

Merton Liberal Democrats are pleased to be afforded the opportunity to respond to the consultation for the “Merton Local Plan 2020 Stage 2a”.

Merton Liberal Democrats thank the officers of the Council who have worked tremendously hard by producing this draft Local Plan, considering the difficulties met by the current pandemic and against a backdrop of increasing government hostility to the role played by local authorities in the planning process. Central to our submission is a belief in the community's critical role in planning decisions which is why we support the council's current approach to recent changes regarding permitted development rights. Government reforms, including those that allow developers to add up to two extra storeys to purpose-built flats without planning permission, pay scant regard to the views of residents and Merton Council must continue to do all it can to include the community's input in such decisions.

We would like to make some general comments regarding the plan.

- **For the long term.** The Merton Local Plan is of long-term strategic importance for the borough that will shape development for at least a decade. We feel overall the document lacks ambition and is too incremental in its approach rather than setting a strategic view of Merton for the mid-2030s.
- **Climate Emergency.** The climate emergency is just that, an emergency. It is not clear that the draft Local Plan truly drives forward on Merton's Net Zero commitments.
- **Merton post pandemic.** Trends that were forecast to realise over the next 10-20 years have been greatly accelerated due to the pandemic. Working from home, the growth of online retail and the coming together of local communities are all trends which are more likely than not to be part of our lives going forward. The local plan should embrace these changes and plan accordingly.

Our response below aligns to the online survey format as far as has been possible.

3. Urban Development Objectives and Good Growth Strategy

2. Do you have any additional comments on the 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 policy. 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.

4. Neighbourhoods

3. Colliers Wood: Policy N3.1

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. We are pleased to see some recognition of this in 3.1.21, but it seems an afterthought.

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 3.1.16, 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).

We feel that there should be more clarity provided in 3.1.18 as to appropriate heights, we are concerned that Britannia Point is considered the benchmark. Without this further detail, 3.1.18 seems inconsistent with 3.1.19-3.1.20.

5. Mitcham: Policy N3.2

Whilst we support a stronger Mitcham town centre as envisaged in N3.2. Mitcham (a)–(f), we feel that it is very limiting to only focus on economic considerations (except perhaps a small reference to a “wealth of historic assets” in para 1.2.13.

Turning to the detail of the policy, we would suggest that (a) is achieved by the policies set out in the subsequent paras. We would like to see more detail, in a planning context, of what (e) and (f) look like in practice.

We support the ideas behind para 1.2.6 but would like to see some acknowledgement of the changes in the way we shop and access services and how they are relevant to the local plan, e.g. perhaps as are reflected in N3. 4 Raynes Park para 3.4.6.

Para 1.2.8 does not consider other sustainable transport improvements, such as bus routes.

We are pleased to see a recognition in para 1.2.11 that increases in housing need additional educational and health services to support growth. This recognition was missing from the current Sites and Policies Plan.

7. Morden: Policy N3.3

Merton Liberal Democrats welcome the intention expressed in the proposals to rejuvenate Morden Town Centre as expressed in N3.3.

We welcome the comprehensive ambition as set out in (b) however we would like to see a stronger commitment to employment opportunities in Morden as well as a strengthened commitment to truly affordable housing in significant volumes in the proposed housing.

Air quality in Morden has long been a concern and moves not only to relocate the bus stands (b) are welcome but need to be accompanied with measures to tackle traffic flow and volumes. Morden's gyratory road system is both a symptom and a cause of many of the town's issues and should be replaced with an emphasis on prioritising pedestrians, and cyclists.

We welcome in (f) the commitment to ensure any tall buildings in Morden will only be built in the context of a comprehensive townscape appraisal. Merton Liberal Democrats would only welcome proportionate and contextual building heights in the Morden Regeneration Zone. Plans for taller buildings should also consider the views of local residents.

Merton Liberal Democrats are concerned about the lack of consideration given to the wider Morden Neighbourhood. There is a lack of acknowledgement, let alone detail on how the areas of Cannon Hill, Lower Morden and St Helier can be enhanced and connected more to the regeneration plans of Morden Town Centre. There are for example, no proposals regarding active travel and green corridors linking these communities to each other and the Morden regeneration zone.

