

**Tara Butler**

Future Merton Team  
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**Department: Planning**

Our reference: LDF24/LDD08/LP03/HA01

Date: 01 February 2021

By email: [Tara.Butler@merton.gov.uk](mailto:Tara.Butler@merton.gov.uk)  
[future.merton@merton.gov.uk](mailto:future.merton@merton.gov.uk)

Dear Tara,

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Merton's New Local Plan Stage 2a Consultation (Regulation 18 3<sup>rd</sup> consultation)**

Thank you for consulting the Mayor of London on the London Borough of Merton's Regulation 18 draft Local Plan. As you are aware, all Development Plan Documents in London 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 afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

This letter provides focused guidance to ensure that the draft Local Plan is consistent with the current London Plan and the Publication London Plan (PLP).

**The London Plan**

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Secretary of State wrote to the Mayor on 29 January 2021 advising him that he can now publish his plan and as such the Publication London Plan and its evidence base are now material considerations and have significant weight. Publication of the final version of the new London Plan is anticipated before the end of this financial year, at which point it will form part of Merton's Development Plan and contain the most up-to-date policies.

## **General**

The draft Plan begins by setting out clearly the challenges that it seeks to address including the supply and cost of housing in the borough, growing inequality and adapting to climate change. The setting of these priorities early on then leads seamlessly into the main objectives of the plan and this logical progression is welcomed. The objectives include locating higher density development in the right places in the borough, promoting mixed use developments and the creation of 20-minute neighbourhoods. The borough's priorities and objectives align well with the Mayor's good growth objectives, especially GG2 making the best use of land, GG3 creating a healthy city and GG4 delivering the homes that Londoners need.

The intention to focus growth in Wimbledon/Colliers Wood/South Wimbledon Opportunity Area and Morden Town Centre is illustrated on the key diagram on page 12. The legibility of the key diagram could be improved so that it can be easily read by everyone.

Recognition of the Opportunity Area (OA) and its ability to accommodate growth is welcome but Merton should note that the indicative figures for growth as set out in Table 2.1 of the PLP for 5,000 new homes and 6,000 new jobs are not targets. These figures should form the starting point from which Merton can carry out more precise local level exploration of what can be achieved in terms of the OA's ability to accommodate growth. It should also be noted that the indicative figures for growth in Table 2.1 are projected up to 2041 and are not for a ten-year period as the draft Plan suggests. Merton should also define the OA boundary clearly on maps.

The proposed plan period should be set out clearly early on. As currently drafted, page 12 refers to growth up to 2036 and as it is not made explicitly clear we can only assume that this would constitute the end of the plan period. However, draft Policy H4.1 refers to the period 2020 – 2035 and clarity on this matter is advised.

The priorities for the growth areas identified in Chapter 2 are clear and welcome but regard should be had to Table A1.1 of the PLP which identifies the town centres of Wimbledon, Mitcham, Morden and the potential district centre of Colliers Wood and broadly categorises their potential to accommodate different types of growth, including residential and office development.

As currently drafted, while we welcome the objectives above, Merton's Local Plan would not be in general conformity with the PLP based on the intended approach to affordable housing. This is discussed in more detail subsequently. Please note, however, that GLA officers are happy to continue working with Merton to arrive at an acceptable approach and to bring the draft Plan into general conformity with the PLP.

## **Housing**

Draft Policy H4.2 of Merton's Plan sets out an ambition to deliver 13,263 additional homes for the period 2020 – 2035 (842 new homes a year) but it is not clear how Merton have arrived at this figure. Merton's housing target is set out in Table 4.1 of the PLP which is for the delivery of 9,180 new homes for the period 2019 to 2029, or 918 new homes a year. The planning practice guidance is clear that where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit

their local housing need figure when preparing new strategic or non-strategic policies. (Paragraph: 013 Reference ID: 2a-013-20201216).

Merton should therefore amend Policy H4.2 accordingly to subscribe to the housing target set out in Table 4.1 of PLP.

The PLP sets the small housing site targets for all London boroughs in Table 4.2. For Merton, this equates to 261 new homes a year and should form a part of the overall housing target for the borough and should be reflected in a policy.

Paragraph 4.2.4 of the draft Plan suggests that the housing target in the 2016 London Plan (411 new homes a year) should be followed but doing so would be confusing for prospective developers and render the draft Plan out of date as soon as the PLP is finalised. In addition, the PLP has been rigorously tested through examination and is a material consideration with considerable weight.

