

Local Plan 2020 – Consultation response from Merton Borough Liberal Democrats

Please find below the response of Merton Liberal Democrats to the 2018 consultation “Local Plan 2020 Stage 2”. All bold headings refer to the sections and Policies in the Plan, and numbers thereunder correspond with the numbered policies and/or paragraphs where relevant.

Strategic Vision and objectives

We feel the Plan lacks ambition and, in respect of Wimbledon and Raynes Park, is heavily dependent on Crossrail2 which, with the cost over-runs on Crossrail 1 and the general ‘bias’ against new London infrastructure projects, is very unlikely to be under construction by 2035.

A better ambition would be to make Merton carbon free by 2030 to have a chance to stop global temperatures rising by more than 1.5 C above historic levels. Bristol City Council recently announced this policy¹. A key way to achieve this would be by encouraging the use of electric vehicles through planning and transport policy, yet they get no mention anywhere in the Plan.

Climate change policies are mentioned but are literally right at the end of the Plan in the **Environment** section. The emphasis could be so different and the **Environment** section should follow the **Strategic Vision and objectives** section to indicate its general importance.

Dependence on Crossrail 2 – There appears to be no Plan B if this rail project is delayed – and very little mention of working with TfL/Crossrail 2 in the interim. Merton Liberal Democrats believe that the redevelopment of Morden town centre should be accelerated and prioritised. This is going to be a complex project because of Transport for London’s involvement yet there is no mention of instigating a joint venture with TfL nor the possibility that the Council would use compulsory purchase powers to secure all the site. These should be explicitly stated in the Local Plan.

The Local Plan could set out a framework for engaging the local community as active participants in the development of sites in their neighbourhood. We support a community-led approach to planning and regeneration, whether through properly supported neighbourhood planning or other types of initiatives such as “improvement areas”. Currently the role of the public in Merton seems very limited. The new Local Plan is an opportunity to change this.

2. Health & Wellbeing

Policy HW2.1 (h) states “Creating inclusive environments for all including people with disabilities and with reduced mobility by improving accessibility to local community facilities, services and shops which, encourage opportunities for social interaction and active living;”. We feel this policy needs to expressly mention transport facilities because they are crucial to enable people with disabilities and with reduced mobility to live life to the full – and it would be in line with recent policy passed by Merton Council in September on station accessibility.

3. Our places – area polices and proposed sites allocations

As a general comment, we’d question the lack of potential sites allocations for education land, given the new London Plan housing targets

Policy N3.1 Colliers Wood

¹ The London Borough of Haringey has also committed to be carbon neutral by 2050.

In **Colliers Wood (d)** and **para 3.1.11**, there is only discussion of “shop units and town centre uses” to improve the resilience of the district centre. We feel that to sustain the retail offer, non-retail business needs to be supported, and we would like to see the policy reflect this. Given the nature of the heritage assets in Colliers Wood (Merton Abbey Mills and the link with William Morris), as well as the more recent film industry based in this neighbourhood, we might expect to see aspects of the policy make provision for the creative industries.

The commitment and aim to work with Crossrail 2 in **Policy N.3.4 Raynes Park (f)** does not seem to be reflected in **para 3.1.17**, which itself seems slightly oddly placed as a discussion of the impact of Crossrail 2 on Wimbledon Town Centre sites in the Colliers Wood Policy (at least without the same/similar comments being made in **Policy N3.6**).

Policy N3.4 Raynes Park

It is not always clear in the policy whether references to ‘Raynes Park’ refers to the whole area covered by the policy (ie the Raynes Park neighbourhood – as defined, including Motspur Park/Wimbledon Chase etc) or the Raynes Park Local Centre. For example the reference to Raynes Park in **para 3.4.1** as a “relatively affluent, high quality suburban area” is a sweeping statement that does not take into account local nuances, for example the levels of child poverty identified in West Barnes ward. We appreciate that the nature of the document is high level but it should also sufficiently take into account nuances in the local areas it is addressing.

We believe the needs of the area necessitates adopting the Mayor’s proposed 50% target for truly affordable homes to ensure a sufficient supply of affordable homes for local residents and their families (as per **para 3.4.7**, Raynes Park’s share of new homes will be provided on some larger sites, meaning there is less of an issue with viability and affordable housing). We would like to see this reflected in the specific sites allocations.