9. Raynes Park: Policy N3.4

It is not always clear in the policy whether references to 'Raynes Park' refers to the whole area covered by the policy (i.e. 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 3.4.2–3.4.6, we agree that non-retail business needs to be supported, in order to maintain the viability of the retail offer. We support the further detail added to these paras to particularise the practical steps that will be taken. With regards to para 3.4.3 "resist the loss of existing employment uses", we would ask whether this has been currently followed in practice in areas outside of the Raynes Park Local Centre, e.g. 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) and Surrounding area of Raynes Park Local Centre (i), the policy reflects 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 all local stations covered by this policy (Raynes Park, Motspur Park and Wimbledon Chase) fully accessible. Given both the funding needs for this, and the relatively high level of development in the area, we might

hope to see commitments to strategic or neighbourhood CIL being used and it would be good to see that detail here.

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 support the specific commitments 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 3.4.14).

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 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)– (i) and paras 3.4.11, 3.4.12), we are pleased to see the policy include improving the physical environment, appearance and maintenance of the public realm. 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 3.4.5 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 commercial, business, service and community use appropriate to a residential area. Given the closeness to Tesco, it could be difficult to attract smaller retailers. We support that since the last consultation the site could 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.

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.

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.

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.

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.

11. South Wimbledon: Policy N3.5

We welcome the extension of the boundary of the Local Centre 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.

13. Wimbledon: Policy N3.6

Building heights are hugely controversial, and the most contentious element of the Future Wimbledon SPD (that ultimately will need to be supported by the Local Plan, and as such the Local Plan must be consistent with the already adopted SPD). As such, we would expect to see Policy N3.6 and para 3.6.7 set out guidance on heights consistent with those in the SPD.

With regards to Wimbledon Town Centre (a), (b), (g) and paras 3.6.18, we would like to see the policy specifically reference developing a cultural and creative “quarter” in Wimbledon (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 3.6.15–3.6.22. We particularly support the element of para 3.6.17 recognising the changing needs of servicing and deliveries, and 3.6.18 setting out how this might be particularised in planning terms.

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).

We feel that the discussion of the “surrounding neighbourhoods” is largely descriptive and would be strengthened by a focus on the policy support each area needs by e.g. setting out of some of the practical requirements to support businesses specified in para 3.6.18, or in the case of Haydon’s Road, support for shopfront, public realm and street scene improvements that are specified in relation to Motspur Park and Wimbledon Chase.

Whilst the aim of para 3.6.28 to “[focus] town centre activity within its boundaries” and para 3.6.29 is laudable, as the recent development of 27–39 Hartfield Road shows, it is difficult to see how this policy proposal would work in practice. Some of this could be improved by full discussion of construction plans during the planning application stage, rather than by condition agreed by the Council afterwards.

14. Do you have any additional comments on Policy N3.6?

The impact of Crossrail 2 looms over the policies in their impact on Wimbledon and Raynes Park neighbourhoods (see e.g. para 3.6.12 et seq). The concession/explanation in N3.1 Colliers Wood, para 3.1.16 (and para 3.6.14), seems to give up on potential housing development opportunities in Wimbledon town centre.

We support the recognition in para 3.6.13 that “it is likely that Crossrail 2 will not be completed much prior to 2040, outside the lifetime of this Local Plan”. However, 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.

Wimbledon Town Centre (J) focuses on Wimbledon Station, without indicating whether it means seeking improvements pre-Crossrail 2, or only if Crossrail 2 goes ahead.

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.

Sites allocations

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

The servicing of the site causes potential issues for nearby residential roads. Presents opportunities as part of a Wimbledon Town Centre "cultural quarter" as discussed above.

Wi5 – Hartfield Road car park

Agree that there is some scope for residential here, given the mix of Hartfield Road. 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 and Gladstone 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.

Wi9 – St George's Road

The site allocation no longer claims that the "net loss of the [community centre] facility has not resulted". However, it remains 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 e.g. Wi9, Wi13? Especially given the suggested co-ordinated development with the other sites. This seems unduly restrictive.

