



THE JOHN INNES SOCIETY

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

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Dear Future Merton Team,

re: Second Consultation on Merton's Local Plan 2020.

We are broadly in support of the aims of this plan which has many worthy aspirations, but we are not convinced that some of the Policies are strong enough to achieve them. **One instance where stronger policies are needed, is to control Air Quality not just in and from new developments, but also to enforce controls to prevent smoke pollution from domestic fires and wood burners in existing properties, and to stop contamination by toxic sprays being a contributory factor to hazardous air pollution.**

We have not commented on all sections as we feel it better to concentrate on the policies and proposals which will have greatest impact on the Society's Area of Benefit which stretches from the borders of Wimbledon Town Centre in the North to the edge of Morden town centre in the South and from the Tramlink Line in the East to Wimbledon Chase and Cannon Hill Lane in the West.

We are pleased to see that many of our suggestions at the Stage 1 consultation stage have been taken on board, especially policies for environmental protection and enhancement. Merton is a leafy outer London Borough and as such, is one of London's lungs and a provider of recreational space for many non-residents. That leafy character must not be eroded. If it is, other aims, such as quality of life and healthy living, will not be attainable.

Sites

Wimbledon Town Centre Master Plan and Morden Town Centre.

In both Plans, much more high-rise development is proposed than was expected at the time of original consultations. Wimbledon Town Centre workshops expressed a desire to limit heights. Similar concerns have been stated concerning Morden.

Allowing proposals to go to ever increasing heights in order to attract developers by allowing greater density goes against the opinions garnered from public consultations, thus undermining their value. For the outcome of a Land Use Plan to be acceptable it should respect local sensitivities and not just be influenced by commercial pressures.

In the case of **Wimbledon and Merton as a whole**, there appears to be much office space already vacant. Despite what it says in the Local Plan, if you look at local commercial websites it can be seen that office and commercial premises of all sizes and types are plentifully available and some of them have been on the market for a considerable length of time. With continuing development in the City of London and proposed new development down-river from Canary Wharf there will be competition to attract tenants. High rise buildings would be speculative development that might never be economically or usefully occupied, saddling the Town Centres with over-tall building unnecessarily. We suggest putting in height limitation more in line with public opinion, but with the proviso that applications will be considered up to a stated higher figure where full occupation can be robustly demonstrated at the time of application and before building commences.

Policy EC7.3.3 mentions speculative development but, in view of the above, this should not be encouraged.

Car Parking and Encouraging Retail.

We understand that Central Government is reminding local authorities about the need to retain car parks. This reflects the reduction of retail shopping footfall due to the alternative of online shopping. The Government is worried that lack of parking could deter even more shoppers and visitors to town centres.

Our experience is that the Hartfield Road Car Park, Wimbledon Theatre Car Park and Peel House (Sainsburys) (short term) and York Close Car Parks (long term) in Morden are fully used and, if to be developed, alternative short and long term parking should be available before any existing car parks are closed.

Health uses for land in the Sites section

Policy HW2.1 (a) proposes working with NHS England, the CCG, and Health & Wellbeing Boards. The list of sites offers expansion/development of The Wilson Hospital and Morden Road Clinic & Morden Hall Medical Centre. With local hospitals and GP services already under considerable pressure from the present population more provision is likely to be needed if the number of homes is increased as proposed. The above authorities should be asked to forecast their need for new sites, apart from the Wilson and Morden provisions, before such sites become occupied by housing. Sites designated for health purposes should be safeguarded as such or otherwise protected.

Education uses for land in the Sites section

We understand that currently the recent rate of increase in need for school places has abated. Nevertheless, Housing policy 4.1.3 acknowledges the need for more family accommodation than originally envisaged. This is likely to increase the need for school places once again.

From the sites listed in the Local Plan all those mentioning possible school sites include phrases such as "unless alternative sites can be found elsewhere". This is dangerously loose as, in time, developers will pressure officers by saying alternatives must have been found by now. Sites suitable for schools should be safeguarded or otherwise formally protected.

Protection of Scattered Employment Sites Policy No Ec7.4.5 mentions the possibility of turning office space into schools. Sports facilities can presumably be found nearby, but space for children to run around at break-times could be a problem, particularly in multi-storey office blocks. This has been overcome elsewhere with entire floors being given over to recreational space.

Policy N3.3 Morden

Policy 2.3.68

We strongly support this as it promises to ensure "surrounding suburban areas ... are respected for their low density, local suburban character and green spaces" and to manage the transition between centre and suburb: "to be respectful of these sensitive edges to ensure neighbouring occupiers are not adversely affected". These are important to us.