With regards to **Raynes Park Local Centre (a)–(c)** and **paras 3.4.2–3.4.4**, we agree that non-retail business needs to be supported, in order to maintain the viability of the retail offer, but it would be good to know what this aspect of the policy means in practical terms. Eg **Policy N3.6 Wimbledon, para 3.6.17** recognising the changing needs of servicing and deliveries – could this be reflected here too?

What does **para 3.4.3** “resist the loss of existing employment uses” mean in practice – we would ask whether this has been currently followed in practice in areas outside of the Raynes Park Local Centre, eg recent planning application on Bushey Road, or the balance of the development in the Rainbow Estate Planning Brief.

With regards to **Raynes Park Local Centre (e)** we would like to see the policy reflect in much more concrete terms the motion passed by full Council in September 2018 on station accessibility issues, with a firm commitment to aiming to make local stations covered by this policy (Raynes Park, Motspur Park and Wimbledon Chase) fully accessible.

Raynes Park Local Centre (f) references working with Crossrail 2 and the community to ensure the benefits of investment are realised, design is sensitive to the character of the area and that disruption is kept to a minimum. We feel that more detail is needed in the policy on the potential specific impacts of Crossrail 2, which need considering now. For example, we would like to see specific assurances about the impact of more trains on the two level crossings - in Motspur Park by the shopping parade and library, and at the junction of West Barnes Lane and Burlington Road. Any

further road closures by these level crossing will be severely disruptive to local people and the plans for Crossrail 2 need to include a solution which replaces the level crossings (cf **paras 3.4.11, 3.4.12**).

Should Crossrail 2 go ahead, Raynes Park station will become a major interchange and pick up/drop off hub. The current station is in a poor state and, in particular, passenger pick up conditions are below standard for such a busy location. As part of a proposed rebuild of Raynes Park station, there must be a thorough redesign of access to the station access, drop off, as well as cycle access and parking to be developed and consulted upon. The station should be enabled to become the proud heart of the Local Centre – this policy does not seem to reflect that (see also the discussion of RP7 – the Rainbow Industrial Estate below).

We would like to see a commitment to working with Crossrail 2 on potential suitable development in advance of Crossrail 2 works – significant parts of our local centres cannot simply be left until the new railway is realised.

The ‘intensification of existing sites’ (**para 3.4.7**) referenced in the policy could also create a significant change in density in the area over time if Merton is to focus development here in order to meet the Mayor’s new housing targets. Therefore plan should be more specific about what this could mean and where possible seek to prevent overdevelopment by stealth that avoids the necessary section 106 and CIL commitments to support it.

We are concerned that Shannon Corner is being earmarked in the plan to take the brunt of both new residential and business development in the Raynes Park area (**Surrounding area of Raynes Park Local Centre (h), (i)** and **paras 3.4.9-3.4.10**). It is noted in the Policy that this area is poorly served by public transport and it is not clear that the Policy sufficiently addresses the potential changes in traffic and air pollution that significant new development will cause. The assumption that sufficient retail footfall will be lost to reduce traffic is not tested and does not take account of significant existing and new commuter traffic.

We support retaining shopping and other services around Wimbledon Chase and Motspur Park and further environmental improvements to the areas (**Surrounding area of Raynes Park Local Centre (j)** and **para 3.4.11**), we believe this should include improving the physical environment, appearance and maintenance of the public realm. We also believe that the policy should seek to strengthen these areas and improve access and circulation for pedestrians, cyclists, road traffic and public transport users. We note at **para 3.4.12** that “Transport improvements for the ... areas have already been identified”. It would be good to get clarity on what these are, as they will both influence the Policy and the consultation responses (further to our comments on the impact of Crossrail 2 on transport).

The Policy states at **para 3.4.13** that development must respect local character and amenity. We would ask that this is strengthened, and more detail provided to ensure any development reflects what would be expected of a suburban neighbourhood. This also comes back to our point in relation to the lack of local nuance in a policy that covers at least three distinct areas, potentially more (although **para 3.4.6** might be a good example of how to do that, in relation to Raynes Park Local Centre, but the other areas covered by the policy – the Apostles, Wimbledon Chase, Motspur Park, are left out). Could elements of the new National Policy Planning Framework relating to design be useful here (and **Policy D5.1 Placemaking and design**)?