Following recent discussions with Merton officers, it appears that it is the borough's intention to adopt a stepped housing target. This approach could be consistent with the PLP and as set out in paragraph 4.1.10 it should be supported by a clear articulation of how these homes will be delivered and any actions the borough will take in the event of under delivery.

Merton should note that where boroughs require a housing target beyond 2029 the PLP is clear in paragraph 4.1.11 that targets should draw on the 2017 SHLAA findings (which cover the period to 2041) and any local evidence of identified capacity in consultation with the GLA, and should also take account of any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions for small sites.

### **Affordable Housing**

The Mayor is pleased that Merton, in draft Policy H4.1, intend to follow his strategic target for 50% of all new homes to be affordable as set out in Policy H5 of the PLP. However, part (f) of the draft policy seeks net affordable housing provision which is not consistent with Policy H5B of the PLP which requires that affordable housing should be based on gross residential development. In addition, there is no explanation for this divergence from the PLP. There is no reference to the Mayor's threshold approach to affordable housing within the draft Policy. However, paragraph 4.1.25 does refer to the fast track route, which states that:

'For non-GLA referable, to be eligible for the fast track route, Merton's minimum 50% affordable housing unit threshold applies to public sector land and industrial land and 40% for all other sites and land.'

It should be made explicitly clear within the body of a policy whether it is Merton's intention, or not, to follow the Mayor's threshold approach to affordable housing.

The Mayor's threshold approach sets the threshold level for affordable housing at 35% on privately owned land and 50% on publicly owned land or on industrial land **where development would result in the loss of industrial capacity**. Merton should note that these thresholds are not targets, but rather set the level above which viability assessments are no longer required as part of the planning process. Even where developers follow the threshold approach, they are required to seek grant to increase the level of affordable housing as set out in part C of Policy H5 of the PLP. Merton's intention to set threshold levels which are different to the ones set by the Mayor should

be supported by appropriate evidence. The Local Plan Housing Viability Study indicates that the emerging policy is for 35-50% affordable housing rather than 40% as set out in draft Policy H4.1. The main body of the report does not refer to, or recommend, a 40% target. 40% is generally only achievable on lower existing use value sites including those for community and industrial uses, with some exceptions in the highest value areas. In fact, Merton's Viability Study aligns relatively well with the London Plan threshold levels of 35% and 50% on public and industrial land where there would be a resulting loss of industrial capacity. Applying a 40% target runs the risk of forcing applicants that could have delivered 35% down the Viability Tested Route which might result in lower affordable housing offers.

Draft paragraph 4.1.24 sets out Merton's intention to assess affordable housing proposals in terms of numbers of dwellings which is not consistent with paragraph 4.5.3 of the PLP which sets out that affordable housing should be measured in terms of habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family sized homes. In some instances, it may be more appropriate to measure provision in terms of habitable floorspace. Draft Plan paragraph 4.1.28 states that measuring affordable housing based on habitable room is confusing and would result in the delivery of fewer affordable homes being delivered. It is not clear how Merton have arrived at this conclusion nor has it been justified through evidence. The benefit of measuring affordable housing delivery by habitable room and in some instances by habitable floorspace is so that it is comparable to the market housing component of proposals and to avoid disincentivising larger affordable units.

The Mayor welcomes Merton's intention to secure affordable housing contributions from small developments in the form of off-site provision or cash in lieu payments, which is consistent with paragraphs 4.4.9, 4.4.10 and footnote 55 of the PLP. Cash in lieu contributions should be held in a separate affordable housing pot, where they can be ring-fenced to enable greater, or more appropriate, new provision to be made off-site in accordance with paragraph 4.4.12 of the PLP. Merton should also note that to avoid incentivising off-site provision or in lieu contributions, agreements should provide no financial benefit to the applicant relative to on-site provision and review mechanisms should be included in accordance with the Viability Tested Route (VTR) as set out in paragraph 4.4.13 of the PLP.

To be clear, Merton's approach to affordable housing should be amended to bring it into general conformity with the PLP. Based on the evidence put forward, Merton should follow the Mayor's threshold level of 35% on privately owned land and 50% on industrial land where development would result in a loss of industrial capacity as alternatives have not been justified. Affordable housing calculations should be based on habitable rooms, and in some cases, habitable floorspace, but should not be based on numbers of dwellings. Finally, affordable housing provision should be based on gross residential development and not on net affordable housing development as set out in Policy H5 of the PLP.

With regard to the proposed affordable housing tenure split, Merton should note the Mayor's preference for social rent and London Affordable Rent as set out in paragraph 4.6.3 of the PLP. London Affordable Rent is generally more affordable, with benchmark rents set annually by the Mayor.

