 will be ‘a key driver of change in Wimbledon’. We agree that Crossrail 2 will ‘open up new opportunities for creating new public space around the station and improving links across the railway lines’ however there are wider opportunities that exist and should be mentioned. We suggest the addition of the following text to the end of paragraph 3.6.13: “ <b>Options currently being considered for Crossrail 2 could provide the ability to deliver improvements at Wimbledon station which can improve connectivity across the railways, enable Over Site Development, and offer opportunities for wider reorganisation of all modes of transport.</b> ”

Section	Track change/comment
Policy N3.7 (i)	Please amend text: "i. Seek improvements to the transport accessibility to and within the area, <b>including supporting the Sutton Link project which is consulting from October 2018 on the provision of a tram or bus rapid transit link with route options connecting Wimbledon, South Wimbledon or Colliers Wood with Sutton Town Centre.</b> "
Policy O8.4 (h)	Please amend text: "h. Expect proposals for new and replacement trees, hedges and landscape features to consist of <b>where possible</b> appropriate native species to the UK <b>but accepting that in future proofing the natural environment against climate change non-native trees and plants must also be considered;</b> " Please add the following as supporting text: "With longer, hotter, drier summers and milder winters with more intense periods of rain we must also look to future proofing our natural environment and consider more non-native trees and plants which will cope with these more extreme conditions. This is particularly pertinent to urban areas where more extremes of climate change can be experienced."
Site Mo4 Morden Regeneration Zone	Please amend text: "Sutton Link – <del>potential tram extension</del> <b>this scheme is being developed to provide a direct, high capacity transport link (provided by tram or bus rapid transit) with one of the proposed options running between South</b> Wimbledon and Sutton along the eastern edge of the site."
Sites RP3 Burlington Road, Tesco, RP4 Bushey Road and RP8 West Barnes Library	Site allocations RP3, RP4 and RP8 are all located outside the Limits of Safeguarding for Crossrail 2 as set out in the 2015 Safeguarding Directions. In the event that powers to deliver Crossrail 2 are approved then these sites or parts of these sites, have been identified as land that could be required to deliver and/or construct Crossrail 2. We therefore suggest that Merton continue to engage with Crossrail 2 around how these sites could be required and, if they are, could be brought back into use and appropriately phased in order to maximise the overall benefits.

Section	Track change/comment
Site RP7 Rainbow Industrial Estate	<p>To accommodate Crossrail 2, new infrastructure will be required at Raynes Park Station, which is likely to involve lengthening of platforms to accommodate the new and longer Crossrail 2 trains. As a result, additional land outside of the railway boundary may be required. Site RP7 has not been safeguarded for Crossrail 2 (and/or by the DfT) under the 2015 Safeguarding Directions. However, in the event that powers to deliver Crossrail 2 are approved this site has been identified as land that may be required as part of a worksite necessary to deliver the Crossrail 2 scheme. Site allocation RP7 could therefore compromise options for delivery that the Crossrail 2 project is able to take forward. With this considered, we suggest amending text on page 172 to as follows:</p> <p>“The site is adjacent to a Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2, however the site has not been safeguarded by Crossrail 2 <b>under the 2015 Safeguarding Directions. If this land is required to accommodate the scheme, and safeguarded at a later date, this may cause delay to delivery of the whole site development although could offer longer term redevelopment opportunities in the latter part or outside of the plan period.</b>”</p>



## Appendix B: Specific suggested edits and comments from TfL on Future Wimbledon Masterplan

Page	Track change/comment
40	Please add text below the subsection on Crossrail 2: <b>“Proposed Sutton Link Further improves connectivity by providing a tram or bus rapid transit link between Wimbledon and Sutton town centre.”</b>
53	Please amend text: “The tram has transformed travel opportunities in the area and provides the potential for further growth in homes and jobs. The <del>proposal to extend the tram to Sutton Town Centre,</del> <b>proposed Sutton Link would improve connectivity between Wimbledon, Sutton town centre</b> and potentially beyond to the proposed Cancer Hub, <del>would</del> <b>would improve</b> public transport accessibility to the town centre and St Helier Hospital, and <del>supporting</del> <b>supporting</b> the delivery of at least 10,000 <b>new</b> homes. <b>Depending on the final option this could be direct or via interchange from the existing Wimbledon tram at Morden Road or Belgrave Walk. Options are being consulted on with the aim of submitting an application for planning consent in 2020.”</b>
54	Please amend text: “The masterplan is not <del>wholly reliant dependent</del> <b>wholly reliant dependent</b> on Crossrail 2, <del>but the vision set out in the document could only be fully realised through improvements to Wimbledon Station and the wider transport network. but sets out a vision for how Crossrail 2 could integrate with the town centre and deliver new infrastructure, vital to support growth.</del> <b>Options currently being considered for Crossrail 2 could provide the opportunity to increase transport capacity, provide a catalyst for significant inward investment and provide new development sites.”</b> Crossrail 2 could bring transformational opportunities to Wimbledon. While the vision is not wholly dependent upon planned transport infrastructure (such as Crossrail 2) coming forward, it can only be fully realised through improvements to Wimbledon station and the wider transport network. This amendment provides clarity and further detail on exactly what opportunities Crossrail 2 can bring to Wimbledon town centre.
66	TfL recommends that the priorities reference promoting active travel, public transport and the Vision Zero approach to eradicating deaths and serious injuries from roads.
68	The priorities of greening Wimbledon to improve the environmental quality of streets and quality public spaces both follow the Healthy Streets Approach. Although TfL would recommend that a direct reference is made to the Mayor’s Healthy Streets Approach. We suggest reinforcing this through use of the Healthy Streets ‘wheel diagram’ (see Appendix C).

# Transport for London



## Appendix C: Healthy Streets Wheel



Source: Lucy Saunders

## Appendix D: Crossrail 2 safeguarding in Wimbledon