RP2 – 245–247 Burlington road

Currently vacant industrial site, where the McDonald’s was rejected. The Council’s proposed usage is retail, light industrial and residential. Given the closeness to Tesco, it could be difficult to attract smaller retailers. Therefore, the site should be considered for community uses too – for example a

site for a larger Temple for the Tamil community to use. A more mixed use will help develop the sense of place and attract more footfall for potential retailers – compatible with paras 3.4.10–3.4.12.

RP3 – Burlington road, Tesco site

Noted in the document as having poor access to public transport. We believe there is significant work and investment needed to alleviate the traffic issues on Burlington road, especially to accommodate the queues at the level crossing and to develop a more accessible transport offer: including making both Motspur Park and Raynes Park stations step-free, which are the nearest railway stations (and in line with recent policy adopted by full Council on step free access and paras 3.4.10, 3.4.12). The opportunities section of the sites allocation says the PTAL is predicted to rise, but it's currently unclear how.

The proposed use is major redevelopment for housing. Given the size of the site, and given Merton's commitments under the new London Plan, it's vital that any development here maximises the number of affordable homes. It should meet Merton's target of 40% affordable housing as a minimum and seek to exceed it.

The ground floor spaces should also include opportunity for community use - perhaps gallery space, or remote working space. It could be difficult to sustain retail here since the site is owned by Tesco and is adjacent to the Tesco store itself, so a more mixed use including community use could help develop the sense of place and attract footfall.

There needs to be provision for air pollution and traffic mitigation, as well as consideration of the impact on parking in the area given the potential number of new homes. We are also very concerned about the overall potential density of the scheme that is currently proposed and the heights required to achieve that density, given this is a suburban development. The Policy states at para 3.4.13 that development must respect local character and amenity; it's unclear how the proposed use of the site might meet that policy requirement.

We believe the site would benefit from some low rise residential development in keeping with the area, accompanied by community and retail space.

We also believe the brook that runs along one side of the development should be preserved and improved to create a walk way or cycle way.

RP4 – 80-86 Bushey Road.

We feel that our comments relating to site RP3 Burlington Road, Tesco site, are largely relevant here too.

RP5 – All England lawn tennis club.

Given a recent planning application has already been approved that largely reflects/supersedes this site allocation, no comments on further use.

RP6 – former LESSA sports ground

Currently a vacant field. Bellway Homes are interested in building residential, despite a commitment as part of their planning application for the previous development to maintain the space for community/sport use.

The proposed site allocation states: "sporting or community use of the whole site will have to be demonstrated as undeliverable before any other uses can be considered".

We wholly support this being retained for sporting and community use and encourage the Council to be proactive in seeking partners to ensure it is retained as such and in holding Bellway to their original commitments on this.

For example, have the local groups like the Old Emmanuel Rugby Club been approached? If the size is sufficient, they could be approached to consider this site, for example.

RP7 – Rainbow Industrial Estate

We feel the site has been allowed to deteriorate and could currently support more employment use/jobs, and so the potential employment opportunity of the site is greater than that considered by the Rainbow Estate Planning Brief (which itself largely reflects the developer's ambitions at the time) – cf para 3.4.3. This site also will be hugely impacted by Crossrail 2, and presents an opportunity to engage with TfL now, in line with in line with *Raynes Park Local Centre (f)*. Our comments in relation to Raynes Park station above also apply.

We would like to see more detailed provision for air pollution and traffic mitigation, as well as consideration of the impact on parking in the area given the potential number of new homes. We are also very concerned about the overall potential density of the scheme that is currently proposed and the heights required to achieve that density, given this is a suburban development. It's unclear how the Planning Brief is currently consistent with either paras 3.4.6, or 3.4.13 that development must respect local character and amenity.

RP8 – West Barnes Library

We believe that the West Barnes Library should be safeguarded in the plan as a vital community resource.

It is due significant investment for improvements and we believe this is an opportunity for the Council to engage with Crossrail 2 now, so we do not have to wait another 10/20 years for investment and refurbishment of the library – in line with *Raynes Park Local Centre (f)*.

RP9 – Whatley Avenue

The site allocation notes that the proposed use is residential once it has been declared surplus to educational needs. Is such development compatible with Joseph Hood Primary School, given the close proximity. Given the lessons from the Sites and Policies Plan 2011 and the substantial expansion of the primary schools from 2012 onwards, is it wise to rush to allocate this site away from educational use.