Draft Plan paragraph 4.1.12 recognises the difficulty in bringing forward low cost rented housing and Merton should note that the new [Affordable Homes Programme](#) makes funding available for social rent products which should help to alleviate that issue.

### **Build to rent (BTR)**

The draft Plan recognises that BTR offers another type of housing product which increases the range of types of homes available to Londoners, and this is welcome. However, as currently drafted Policy H4.7 is considered to be overly onerous and diverges significantly from the approach set out in Policy H11 of the PLP. For example, Policy H4.7 intends to make it a requirement that BTR proposals provide 40% affordable housing (all as London Living Rent (LLR)) rather than applying the Mayor's threshold approach and allowing for a split of 30% LLR and 70% Discounted Market Rent (DMR). The proposed covenant is for a period of 30 years and where the value of the BTR scheme is higher than a 'for sale' scheme, the affordable housing requirements of H4.7(f) must be met and increased until there are no benefits to providing BTR. As drafted, the requirements for delivering BTR schemes in Merton would be very challenging and would likely result in nearly all BTR schemes having to submit viability information with the potential implication of lower affordable housing delivery. This seems to be recognised in part (j) of the policy which appears to require viability reviews in all circumstances. The concern with this approach is that it would not incentivise BTR providers to increase the level of affordable housing to the threshold level to follow the Fast Track Route (FTR) and thereby avoid late stage reviews. The policy should be reviewed in light of these comments and where the proposed approach diverges from the PLP it should be supported by evidence and the reasons for doing so made clear.

### **Student housing**

The PLP at paragraph 4.15.1 makes it clear that student accommodation is an element of overall housing need for London determined in the 2017 Strategic Housing Market Assessment (SHMA) 2017. Merton's draft plan should take account that new flats, houses or bedrooms in purpose-built student accommodation all contribute to meeting London's housing need. In light of this, Merton should review draft Policy H4.5 to ensure that it is not overly restrictive and to recognise the role that purpose-built student accommodation plays in meeting housing need in London.

### **Gypsy and Traveller accommodation needs**

The Mayor welcomes Merton's intention to update their most recent needs assessment as part of the Local Plan evidence base. As set out in paragraph 4.14.5 of the PLP to assist boroughs in meeting identified need, Mayoral funding will be available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches. Merton should follow the guidance set out in Policy H14 of the PLP which sets out that boroughs should plan to meet identified need for pitches and must include ten-year pitch targets in Local Plans.

### **Climate change**

The Mayor welcomes LB Merton's intention to put climate change at the very heart of the draft Plan and its ambition to become net-zero carbon by 2050. This is in accordance with Policy SI 2 and the Mayors priorities as set out in paragraph 9.2.1 of the PLP. Where Merton propose that all residential development and all non-residential development of

500sqm or more GIA should be net-zero, the PLP makes it a requirement for major development only in Policy SI 2A. While the Mayor commends Merton's positive response to the climate emergency, Policy DF1D should be applied, which prioritises affordable housing and necessary transport improvements to those situations where viability is called into question.

### **Tall Buildings**

The draft Plan sets out that tall buildings will only be acceptable in Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area. The Mayor welcomes that the very end of draft Policy LP D5.1 refers to PLP Policy D9 and defines tall buildings as those that are over 6 storeys in height but then includes the less specific 'substantially taller than their surroundings and cause significant change to the skyline'. It is considered that the definition is best placed earlier on in the draft policy so that the definition is clear from the start. As there is some ambiguity in Merton's current proposed definition, appropriate building heights should also be set out within the relevant site allocations so that what constitutes a tall building is explicitly clear in specific locations and is consistent with Policy D9 of the PLP.

### **Economy and town centres**

In order for Colliers Wood to become formally designated as a District Town Centre Merton should demonstrate, as part of the Local Plan process how it would support and promote the centre's transformation by moving away from car-based travel and through opportunities for residential mixed-use development in the area. The process and its implementation should be supported via a town centre strategy which could be set out within the draft Plan itself or in a separate document.

### **Industry**

The Mayor welcomes Merton's intention in draft Policy EC7.1 to protect and manage Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) so that they are prioritised for industrial and distribution uses that can operate over a 24-hour period which is consistent with the approach set out in Policies E4 and E7 of the PLP.

The Council makes clear in paragraph 7.1.10 that it wishes to support those industrial activities which promote jobs growth and will therefore not support sole storage functions, particularly self-storage. This is not consistent with Policy E4A of the PLP which sets out the range and types of uses which are acceptable in London's industrial areas, including B8 uses, and the mechanisms by which self-storage could be considered differently from other B8 uses is not clear. Draft paragraph 7.1.10 should be amended accordingly.