Mo5 Morden Road Clinic –

We support the redevelopment of the site to include residential as well as healthcare uses but would prefer the provision of a healthcare facility "with similar or greater capacity" within the town centre. Either way, an NHS primary healthcare facility is essential, and a suitable site should be safeguarded from the outset.

Policies

We are pleased to see so many of our suggestions have been taken up. Our comments now are as follows:

Policy D5 Design.

D5.1 Place making and Design.

We give strong support for **a) ii, v, vii, and viii.** (design, preservation and enhancement).

We also support for **d) and f) i to vi** (tall buildings) subject to concerns about dangers of speculative development expressed above.

5.2 Urban Design and Public Realm.

We support for **d) (views) g), h), i) j)** (front garden parking).

We support D5.2 k

Public art need not be just statues and works of visual art. They could be useable or interactive, for instance an area of fountains with spouts from the pavement in the centre of an open space. An example of this can be seen at Somerset House, where the fountains alternate, and children play among them.

We also support justification 5.2.10 (against gated developments).

D5.3. All developments.

We suggest a new policy to require developers to pay for re-instatement of damage caused to pavements, verges, roads and trees in the public realm, caused by their works. It is quite wrong that public money should be spent putting right cracked and broken pavements, churned up verges, pot holes and damaged and destroyed trees.

The previous policy DM D3 is missing.

We ask for reinstatement of the policy which says developments should respect the space between buildings where it contributes to the character of the area

D5.3 xvi Garden Size.

50m² could prove inadequate and out of character for family homes. **We would like to see a policy which requires gardens to be of a size commensurate with the character of the area in which the development is taking place.**

D5.4 Alterations and extensions to existing buildings.

Some of the policies in the current Plan to protect against un-neighbourly and damaging developments are missing. New policies should be as strong as the old ones.

We suggest a new policy: remaining undeveloped garden ground should be no less than 50m² or 50% of the garden of the original dwelling, whichever is the greater.

D5.4 b). As written, we think this policy could be a hostage to fortune. Rather than the word “welcome” we suggest the word “consider”. (There is also a typo at the end of this clause.)

D5.5 Managing Heritage Assets

We give strong support for a), b, d) and f). **We query c) about loss of heritage assets.** If this policy is considered essential and needs to be retained, we feel that at the very least the expression “in exceptional circumstances” should be strengthened to read “in extreme and exceptional circumstances”.

Whereas in the current plan the Heritage Assets are listed in a schedule, in this plan it merely says a list will be maintained on the Council’s web-site. We worry this might make it easier for heritage asset status to be lost without prior consultation? **We feel the list should be in the Local Plan. The list on the web-site should include the reasons why a heritage asset is listed.**

D5.8 Shop front design and signage.

We support d) i. and justification 5.8.6. against security shutters

D5.9 Dwelling Conversions.

We support Policy a) to prevent loss of family sized homes.

Chapter 4 Housing

H4.1 Housing Choice.

We support all policies a to j.

We give strong support for i which requires affordable housing to be provided on site for schemes of 11 houses or more.

H4.2(b)

We give very strong support for b “provision of a minimum of 6,165 additional homes for the period 2020 to 2035.” Also support the Council’s reasons and for this policy and its rejection of target (1,328 homes pa) in the London Plan as being “unrealistic to achieve”.

H4.3 Housing Mix

We support the policy to provide, small, medium and larger homes in equal proportions.

H4.6 Accommodation for Gypsies and Travellers.

We support any steps to ensure adequate dedicated accommodation for Gypsies and Travellers, provided all steps are taken to make it attractive for them to use it rather than illegally entering other public or private open spaces.

H4.7 Build to Rent

We give strong Support for c) “ All affordable housing elements of the scheme must be affordable in perpetuity”. This is a policy we proposed in our submission on Stage 1 of the consultation.

Policy 6 – Infrastructure.

Strategic Policy In6.1 Social and Community Infrastructure.

We give strong support for **a to i.** (even though there is only limited evidence on the Sites Policies of where the new facilities might be located- please see comments under Sites above).

In6.2 Delivering social and community infrastructure.