Policy N3.5 South Wimbledon

The boundary of the Local Centre should extend further east to the junction with Haydons Road on both sides of Merton High Street. This should ensure that the High Path development provides an attractive frontage to compliment the shops opposite; see also our comments in relation to Site allocation Wi8 and **Policy N3.6 Surrounding neighbourhoods of Wimbledon (l)–(p)** below.

Policy N3.6 Wimbledon

Building heights are hugely controversial, and the most contentious element of the draft Wimbledon Masterplan (that ultimately will need to be supported by the Local Plan). **Wimbledon Town Centre (c), (d)** refer to “midrise contextual architecture” and “taller buildings” – and **para 3.6.2** reflects these in the “emerging priorities” evident in the consultation responses to the Local Plan and **para 3.6.8** refers to “dense mid-rise urban blocks”. We feel there needs to be an explicit discussion about

the maximum heights, and also wonder if elements of the new National Policy Planning Framework relating to design (and the language used there) as well as **Policy D5.1 Placemaking and design** be a useful tool in developing the policy here? Heights of up to 18 storeys referred to in the Masterplan are not what most would consider mid-rise contextual architecture.

With regards to **Wimbledon Town Centre (e)** and **paras 3.6.5, 3.6.15–3.6.17**, we would like to see the policy specifically reference developing a cultural and creative “quarter” (and would like to see this reflected in the relevant sites allocations and policy). Along the Broadway we already have leisure facilities which attract people to visit the town – the shops, bars and pubs and cinemas together with the Polka Theatre with its very strong reputation, and the Wimbledon Theatre, plus the potential for a new concert hall. Additionally, we see small and new business as a positive agent of change: contributing fresh ideas and social solutions that drive us all forward, and so would like to see a focus on start-ups and on the creative industries (which have a history in Merton). We would like to see this reflected in **paras 3.6.15–3.6.17**. We particularly support the element of **para 3.6.17** recognising the changing needs of servicing and deliveries.

We feel that the current draft Masterplan is incompatible with **Wimbledon Town Centre (g)** in that the former envisages purely business/office development in the town centre area, whereas **Wimbledon Town Centre (g)** establishes that the vibrant daytime, evening and night time economy is promoted through a mix of uses. There is a huge shortage of (affordable) housing in London and we believe that there is opportunity (particularly with new development above the railway lines) to provide residential accommodation in Wimbledon Town Centre. We would like to see this reflected in the sites allocations (see for example, our comments on Wi1 Battle Close below).

However, the impact of Crossrail 2 looms over the policies in their impact on Wimbledon and Raynes Park neighbourhoods (see eg **para 3.6.13**). The concession/explanation in **N3.1 Colliers Wood, para 3.1.11**, seems to give up on potential housing development opportunities in Wimbledon town centre, without even the commitment of **Policy N3.4 Raynes Park Local Centre (f)**. With so much in the neighbourhood policies and sites allocation predicated on a positive Government decision on Crossrail 2, we feel that these elements of the Local Plan will likely need to be reviewed should a decision not to proceed be taken, we also would like to see a stronger commitment to working with Crossrail 2 in advance of the works given the timescales involved. **Wimbledon Town Centre (k)** seems a little odd in this regard (focused solely on Wimbledon Station, without indicating whether it means seeking improvements pre-Crossrail 2, or only if Crossrail 2 goes ahead), and we feel that there should at least be a policy similar to **N3.4 Raynes Park Local Centre (f)** in relation to Wimbledon Town Centre and that this aspiration should be reflected in **para 3.6.13**). We would like to see a commitment to working with Crossrail 2 on potential suitable development in advance of Crossrail 2 works – significant parts of Wimbledon cannot simply be left until the new railway is realised.

We support the commitment to working to ensure that the solution for Crossrail 2 is the best for both Wimbledon and Crossrail 2 and feel that this could be done not just by working with local partners suggested in **para 3.6.13**, but by looking to use independent advice and international expertise. We would like to see an independent review panel established made up of representatives from residents’ groups, businesses, Merton Council and TfL, advised by international transport consultants. Merton Council needs strong, clear and appropriate planning policies and vision in place to guide and manage the significant development that is going to follow this major scheme. Issues that need to be considered include: the impacts of Crossrail 2, height and density of new buildings, the balance between commercial and residential, open space, affordable housing and support for smaller businesses.

