

Local Plan 2020 – Consultation response from Merton Borough Liberal Democrats.

Please find below the response of Merton Liberal Democrats to the 2017 consultation “Local Plan 2020”.

All bold headings refer to the consultation headings, and numbers thereunder correspond with the numbered questions where relevant. In addition, further comments have been included.

General comment

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 development of the new local plan is an opportunity to change this.

Affordable Housing

The provision of more affordable homes is a key policy priority for Merton Liberal Democrats.

We don’t believe the Council is currently doing enough to ensure that sufficient affordable housing is being built in Merton. We have regularly raised concerns about planning applications being able to avoid the 40% affordable housing target owing to “viability issues”.

The said viability issues largely relate to the value of the land which has reportedly decreased since purchase. However, the conditions placed to review the viability of affordable housing on the site, just prior to development, or immediately after development, would still allow a site owner willing/able to sit on the development (after building) until the land value is more favourable, to sell on the site, minus an element of affordable housing.

The failure to meet the 40% target of affordable housing in new developments is likely to have had a serious adverse impact on the chances of prospective homebuyers, particularly those with lower paying jobs, and younger people, being able to afford to get onto the housing ladder in Merton.

In respect of the specific number questions on this topic in the Consultation document, we make the following points:

1. We are in favour of the fast-track route being adopted in the Local Plan. The most pertinent point is that Merton Council actually seek to achieve these rates of affordable housing.
2. Given the Council’s failure over the few years to meet relevant affordable housing targets, therefore we are in favour of an approach that maximises the number of affordable homes built in the borough. We would therefore only “count” affordable homes as actual homes, and not “habitable rooms”.
3. We agree that all viability assessments should be published. We feel the Local Plan should go further, and require past viability assessments to be available too, to ensure that there is full accountability for decisions taken on these assessments.
4. We feel that small site developments should continue to provide affordable homes. 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. Any consultation on this point should include evidence on the thresholds, so that respondents can provide informed views.

5. The consultation question is flawed: the question asked is not a “yes/no” question, and yet they are the options given. In our opinion, student accommodation should be required to include affordable housing and/or a contribution to affordable housing should be made by developers in the alternative.

In addition to the above, the Local Plan should include a clear commitment that Merton’s local housing company must at least meet the required affordable housing targets (unlike its current plans). We would go further, and require that 50% of the housing it builds each year must be affordable housing.

Diversifying the housing market

1. We agree that the local plan should encourage more semi-communal living, to make it a viable choice for older people (or indeed others) that want it.
5. We agree that “build to rent” could help accelerate the supply of homes as there is clearly a growing demand for privately rented accommodation. 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.
10. We support modular housing, but such should largely be used for those in urgent need until more permanent solutions can be found.

Colliers Wood and South Wimbledon/Mitcham/Morden/Raynes Park/Wimbledon

The purpose of this particular set of questions is unclear – we are unsure why anyone would tick “no” to any of the suggested actions at 1 and 2. What information do you hope to get out of these questions?

We would make the following general point, the public have significant concerns about the density of new developments, policy on this is hugely important: we would like to see stronger and more detailed provision made in relation to requiring developments to “relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings”.

With regards to **Raynes Park** specifically, we make the following additional comments (and see also our comments under Transport and Movement, on Crossrail 2):

- We feel the local plan should commit the Council to improving the accessibility of local stations.

With regards to **Wimbledon** specifically, we make the following additional comments (and see also our comments under Transport and Movement, on Crossrail 2):

- We feel that the local plan should commit the Council to working with the Met to provide a local police base and public counter (see also our comments under Neighbourhood Community Infrastructure Levy).

Neighbourhood Community Infrastructure Levy

We have a number of ideas around how funding could be allocated on an ongoing/rolling basis:

- a “nearby schools bonus” to spend on refurbishing local schools that have experienced strains to their refurbishment budgets recently;
- securing a fixed term rent on a disused shop/office to use as a Wimbledon “super hub”, with public access, for Merton’s police services.
- a supplementary litter cleaning service for town and district centre areas of the borough. New development will increase footfall and therefore litter.
- a step-free fund to part fund accessibility improvements to local stations.

These would address the demands placed on the borough by development, and would meet a number of the objectives outlined in Merton’s Community Plan.