### **Metropolitan Open Land (MOL)**

Any intention to alter the boundary of MOL should be done via the Local Plan process in accordance with Policy G3C of the PLP. Therefore, any proposed or likely MOL boundary changes should be clearly reflected in maps and may benefit from inclusion as specific site allocations. As the Mayor affords MOL the same status and level of protection as Green Belt, Policy G2B is applicable in addition to the tests set out in the NPPF, in which case the council will need to demonstrate exceptional circumstances to support any inappropriate MOL development.

Where replacement MOL is proposed to mitigate for losses, policies should be in place to ensure that the re-provision of MOL should meet the criteria set out in Policy G3B of the PLP.

### **Green infrastructure**

The Mayor welcomes that Merton are promoting the urban green factor (UGF) in accordance with Policy G5 of the PLP but should note that the factors set out in that policy should be used in the interim until the borough can develop a UGF tailored to local circumstances as set out in Policy G5(B) of the PLP.

### **Air quality**

The Mayor welcomes the intended approach to require all developments which are subject to an Environmental Impact Assessment to be Air Quality Positive which is consistent with Policy SI 1 of the PLP. Merton is home to four Air Quality Focus Areas and these should be illustrated clearly on maps. These are located at Raynes Park junctions Kingston Road/Bushey Road, Wimbledon The Broadway/Merton Road/Morden Road/Kingston Road, Mitcham London Road A216 from Cricket Green to Streatham Road Junction and at Morden Road/Crown Lane / London Road. Merton should recognise that development proposals in Air Quality Focus Areas should demonstrate that design measures have been used to minimise exposure to poor air quality in accordance with Policy SI 1B2 of the PLP.

### **Waste**

The Mayor welcomes Merton's intention to meet their pooled waste apportionment targets as set out in Table 9.2 of the PLP as part of the South London Waste Plan (SLWP). The Mayor notes that the SLWP has very recently been submitted for examination and he has expressed some concerns in response to its Regulation 19 consultation. In the meantime, Merton should make sure that its safeguarded waste sites are clearly illustrated on the borough's policies map and are safeguarded from inappropriate development until the SLWP is formally adopted.

The Mayor welcomes Merton's support for a circular economy approach and the borough is encouraged to promote the use of Circular Economy Statements in accordance with Policy SI 7 of the PLP.

### **Site allocations**

Site RP2 Burlington Road, 245-247 New Malden, KT3 4NE – this site is part of a larger Locally Significant Industrial Site. The draft allocation proposes the de-designation of the site to introduce commercial, business and other uses considered more appropriate for a residential area. The proposal would sever the eastern part of the remaining LSIS from the western part (essentially a wedge in the middle) and could potentially weaken the integrity of the entire LSIS as a result. In accordance with Policy E7 of the PLP Merton should conduct a masterplan for the entire LSIS, or conduct further work as part of the Local Plan, to explore the area's potential to support the co-location of non-industrial uses within the area. Alternatively, if it is sufficiently established that de-designation of part of the site is appropriate, a masterplan, or further investigation, would provide the opportunity to explore which parts of the site would be most suitable for release, while seeking opportunities to intensify other parts to mitigate the loss of industrial capacity and to ensure that the remaining LSIS retains its integrity to function

effectively for industrial purposes. Please also see the [Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches](#).

Site RP7 Rainbow Industrial Estate, Grand Drive, Raynes Park, SW20 0JY - This site is designated LSIS and as such the intention to introduce non-industrial uses within the area should follow the guidance set out in Policy E7 of the PLP and the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches. There is a planning brief that was adopted for the area in 2013. Where the brief does state that there should not be a loss of employment floorspace as a result of development, we would suggest that the correct approach now would be that proposed redevelopment of the site should not result in the loss of industrial capacity in accordance with Policy E7 of the PLP.

The former Mitcham Fire Station is included as a site allocation twice and the draft Plan should be amended accordingly.

### **Next steps**

I hope these comments positively inform the preparation of the Merton Local Plan and we look forward to continuing to work with you to ensure it aligns with the Publication London Plan as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on 020 7983 4000 or at [hassan.ahmed@london.gov.uk](mailto:hassan.ahmed@london.gov.uk).