We support policies **a. to d. but have reservations about d** (loss of social & Community infrastructure). The reason why a building or other form of social or community infrastructure is seen as redundant must be communicated in the local press and to local bodies such as conservation area amenity societies or residents’ associations. **The reason for the redundancy must be stated and evidence of redundancy of the site must come from more than one source.**

We support Justification In6.1.5

This proposes an Infrastructure Delivery Plan. **This needs to be in place, with necessary land-take identified, before housing developments can advance to the point where they are in the way of infrastructure developments.** Infrastructure providers such as energy, water, sewerage, communications and transport, as well as health and education and community, must be asked to state the adequacy of existing facilities to cope with increased population, and the whereabouts (strategically) of any additional land required. We welcome policy In6.1 d) which requires projected policy growth to be considered, as this is particularly relevant to infrastructure provision.

W.6.3. Waste management.

We support **a) to d).**

Policy 7 Economy.

Ec7.1 Economic Development.

We support **a), b), c) i to viii**

But we do not support c)ix We regard the concept of live/work units as sound, eliminating the need for travel between home and work.

Ec7.4 Protection of scattered employment sites.

We support **a) and b).**

Ec7.5 Local Employment opportunities

We support both **a) and c).**

Policy 7 Town Centres. *It’s confusing having two sections numbered 7. Does the plan need re-numbering from this section and onwards?*

Tc7.6 Location and scale of development in Merton’s town centres and neighbourhood parades.We support **a) and b) and we are very pleased to see our local neighbourhood parades included in the lists.**

Tc7.8 justification 7.8.7

Where necessary Art 4 Directions should be made to protect some commercial buildings from being converted to residential under Permitted Development Rights.

Tc7.9 Protecting corner and local shops

We support **a), b) and c)**.

Tc7.10 Food Drink leisure and entertainment uses.

Support **a)v, e) and f)**. **with strong support to e) as noise and smells from these uses can be a huge problem for nearby properties.**

Tc7.11 Culture Arts and tourism development.

Policy Tc7.11 a)_ We are generally in support of culture and tourism, but this policy could include one-off events such as the Music Festival in Morden Park. This is causing various problems for residents with smells and litter in Morden around the Station, where there are no public conveniences. Event organisers should be required to demonstrate to the Licensing Committee that they will provide public conveniences and adequate waste bins on site with proper removal arrangements when the site is vacated. Policy Tc7.11 c) iii needs strengthening in this respect.

Policy Tc11 a) i rightly requires event sites to have a high level of accessibility. We are therefore generally supportive of Tc11 c) iv & v. We are a little doubtful about the words "other than the private vehicle". This could discourage not just the disabled but others with mild age-related mobility problems. Retired folk are often the people with time to enjoy and support cultural events.

We would support an additional policy Tc7.11 a) iii – "The Council will encourage the provision of a new Concert venue, with high quality acoustics, to replace the previously demolished Civic Hall.

Policy 8 Environment.

We support all of this policy/chapter and particularly welcome initiatives to maintain planting in front gardens, **08.2 h**; protecting open spaces and green corridors **08.3b**; protection of trees and hedges **08.4**; Suds **F8.7 e),f), g) and k)**; **F8.8 (SuDS)**.

Support all of **P.8.9 – Air quality and minimising pollution.**

Support all of **CC8.10 – Supporting a more sustainable and resilient environment.**

Support all of **CC8.11 - Reducing Energy Use and Carbon Emissions**

Support all of **CC8.12 - Sustainable design and construction.**

Support all of **CC8.13 - Maximize Local Energy generation (including local heat networks).**

Support all of **CC8.14** adaptable development for a changing climate

Support all of **CC8.15** includes basement developments and single house replacement policies.

We reserve the right to comment further on the Open Spaces being prepared by outside consultants. So far, we have only seen an Open Spaces List, upon which we will be making representations as to content and use as requested. We would like to see designations, e.g. MOL, SINC etc. included against sites on the List as we feel this is necessary in a Land Use document such as a Local Plan.

Acknowledging the environmental and ecological value of gardens, we would like to see a new policy giving a presumption against new dwellings in back gardens.

We have only just seen the **Transport Policies**, which were missing from our hard copy of the Local Plan.

We support them in general, especially the measures for better provision for pedestrians and cyclists, **but would like to see policies which say:-**

- 1) all transport interchanges and hubs should have public toilet facilities.**
- 2) all transport interchanges should be designed to reduce the distance between transfers to make public transport more accessible to those with limited mobility**
- 3) all stations should have step free access from pavement to platform.**

In summary, we very much appreciate the work and professionalism which has gone into this Second Stage draft and hope that the suggestions we have made will improve it even further.

Yours sincerely,

Desé Child - Co-Chair.