In addition, funding could be used on a number of problem junctions in the borough that would meet the “Keep Merton Moving” objective, for example:

- To improve traffic flow at the junction of Hartfield Road/Kingston Road by the Merton Park Tram-stop – following the increase in trams, there has been a significant increase in stationary traffic along Kingston Road, which has knock-on effects for traffic flow elsewhere (both “rat-run” usage along roads like Wilton Crescent and higher density traffic further up Kingston Road nearer to Raynes Park) and also to air pollution along these roads.
- A mini-roundabout at the junctions of Kingston, Lower Downs and Burstow Roads.

Economy and Town Centres

We believe a way of tying Merton’s history to its future is to support the creative economy locally; we would like to see this as a reoccurring theme in the local plan.

1. Wimbledon town centre (which this part of the consultation focuses on) is currently lacking in diversity and interest in terms of shops and businesses. The businesses that survive are mostly chains.
3. We feel the local plan should wholeheartedly support a Wimbledon concert hall.
4. Yes, but it’s not just property being available at cheap rent – what other facilities, resources and businesses and services are needed? Furthermore, what do flexible workers need and want?
7. Yes, if the alternative is not to require anything to be done about the loss of small business space.

Healthy Places

1. All these things are important, but they are more or less of a priority depending on the area, and over time as an area changes.
3. We feel that the local plan should commit the Council to working with the Met to provide a local police base and public counter in Wimbledon (in addition to the one in Mitcham).
4. Why would anyone object to this?
5. All
6. Yes.

8. Whilst we would support proposals to restrict an over-concentration of hot food take-away (A5 uses) in a given area, and specifically near secondary schools, we're not sure why the two bullet points are supporting evidence for a more restrictive policy – given they relate to respectively the divide between east and west of the borough (without any suggestion that the difference in number of A5 use premises is the reason) and obesity in primary schools (where it's pointed out that the policy will not apply to primary schools because they're not allowed off the premises at lunchtimes). We are concerned that this policy would be used as an excuse not to take other action to reduce childhood obesity. In order to remain viable, we believe suitable areas should contain a mix of food and drink uses, as well as other commercial uses.
9. See above.

Housing Growth and Infrastructure

In general terms we note that no specific mention has (yet) been made of any land needed for an increase in school places. The local plan should consider requirements for new schools.

1. It is very difficult to respond to the propositions referred to at Question 1 of this section - the circumstances for any particular site may vary, as may any development, and meaningful input into this section requires reference to specific sites. For example, what are "tall buildings" (height of buildings being a significant concern for residents)?
3. It seems difficult if not impossible to suggest priorities for new infrastructure without reference to a specific area. And also such changes over time, for example, school and GP provision depends on population change, which can be impacted by significant development. Such should respond to the area and the evidence.

Travel and Movement

5, 12, 13. 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. The question regarding use of the kerbside does not include street redesign. Greater priority could be given to cyclists – eg 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.

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.

7. A number of railway stations in the local area are not (or not fully) accessible to wheelchair users, people with mobility issues or parents etc with prams.

14. Additional comments

Cycling: 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.

Crossrail 2: We feel that the local plan should fully consider the impacts of Crossrail 2 on the area, especially Wimbledon and Raynes Park. It is a number of years away and is currently in an early consultation phase, development of the local plan is therefore a good opportunity to impact on the proposals.

In summary, our view is:

- **This is a major, long-lasting and enormously expensive scheme and it should only be delivered in a way that responds to the community's needs and concerns** – the development of the local plan is part of the way to identify such.
- **We support an alternative deep tunnel under Wimbledon that would avoid the widespread demolition of the town centre currently proposed.** This is our preferred alternative to the shallow tunnel, all else being equal, and we need to understand exactly what is currently preventing it from being proposed and how these issues could be dealt with. This would impact on the local plan.
- **The new Wimbledon station should be subject to an architectural competition.**
- **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.
- **Existing stations must not be left in a state of disrepair - as this scheme will take years to complete.** Specific concerns include installing a lift/step free access at Raynes Park and Motspur Park stations, as well as congestion management at Wimbledon station.
- **We need specific assurances about the impact of more trains on the two level crossings in West Barnes ward** - 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.
- **Raynes Park station will become a major interchange and pick up/ drop off hub.** As part of a proposed rebuild of Raynes Park station, we call for a thorough redesign of access to the station access, drop off, as well as cycle access and parking to be developed, consulted upon and published. The station should be enabled to become the proud heart of the community.