Yours sincerely



Lucinda Turner

### **Assistant Director of Planning**

Cc Leonie Cooper, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG



## Annex 1 – Transport for London Comments

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[by email only]

**Transport for London**

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1 February 2021

Dear Sir/Madam,

### **Re: Merton Draft Local Plan – stage 2a consultation**

*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 do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment as part of the stage 2a consultation on Merton's Draft Local Plan.

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Publication London Plan and its evidence base are now material considerations and have significant weight. Publication of the final version of the new London Plan is

anticipated before the end of the financial year, at which point it will form part of Merton's Development Plan and contain the most up-to-date policies.

The approach of the Local Plan should be developed in line with relevant draft London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport, rather than by car. This is crucial to achieving sustainable growth, as in years to come, more people and goods will need to travel on a relatively fixed road network.

We welcome the broad approach of the Draft Local Plan where it addresses these issues. TfL generally supports the policies set out in the transport chapter of the Merton Local Plan 2020, and in particular strongly welcomes the proposed approach to cycle parking and car parking. We have set out a number of comments and proposed changes on the following pages which we hope are helpful.

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.

Please do not hesitate to contact me should you have any queries or clarifications about these comments.

Yours faithfully,

**Josephine Vos | Manager**

**London Plan and Planning Obligations team | City Planning**

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**Appendix A: Specific suggested edits and comments from TfL on the Draft Merton Local Plan stage 2a**

Section		Track change/comment
<b>Colliers Wood</b>		
CW1		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
CW2		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24. As noted, it is within the consultation zone for the Northern line tunnels and so London Underground Infrastructure Protection should be fully consulted regarding any sub surface works.
CW3		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24. As noted, it is within the consultation zone for the Northern line tunnels and so London Underground Infrastructure Protection should be fully consulted regarding any sub surface works.
CW4		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24. As noted, it is within the consultation zone for the Northern Line tunnels and so London Underground Infrastructure Protection should be fully consulted regarding any sub surface works.
CW5		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
<b>Mitcham</b>		

Section		Track change/comment
MI1		As noted, the site is adjacent to tram tracks and, as such, consultation will be required with London Trams.
MI8		As noted, the site is adjacent to the London Road bus lane. Any negative impacts on bus operations, including during construction, should be minimised and mitigation provided.
MI12		The site provides bus drivers' facilities which must be retained and ideally enhanced as part of any redevelopment of the site. The site is close to the London Road bus lane. Any negative impacts on bus operations including during construction should be minimised and mitigation provided.
<b>Morden</b>		
3.3.26		<p>This paragraph needs to be updated to reflect the current status of the Sutton Link project: <i>'Work on the Sutton Link project was paused in July 2020 as it has not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge then the case for taking the scheme forward will be reviewed.'</i></p> <p>The extension of the tram network should be referred to as between Merton and Sutton, and the preferred route would not go via Morden town centre, so this should be removed.</p> <p>The second part of the paragraph should be reworded to state that the preferred route runs close to the Morden Regeneration Zone (i.e. at the Central Road roundabout). It could then state that the council will continue to work with TfL to explore how best the route between the regeneration zone/town centre and the proposed tram route could be enhanced to provide a good link between the town centre and the tram network towards Sutton.</p>

Section		Track change/comment
Mo4		We welcome the requirement for suitable alternative bus stand facilities which should be designed and located to ensure there is no loss of capacity or operational efficiency. The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
Mo5		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
Mo6		TfL welcomes application of the 'Agent of Change' principle to take account of the adjacent London Underground depot.
<b>Raynes Park</b>		

Section		Track change/comment
N3.4/3.4.14		<p>TfL welcomes the references to Crossrail 2 and the commitment to collaborative working. Please note the Crossrail 2 project update which is available on the Crossrail 2 website and states that:</p> <p>‘The funding agreement with the Government of 31 October 2020 includes a commitment by TfL in relation to Crossrail 2 that TfL “prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project as required.” We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme’s latest proposed route from future developments. We are in discussion with DfT on the likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed. Given TfL’s current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London’s growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right’.</p>
RP3		<p>The site is close to the A3 which forms part of the TLRN. No new access or servicing should take place from the A3.</p>
RP4		<p>The site is close to the A3 which forms part of the TLRN. No new access or servicing should take place from the A3.</p>

