



THE JOHN INNES SOCIETY

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

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7th January 2018

Dear Future Merton Team,

re: Consultation on Merton's Local Plan 2020.

We are broadly in support of the aims of this plan and would like to have the following input to help achieve those aims. As we are an organization, we have grouped our comments under topics rather than go through your Questionnaire on a box by box basis. We have not commented on all sections of the Questionnaire as we feel it better to concentrate on the policies and proposals which will have greatest impact on the Society's Area of Benefit.

Sections where you have asked for a choice of three from long lists are a bad approach to consultation. Within those lists, most things are equally important.

An element common to all policies should be 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. There should be a policy to require long term maintenance of planting and trees associated with new developments and a policy to encourage tree planting throughout the Borough to aid air quality.

There should also be a policy to protect front gardens from being completely paved over, to protect not only the character of an area but also ecology and reduce flood risk. Off street parking, when permitted, should be designed to include a good proportion of planting.

We share the common concern that infrastructure provision, of all kinds from schools to drains and opportunities for de-centralized energy networks, are not being taken seriously and provision will be inadequate.

TOPIC 1 HOUSING PROVISION.

We support Merton's aim to help with the current housing shortage, but "not at any price". We regard the Mayor's target for Merton as unsustainable and unsupported by GLA future population predictions. We do not think that there should be targets, merely policies which encourage a balanced supply of new housing as suitable land becomes available. We agree with other organizations that London and the SE cannot go on expanding indefinitely to provide more homes and national policies need to encourage employers, developers and transport providers to realize how many opportunities are being missed in the regions in the rush to cram everything into the SE.

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a) Provision of sites for Affordable Housing.

In Merton Park, we HAD a good balance of a variety of housing styles to meet the needs of everyone, but too many of the smaller homes have been extended under PD rights both upwards and outwards to the point where they are only affordable by high earners. Affordable replacements are needed but they must fit in with the character of the area so that current residents find them acceptable. Blocks of tiny flats with no adequate on site amenity space or parking, or infill developments which overlook their neighbours, are not the answer but there are places where some new homes, especially smaller single storey ones, could fit in and be a useful additional to our housing stock. That is the true meaning of sustainability.

We therefore do not agree that all new housing must be at least two or three storeys and of high density.

To allow fast track planning for affordable housing merely diverts attention away from sustainability and we do not support that policy. New larger developments should contain a substantial element of genuinely affordable housing without relaxing environmental, design and living conditions standards. Once permission has been granted for a development, the obligations to provide affordable housing and infrastructure should not be negotiable.

We support publication of Viability Assessments but these require a great deal of specialist knowledge to interpret, and they must still be assessed professionally by the Council's planning team. We would not want to see this responsibility passed to the general public and permissions given on the basis of "no one made any objections".

On larger new developments, low rent affordable housing, for the lifetime of the development, not just 15 years, should be prioritized over housing to sell.

b) New home sizes:

We do not agree with targets as these, as you point out, lead to a race to the bottom. The aim should be for a balance of home sizes to meet needs.

c) Small Sites:

We suggest a small site is one of 6 units or fewer.

d) Minimum Space Standards:

We consider the existing minimum space standards are alarmingly small already. They should definitely not be reduced. People need homes where they can have a reasonable standard of living. Too many small units crammed together lead to mental health problems and social disorder. Lack of storage space and cramped kitchens discourage home cooking and healthy eating.

e) Housing and Older People.

Single storey accommodation for the elderly, other than in flats, is almost unavailable in Merton Park. A policy to encourage bungalows on suitable sites would be better than two or three storey housing, which will overlook existing homes.

Merton Park already has a good supply of semi-communal living in several Sheltered Accommodation schemes and these are popular but very restrictive on life style because they are so small and the service charges are very high.

f) Self and Custom Built and Modular Homes.

We would support a policy to encourage small units, including single storey and modular homes but they should be CIL and S106 free on smaller sites.

FINANCIAL CONTRIBUTIONS IN LIEU

This should be made illegal. If sites for affordable housing or infrastructure, whether for housing or workspace, are not available, then they probably won't be found elsewhere either.

Ideally infrastructure such as schools, nurseries and health centres, should be located within the development, to reduce unnecessary travel.

CALL FOR SITES:

It is completely unsustainable to propose new homes, affordable or otherwise, without at the same time identifying and safeguarding sites for schools, health care centres and all the other social infrastructure the increased population will require.

Where sites do become available and before they are allocated for housing, they should be considered for infrastructure.

We can suggest three sites at the moment, two of them suitable for educational purposes. All these sites are available now or within the very immediate future.

- 1) The Battle Close Virgin Active site in South Wimbledon. Freeholder – LB Merton. Very suitable for a new school.
- 2) The White Hart and motor repair workshops site on Kingston Road/Rutlish Road. This has excellent transport links, and almost direct access to playing fields at Nursery Road and the Abbey Recreation Ground, It belongs to the Rutlish Foundation Trustees, an educational foundation charity so a school would be within their aims.
- 3) 2 Church Lane. SW19 3JW. This former Doctors' Surgery has been vacant for a couple of years because it is so hemmed in by existing homes. It would make an excellent Health Care facility, possibly for specialist dental care, as that is not a service provided at the new Nelson Health Centre and patients have to travel to St. George's Hospital. Alternatively it could be added as an extension to Andridge Court Sheltered Housing next door so that the residents could share the gardens.