When considering ***Surrounding neighbourhoods of Wimbledon (l)–(p)***, we feel it's disappointing that little distinct thought seems to have been given to areas like South Wimbledon or Merton Park (area round the Nelson Health Care Centre) as part of **Policy N3.6 *Surrounding neighbourhoods of Wimbledon*** – if online to ensure consistency with **Policy N3.5 *South Wimbledon*** (which we support as an idea). We would like to see site allocation Wi8 as part of a larger plan for South Wimbledon, rather than a tack on to the Wimbledon Policy.

Wi1 – Battle Close

We agree there is scope for residential here subject to caveats regarding possible contamination and protecting amenity of neighbouring properties. We would like to see a commitment to investigate whether the site might be assigned to a community land trust to begin to address the chronic shortage of affordable housing in Wimbledon.

Wi2 – Theatre car park

As noted, servicing of the site causes potential issues for residents on Russell Road. Presents opportunities as part of a Wimbledon Town Centre “cultural quarter”.

Wi4 – 27–39 Hartfield Road

We note a planning application has recently gone in for this site. We think the major issue on this site is actually protecting the amenity of residents on Hartfield Crescent, given the impact on traffic etc caused by service vehicles (servicing having little option but to take place via Beulah Road).

Wi5 – Hartfield Road car park

Agree that there is some scope for residential here, given the mix of Hartfield Road. Agree that mitigating traffic and parking impacts on neighbouring streets is key here and the cumulative impact of loss of town centre parking, as well as the impact on the amenity of Ashbourne Terrace, and nearby properties on Hartfield Road.

Wi8 – South Wimbledon Station

We would like to see Wi8 as part of a larger plan for South Wimbledon, and would hope to see this site allocation as complementing the area policy, as noted above.

Wi9 – St George's Road

The basis for the claim that the “net loss of the [community centre] facility has not resulted”. It's incredibly difficult to rent community space in Wimbledon Town Centre.

Wi10 – Prospect House

Unclear why it's proposed that this site be allocated a much narrower mix of uses than eg Wi9? Especially given the suggested co-ordinated development with the other sites. This seems unduly restrictive.

Wi15 – YMCA site

The YMCA plays an important role in Wimbledon providing a considerable amount of affordable short term accommodation and a range of sporting and leisure facilities used by a broad cross section of the community. The site is also clearly in need of redevelopment but any proposal that includes an increase in the height of the building (particularly as high as that currently envisaged in the Masterplan) will be extremely controversial and clearly effect the amenity of residential areas both within and outside the South Park Conservation area. We are concerned therefore that the sole comment listed under 'Issues' is to "consider the amenity of neighbouring residential uses". This is markedly, and one suspects deliberately, less positive than the commitment to "protect the amenity

of adjacent residential occupiers" included under Wi1 – Battles Close where, ironically, there is not the same degree of community concern re future development.

4. Housing

Merton Liberal Democrats support the need to build more homes in the borough to increase access to affordable housing of all tenures. We want to see the maximum number of affordable homes created as possible, a clear overall target of 50% affordable units in large developments and a specific commitment to increase the number of homes at social rent levels (cf **Policy H4.1 Housing Choice (e) and (f)**). We are not convinced that a relaxing of the target of affordable housing in large developments to 35% is compatible with meeting the aim of 50% affordable built 2020–2035.

We recognise there will need to be some variation in affordability requirements for smaller sites. But we feel that small site developments should continue to provide affordable homes where possible. We believe that guidance for smaller sites is useful but that it should be for the Planning Applications Committee to consider applications individually and seek to maximise affordable units in each development. Over 90% of the planning applications Merton receives for new homes are for sites providing less than 10 homes – as such it should be for the developer to show that a site is not suitable for affordable housing (**Policy H4.1 Housing Choice (g)** and **para 4.1.14**).

We do believe that the proportion of 20% for sites of 2-10 units to be taken as a financial contribution is too low and should be increased (**Policy H4.1 Housing Choice (f)**).

We also believe that if the Council cannot meet a 50% affordable target through the existing plan they should increase efforts to work with TfL, the Mayor and other public bodies to release more public land for development.