Section		Track change/comment
RP7		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2, although the site has not been safeguarded. Rather than stating that this may cause delay to delivery of the whole site, and taking account of the Crossrail 2 project update, we would prefer that there was a requirement for consultation and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward.
RP8		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2 although the site has not been safeguarded. Rather than stating that this may cause delay to delivery of the whole site, and taking account of the Crossrail 2 project update, we would prefer that there was a requirement for consultation and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward.
<b>Wimbledon</b>		
N3.6j		We welcome the intention to secure investment in Wimbledon station. This site is important for TfL operations including the District line and Tram as well as Crossrail 2 and so there will need to be extensive consultation with a number of different teams within TfL.
3.6.12/13		TfL welcomes the reference to Crossrail 2 and the commitment to collaborative working. Please note the Crossrail 2 project update set out above.
Wi5		The site is adjacent to the bus interchange. It is essential that any redevelopment of this site does not prejudice access to or the operational efficiency of the interchange.
Wi7		The site is adjacent to rail tracks used by the District line. London Underground Infrastructure Protection and Network Rail should be fully consulted regarding any works or development proposals that may impact on rail infrastructure. As noted, the site falls within Crossrail safeguarding limits. Please note the Crossrail 2 project update set out above.

Section		Track change/comment
Wi16		The site is adjacent to rail tracks which are used by national rail and District line services and will also form part of Crossrail 2. There will need to be wide consultation with Network Rail, TfL and Crossrail 2 to ensure that emerging development proposals protect transport infrastructure, are consistent with safeguarding and maximise the opportunities of this site.
<b>Places and Spaces</b>		
D5.2	Urban Design and the Public Realm	We welcome the emphasis on facilitating walking, cycling and use of public transport. However, this policy should also include reference to the application of the Healthy Streets Approach, the need to improve connectivity and to design and manage car parking so that it does not dominate the street or provide a barrier to safe and convenient movement on foot or by cycle.
<b>Climate Change</b>		
1.1.7		To achieve targets relating to climate change, the potential contribution of car free development to limiting transport emissions should be referred to in this paragraph.
<b>Economy and Town Centres</b>		
7.3 9e		The wording of criterion e should be modified to better reflect London Plan and Local Plan transport policies that require or encourage car free development. In this context, it is not appropriate to refer to the provision of 'adequate' car parking facilities. We suggest rewording as follows: 'Allow adequate safe vehicle access to and from the highway, provide <b>high quality cycle parking in line with policy T6.6, minimise car parking in line with policy T6.8</b> <del>adequate car parking facilities (both cycling and car parking)</del> and prioritise access by active travel and public transport <del>there should be links to modes of transport other than private vehicle</del> '.

Section		Track change/comment
<b>Blue and Green</b>		
1.1.203		We support the requirement for Construction Logistics Plans, but they should address strategic as well as local traffic impacts.
<b>Health and Wellbeing</b>		
HW2.1i	Health and Wellbeing	TfL welcomes the intention to apply the Healthy Streets Approach.
<b>Transport and Urban Mobility</b>		
All references		<p>Please amend the following to ensure consistency with the wording used in the London Plan.</p> <ul style="list-style-type: none"> <li>• Construction <del>and</del> Logistics Plans</li> <li>• Delivery and <del>Service</del> Servicing Plans</li> <li>• Replace vision zero with <b>The Mayor’s Vision Zero target for road safety</b></li> <li>• Replace healthy streets assessment with <b>Healthy Streets Assessment</b></li> <li>• Replace healthy streets approach with <b>Healthy Streets Approach</b></li> <li>• Replace Parking Management and Servicing Plan with <b>Parking Design and Management Plan</b></li> <li>• Replace references to Cycle Superhighway and Quietway with <b>Cycleway</b></li> <li>• Replace references to Tramlink with <b>London Trams</b></li> </ul>

Section		Track change/comment
Map	Proposed Cycling Measures/Existing Cycling Facilities/ Route Maps	It would be helpful to have a single map (or area maps) that indicated existing and proposed cycling facilities as well as information shown on the walking and cycling route maps. The proposed cycling measures and routes should be references in transport chapter policies and form the basis for seeking development contributions.
Map	Public Transport	The area maps appear to be overlapping. Either discrete area maps (linked to the neighbourhood chapters) or a single boroughwide map would be preferable. Routes for Tramlink should instead read 'London Trams'.
Map	Crossrail 2 safeguarding	It is not clear what is being shown by the thick black line as it does not appear to follow either the safeguarding or the rail lines in the background and therefore could be confusing. A map showing statutory safeguarding should be separate from an indicative route map which could be included on the public transport maps.
T6.4	Improving Travel Choices	<p>Although TfL welcomes the requirement for major sites to demonstrate how they contribute to Vision Zero, there is no explanation in either the policy itself or the justification that Vision Zero relates to the Mayor's 2041 target for road casualties. The wording appears immediately after a reference to the Council's carbon reduction objective of becoming net-zero carbon by 2050 which could lead to some confusion.</p> <p>We welcome the adoption of the Healthy Streets Approach and the requirement for developers to apply the Healthy Streets Approach using the TfL toolkit.</p> <p>It would be helpful if the policy also stated an aim of achieving the 2041 target of 73% of all trips on foot, by cycle or on public transport which is set out in the approved Merton Local Implementation Plan</p>