ECONOMY AND TOWN CENTRES SHOPPING AND THE ARTS

We are not sure Planners can really dictate what happens in town and local centres, as businesses will respond to demand. Measures to reduce access by car to shops definitely makes them less viable.

What we do lack in Merton are places where one can hold a gathering. Plenty of coffee shops but almost nowhere to hold a concert, party or even a funeral wake. A policy to encourage public halls as part of larger developments would improve Merton.

LOCAL SHOPPING PARADES:

These need to be identified and protected in the Local Plan to encourage the local economy and reduce the need for travel.

HEALTHY PLACES AND SAFE ENVIRONMENTS.

To select just three from the lists you have put forward would be saying the rest do not matter. They are all extremely important and any plan which does not require them all to be given high priority will result in an unsustainable urban jungle and a general downgrade to the environment.

A programme of succession tree planting and maintenance throughout the Borough should be introduced.

PLANNING FOR AN AGEING POPULATION AND DEMENTIA.

Everyone of all ages, including the elderly, needs safe surroundings and access to outside space, natural light and fresh air. These are basic human rights.

AIR QUALITY

It is not just traffic that causes pollution. Whether its plumes from the new Beddington waste incinerator, or dust and detritus from building developments, or the outlets from heating appliances and cooking - all these add to air quality problems. Air quality impact assessments should be required for all developments of more than 6 units. Merton Park suffers from being in a bit of a fog hollow, and as well as pollution from heavy traffic on the Kingston Road, it also suffers from smoke from fashionable open fires in many of the older houses. Smoke Control Orders are being ignored.

CONSTRUCTION POLLUTION. See above. Conditions are imposed at the moment but there are no resources or staff to enforce them. Maybe that is where a S106 contribution could be levied. Developers fund enforcement officers. The polluters should pay.

HEALTHY EATING AND ACCESS TO HEALTHY FOOD.

We don't think Local Authorities can really influence what people choose to eat. Junk food is available in every supermarket as well as in hot food take-aways. What would improve everyone's sense of well-being is the control of litter from on-the-hoof eating.

We don't really think a few salad greens or herbs grown on a balcony or roof garden will make much difference to anyone's health. You need a large garden or an allotment to provide a meaningful supply of food, and the more gardens and open spaces that get built on, the less local food can be grown.

HEALTH IMPACT ASSESSMENTS.

We agree they should apply to all developments – not just those of 100 units or more. They should also be made compulsory on all domestic extension applications as reducing a neighbour's sunshine and free flow of air can be extremely damaging to health and sense of well-being.

PLAY SPACE AND PARKS.

Merton Park is reasonably well provided for play space and parks and most gardens are large enough to allow outdoor play. We would not wish to see these facilities diminished. They are vital for health. We would wish to see all larger new developments incorporate good sized on-site open air play and recreational space, as found in cities like Paris. Garden Squares in new developments should be encouraged.

The Borough's public noticeboards, plaques and interpretation panels, especially in Parks, are being neglected and there should be a policy to maintain and improve them.

MERTON COMMUNITY INFRASTRUCTURE LEVY.

As we have said, levies in place of facilities should be made illegal. If the facility is needed, it should be provided as part of the development, preferable on-site.

TRANSPORT PROJECTS IN MERTON.

Trains: Support for Crossrail 2 should not be “at any price”. So far the scheme has offered far more economic and social damage than it might provide by way of benefits in the longer term. The example of Ealing, which has been turned from a pleasant outer London suburb into a high rise concrete jungle by the Crossrail 1 development, is one we would not regard as successful or acceptable.

We support step free access to all public transport as a priority.

The Sutton to Wimbledon Tram service seems to have crept in as a given. Surely this should be subject to consultation as the Morden Road section comes into the “not at any price” category. Much of the traffic on Morden Road is small commercial. How for instance are plumbers and decorators expected to abandon their vans and use public transport?

In general we support your other transport policies although as Merton does not deliver public transport itself this is yet another field where policies can only indicate support.

Separated Cycle lanes (which cannot be used for parking) and secure cycle storage should be incorporated in all new developments, which means buildings should be drawn back further from the highway. Many new flats are being built with windows only yards from heavy traffic. (e.g. Hartfield Road, Kingston Road Liberty House and the Emma Hamilton site flats to name but three). This is unhealthy.

PARKING FREE DEVELOPMENTS:

Any over restrictive policy denies mobility to the less able and people who need transport for their work (e.g. those plumbers and decorators). Homes only suitable for the agile childless do not result in a balanced sustainable community. Lifetime homes standards should apply to all new developments, small or large.

Yours sincerely,

Desé Child - Co-Chair.

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