The Plan makes no mention of 'Right to Buy' or the proposed voluntary right to buy for housing associations at **paragraph 4.1.16**. We feel there could be reference to Community Land Trusts as a way to ensure affordable homes remain as such as mentioned in that paragraph.

At **para 4.1.19**, the Plan highlights that the basis for calculating the affordable proportions of a site is unduly complex. Merton's policy needs to reflect the latest guidance from MHCLG on viability to ensure that the maximum number of affordable units is delivered.

The Council's requirement to provide housing by the Mayor has been increased from 411 dwellings /pa to 1328/pa – a 223% increase (**Policy H4.2 Housing provision (b)** and **paras 4.2.12–4.2.13**). The need for this is questioned, as population projections have been quite variable. There also remain questions about how deliverable these numbers are in practical terms, particularly given significant skills shortages in the home building industry.

We welcome the support for 'Build-to-Rent' (**Policy H4.3 Housing mix** and **paragraph 4.3.4 and Policy H4.7 Build to rent**). Such schemes will be difficult to deliver in Merton because they are likely to be of around 100 units, but they can provide important competition for private landlords and should drive up management standards, as well as accelerate the supply of homes.

We note that Merton has a poor record of enforcement when it comes to problem landlords – we would like to see the development of a local renters' charter outlining landlords' and tenants' rights and responsibilities, the support the Council can provide, and details of how to access it. We believe Merton should investigate the setting up of a licensing scheme for private rented accommodation.

Policy H4.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system lays out the criteria for providing supported care housing, including sheltered and extra care housing.

It is worth noting that there appears to be an inaccuracy in **para 4.4.2** (or else it is oddly drafted) so that the seemingly proposed definition of vulnerable people covered by supported housing is included with the list of what Policy H4.4 “does not relate to”. If taken as read this would mean no vulnerable groups would be covered by the policy. Though for the purposes of our response we will assume this is not the case.

We are disappointed that the plan does not make clear any efforts to promote the building of supported housing, despite a key part of the Council's current saving proposals (CH90), which looks to reduce reliance on out of borough placements for mental health in particular.

Nor is there any reference to the review of learning disability accommodation in proposal CH91, the result of which could impact the need for more in borough learning disability accommodation. CH91 also explicitly states that the Council believes registered providers are keen to develop supported housing in Merton.

Currently there are an extremely high number of out of borough placements, over 70% in residential mental health, which is both bad for the council's budget but more importantly potentially requires vulnerable people coming into the system in Merton to be separated from their families and support networks.

If expanding in borough placements were to be a serious proposition we would expect this to be emphasised across the local plan and to be made more explicit in the local site allocations.

It would also be beneficial to expand further on **para 4.4.4**, which suggests that “Generally, supported care housing will be located within easy access to shopping facilities and services in locations with good access to public transport, or with adequate on-site facilities.” Since in theory large parts of the borough could be therefore be considered inaccessible - with a lack of step free access at most rail and tube stations in the borough.

Speeding up proposals to bring step free access to more stations in Merton could therefore also expand the scope of areas eligible for supported housing within the policy.

5. Design

This is a very important section because getting ‘good design’ and avoiding ‘bad’ is crucial to enhancing Merton.

In **para 5.1.8**, we recommend the sentence that states “Where development clearly and sufficiently accords with relevant development plan design policies, design will not be used as a reason for refusal.” is deleted. We believe it is unnecessary statement, and could be unhelpful to the Council in its development control responsibilities. We feel it is inconsistent with the general thrust of **Policy D5.1 Placemaking and design**, which puts the onus on the developer (although we do feel that that Policy would be strengthened by more specific reference to the provisions of the new NPPF relating to design).

We generally support **Policy D5.10 Basements and subterranean developments**. However, we do not support **para 5.10.4**, which is illiberal. Citizens should be able to enhance their dwellings as long

as the extension does not adversely affect neighbours and the immediate environment (as the policy prescribes). The same comment about values could be made about loft extensions. We would delete **para 5.10.4**.

There is no mention in the Plan for designs to allow for modern refuse bins which become very unsightly for small dwellings. This needs to be rectified urgently especially for residential conversions.

There is also nothing on the conversion of shops to residential. This is an important omission because the decline in demand for retail space is a secular, not a cyclical, trend which is likely to persist through much of the plan period. While some conversions will take place through Permitted Development rights under the General Development Order, there is a great need to promote good practice given the very poor experience to date.