Section		Track change/comment
T6.5	Prioritising Walking	<p>To better reflect the London Plan, Part b of the policy should be amended as follows: ‘Contribute towards the delivery of liveable <b>car free</b> and low car neighbourhoods through better walking connections.’ An accompanying map showing priority areas to improve walking connections would be helpful in securing contributions from development.</p>
T6.6	Prioritising Cycling	<p>TfL broadly welcomes the positive approach of this policy.</p> <p>To better reflect the London Plan, part a of the policy should be amended as follows: ‘Ensure that cycle parking meets <b>or exceeds</b> London Plan (higher level minimum requirements) and London Cycle Design Standards...’.</p> <p>To clarify that part c refers to cycle hire, we suggest that the wording is modified to: ‘Major development should make provision for designated dock-less <b>cycle vehicle</b>-hire parking areas.’</p> <p>To expand on part d, it would be useful to set out the proposed cycle network, location of hubs and parking areas identifying any gaps that should be filled through contributions from development.</p>

Section		Track change/comment
T6.7	Managing Transport Impacts	<p>To ensure consistency with the London Plan and policy T6.8, part b should extend the areas where permit free development is promoted to include areas of PTAL 3-4 with a stronger requirement for permit free development in PTAL 5 – 6 (see comments below).</p> <p>To provide greater flexibility, the wording of part c could be amended to read: ‘Major development should be located around town centres or other areas with good connectivity by public transport or be able to demonstrate that planned and funded infrastructure <b>or service improvements would improve connectivity to provide the necessary public transport access and capacity</b>’ <del>raise the accessibility level.</del></p> <p>Part g should clarify that Construction Logistics Plans would be required for developments that could impact on the Strategic Road Network.</p> <p>Development funding may be required to support bus services, although a requirement to support demand responsive bus services will only be required in exceptional circumstances. As such, we suggest part i is simplified to read: ‘Make provision <b>and if necessary, provide funding towards</b> <del>for conventional and demand responsive</del> bus services.’</p> <p>An additional requirement should be for the submission of Delivery and Servicing Plans. Again, this is particularly important for sites close to the Strategic Road Network.</p>

T6.8	Parking, Deliveries and Servicing	<p>To better reflect London Plan policy T6, the wording of part a should be clarified to read: ‘Development should <del>only provide the level of car parking necessary</del> minimise the amount of car parking, taking into consideration the sites accessibility by public transport (PTAL) in accordance with London Plan parking standards. In PTAL (levels 5 &amp; 6) <del>a presumption in favour of</del> permit free development will apply. Elsewhere within a controlled parking zone <del>or where a controlled parking zone can be created</del> in areas of PTAL 3 or 4, the council will promote permit free development’</p> <p>The wording of part b should also be amended to read: ‘That <del>Disabled</del> parking for disabled car users is provided <del>accommodated within the development</del> and <del>is all such parking spaces are accompanied by</del> have an active electric vehicle charge point.’</p> <p>The wording of part e should be expanded to read: ‘Financial contributions will be sought for parking controls, <del>including the introduction of new or extended controlled parking zones,</del> where it is considered necessary to promote road safety and protect existing residential or business amenity.</p> <p>The wording of part k should provide more guidance on where delivery and collection facilities are appropriate because they can be significant generators of vehicle trips. We suggest that the wording is amended to read: ‘The Council will <del>only</del> support <del>local</del> distribution and collection facilities <del>in locations where the traffic impact can be minimised and maximum use is made of alternatives such as cargo bikes, e bikes or low carbon vehicles providing they are appropriately located and support low carbon vehicle fleets.</del></p> <p>Two new clauses should be added to confirm that, ‘Delivery and Servicing Plans will be required in accordance with TfL guidance’, and that where parking is provided, ‘Parking Design and Management Plans will be required in accordance with forthcoming TfL guidance’, with links provided to the latest guidance. The justification should confirm that residential parking spaces should be leased rather than sold in line with policy T6.1 in the London Plan.</p>
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Section		Track change/comment
		It would also be helpful if the policy provided support for moving freight by rail, water and non-motorised transport as well as the use of consolidation facilities, including micro consolidation.
T6.8	Justification	<p>The justification refers to the potential for car clubs. Car clubs may play a role in reducing car dependency, but only if they are paired with measures to reduce private car ownership, rather than effectively widening access to car use. The London Plan counts car clubs towards the maximum parking standards for this reason. The borough’s policy on car clubs should be consistent with London Plan policy T6.</p> <p>As stated, TfL supports the intention to promote permit free development but we recommend changing the wording of the following paragraph: ‘Where a residential or commercial development is situated within a controlled parking zone with connectivity by public transport of PTAL 3 or above, the council will promote permit free development secured via a legal obligation or unilateral undertaking. Permit free development will also be considered <del>directly</del> alongside busy public transport corridors, which fall below this PTAL level on a case-by-case basis where funded improvements to <b>active travel or</b> public transport are put in place to improve <b>connectivity</b>. <del>raise the PTAL level.</del></p> <p>The following paragraph could be deleted as it largely repeats the same message. <del>Outside town centres and along some transport corridors the level of public transport provision can fall away sharply as walk distances increase just beyond the measurement distances used for PTAL calculations. Where public transport services and facilities are increased to raise the PTAL level, permit free development will be considered by the council.</del></p>

Section		Track change/comment
T6.9	Supporting Transport Infrastructure	<p>To ensure consistency with policy T3 in the London Plan and taking account of TfL’s wide-ranging responsibilities for transport, we request that part a (iii) is redrafted as follows: ‘<b>Strategic transport authorities including TfL and any other relevant transport providers or operators are satisfied that the proposed development and/or alternative facilities will enable existing transport operations to be maintained and expanded if necessary</b>’ This is particularly important in the case of bus garages which may be owned and operated by third parties, although they play an essential role in maintaining the TfL bus network. Reference should be made to policy T3 in the London Plan and Table 10.1 which lists strategic transport projects.</p> <p>In part b it should be noted that statutory safeguarding is in place for Crossrail 2.</p> <p>In part d TfL welcomes the support given to infrastructure to decarbonise bus operations.</p>

T6.9	Crossrail 2	<p>The latest project update is available on the Crossrail 2 website and states that:</p> <p>‘The funding agreement with the Government of 31 October 2020 includes a commitment by TfL in relation to Crossrail 2 that TfL “prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project as required.” We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme’s latest proposed route from future developments. We are in discussion with DfT on the likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed. Given TfL’s current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London’s growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.’</p> <p>Land within the borough has been identified and safeguarded in the Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015. We are awaiting further updates to these Safeguarding Directions. Within Raynes Park, some of the site allocations potentially conflict with the sites needed to deliver Crossrail 2; however, none of the sites south of Wimbledon Town Centre or the onward connection onto the South West Main Line is formally safeguarded. Proposals for Crossrail 2 envisage an onward connection south of Wimbledon onto the South West Main Line corridor. This will require some additional new track between Wimbledon and New Malden. Both Raynes Park and New Malden stations would also require work to accommodate both the new infrastructure and to help speed up interchanges between</p>
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Section		Track change/comment
		services. This is likely to involve the lengthening of platforms to accommodate longer Crossrail 2 trains.
T6.9	Sutton Link	<p>The preferred route to Colliers Wood is correctly identified.</p> <p>A potential tram extension South Wimbledon to Sutton is also mentioned but the wording is unclear; the policy 'requires that proposals to demonstrate could be accommodated'. We assume this should state that it requires that proposals to demonstrate that the tram extension to South Wimbledon could be accommodated. It would be better to refer to a branch of the tram network to serve South Wimbledon rather than referring to South Wimbledon to Sutton. This is because should the tram go to Sutton, the preferred route would be to Colliers Wood, not South Wimbledon.</p> <p>On a minor point, the document should refer to Phipps Bridge, not Phillips Bridge tram stop.</p>
<b>Policies Map</b>		
	General	The status of the individual maps is unclear. It is assumed that some of the elements will be included in a definitive policies map and that others will be used to support policies in the topic and area-based chapters. The text should therefore refer directly to the relevant maps and explain the notation and status of the information presented within them.
<b>Appendices</b>		
TN10		TfL welcomes the reference to Sutton Link.

Section		Track change/comment
TN12		Existing Wimbledon to Croydon corridor—this should refer to tram stop enhancements rather than station enhancements and, as above, Phipps Bridge rather than Phillips Bridge.
TN13		Morden Road tram spur to South Wimbledon—TfL supports the inclusion of this, which is described accurately.