6. Infrastructure

We note that **Policy In6.1 Social and community infrastructure** refers to the projected population growth, and yet that none of the sites allocations seemingly make provision for potential new educational land.

(Furthermore, we would like to see CIL used strategically to support existing infrastructure, eg a “nearby schools bonus” to spend on refurbishing local schools that have experienced strains to their refurbishment budgets recently).

In **Policy In6.1 Social and community infrastructure (b), (f)** we would like to see a commitment from the Council to supporting the return of “walk-in” GP services to the borough. This is to reflect the need referred to in the policy to reduce health inequalities as it is still hugely unclear whether and how the closure of walk-in services has impacted people from more vulnerable groups – homeless people, refugees or those with chronic mental health problems.

We believe that a walk in service is still needed for more vulnerable groups in the borough and this is currently not being provided for outside of our local hospitals.

As such, we would amend (f) to read: “Support the aims to improve access to primary care facilities, which could extend GP surgery hours, reintroduce a 7 day a week GP walk-in service to Merton and support the re-use of social infrastructure and the relocation of service wherever possible;”

We note that the Council is currently undertaking a review of social and community infrastructure needs throughout the borough (**para 6.2.4**).

6.4 Transport

With regards to **Policy T6.4 Supporting an inclusive and better connected transport network (c)**, we would like to see a commitment to work with TfL and rail companies to improve the accessibility of stations.

In terms of **Policy T6.4 Supporting an inclusive and better connected transport network (f)**, We have long supported a default 20mph speed limit on residential roads (ie so a road can still be “opted out” of the lower speed limit). This would reduce overall speeds, and thereby reduce air pollution (by smoothing the flow of traffic) and risk of injury from accidents. The current piecemeal “opt in” approach to 20mph speed limits with or without calming measures, is confusing for drivers and expensive for the local authority.

We think more emphasis should be placed on street design to encourage cycling and walking and to discourage rat running – rather than the proposal to limit access to streets, which will only increase congestion (**Policy T6.5 Sustainable and active travel (a)**).

We think the need across Merton is for a clearer set of comprehensive ‘strategic’ cycling routes. These should be identified by the community as well as experts in cycling design, and the feasibility of implementing safe (pedestrian/cycle) facilities. These routes should be offered as much protection as practical to cyclists, as well as other pedestrians (cf **Policy T6.5 Sustainable and active travel (d)**). Cycle lanes “broken” by parking, such as that along Kingston Road towards Raynes Park, should either be completed, or removed. In their present state they discourage cyclists from using them.

Whilst we support the aim of **para 6.8.7**, we’re slightly surprised to see no mention of Crossrail 2 – or indeed ideas about how to improve pedestrian access at Lower Downs Road whilst we wait for Crossrail 2 development, or not.

7. Economy & Town Centres

We see small and new business as a positive agent of change: contributing fresh ideas and social solutions that drive us all forward, and so would like to see a focus on start-ups and on the creative industries (which have a history in Merton), including a framework for supporting such business in planning terms as ideas develop and practice changes (cf **Policy Ec7.1 Economic Development (a)** and **para 7.7.1**).

Policy Ec7.1 Economic Development (c) (ix) states ‘Not support live/work developments’ yet there is no justification for this policy. It appears to reflect a general opposition to new ideas and should be deleted. Given the urgent need to increase housing supply all options should be available. A specific policy in respect of Live/Work developments is necessary to ensure that the residential and employment floorspace initially approved is controlled thereafter.

Policy Tc7.7 Protection of shopping facilities within designated shopping frontages is going to be challenging to enact given the sharp decline in demand for retail floorspace nationally as a result of the growth of online, which continues to expand its market share. The need is to manage the contraction of high streets so that they can retain an attractive core. It is important therefore that protected frontages are not defined too widely so that their overall vitality is reduced. At the fringes, vacant units should be converted to B2/B10 use or residential if there is no commercial demand. Moreover, the insistence on a long period of vacancy to prove a lack of demand can have its own negative impacts on a neighbourhood. The appropriateness of this policy needs to be monitored especially carefully.

With regards to **Para 7.7.1**, we believe that non-retail business in an area needs to be supported in order to help maintain the viability of the retail offer.