Wi11 – Victoria Crescent

Feel that there is some scope for residential here too, given the mix of Hartfield Road. Mitigating traffic and parking impacts on neighbouring streets is key here, as well as the impact on the amenity of Ashbourne Terrace, and nearby properties on Hartfield Road, Hartfield Crescent, Graham Road, and Herbert Road.

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. We note planning permission has recently been granted.

Wi16 – Centre Court Shopping Centre

We note that para 3.6.16 envisages the Centre Court shopping centre as part of the “retail core” of Wimbledon town centre. Agree that any development must be sensitive, protect and enhance the listed building frontages on the site and improve their setting. We note the marketing literature for the site showed blocks of 20-25 storeys tall, which would not be consistent with the recently adopted SPD.

5. Housing Provision

15. Housing choice: H4.1

15. Do you agree that this policy ensures existing and future residents have a choice of different types, sizes and costs of homes?

Merton Liberal Democrats support the need to build more homes in the borough to increase access to affordable housing of all tenures.

Specifically, 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 pleased that the Local Plan no longer contains a relaxation of the target of affordable housing in large developments to 35%, although we are concerned that meeting the aim of 50% affordable built 2020–2035 will be difficult if large developments are only held to a minimum provision of 40%.

We recognise there will need to be some variation in affordability requirements for smaller sites. For the reasons set out in para 4.2.1 we feel that small site developments should continue to provide affordable homes where possible, and not just by financial contribution. We recognise the issue set out in para 4.1.22, but management by registered providers isn't the only tenure available for affordable housing.

Between 85-95% of the planning applications Merton receives for new homes are for sites providing fewer 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 (f)). 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.

We believe that a financial contribution of “up to an equivalent of 20%” for sites of 2-9 units is too low, and that it should be fixed at 20% (Policy H4.1 Housing Choice (f)).

Much also depends on how the financial contributions are to be spent, of which there is no detail here.

With regards to conversion of dwellings in paras 4.1.13 et seq, we support the requirement on family homes in para 4.1.14. We are also keen to see recognition in the policy that the housing mix in some areas is massively impacted by applications for housing conversions (such as in the Apostles in Raynes Park, or in Graveney ward), and such areas need protection in the policy.

We agree with the thrust of para 4.1.28.

16. Do you have any additional comments on Policy H4.1?

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 Policy makes no mention of 'Right to Buy' or the proposed voluntary right to buy for housing associations, or the role of Community Land Trusts (although we note Housing provision: H4.2 (e))

17. Housing provision: H4.2 - Do you agree this policy supports the aims of delivering additional homes for the plan period?

The policy supports the aim, but whether it will be enough to achieve the requirements of the new London Plan is unclear.

We support the aims of the proactive measures set out in para 4.2.8–4.2.10.

18. Do you have any additional comments on Policy H4.2?

There remain questions about how deliverable the requirements of the new London Plan are in practical terms, particularly given significant skills shortages in the home building industry.

19. Housing mix: Policy H4.3 - Do you agree that this policy ensures proposals contribute to meeting the needs of different households

N/A

20. Do you have any additional comments on Policy H4.3?

We welcome the support for 'Build-to-Rent' (Policy H4.3 Housing mix and paragraph 4.3.8 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 (and cf the min requirement of 50 units in Policy H4.7(a)/ draft London Plan policy H13), 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 set up a discretionary licensing scheme for private rented accommodation.

21. Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system: Policy H4.4

Do you agree that this policy ensures clearly sets out the requirements for proposals for supported care housing?

Merton Liberal Democrats are disappointed that the plan does not make clear any efforts to promote the building of supported housing, despite the administration's desire to reduce reliance on out of borough placements for mental health in particular (as a budget saving).

A high number of out of borough placements 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." 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.

We feel it would be helpful to define what is meant by "external environment is unsuitable" in para 4.4.5. Again, more explicit reference in the site allocations may assist with this.

22. Do you have any additional comments on Policy H4.4?

The definition of "vulnerable" in para 4.4.2 is presumably here to assist understanding the concept of "non-vulnerable groups" and "types of accommodation ... not specifically for vulnerable people", but the way it is formatted means it reads:

"Policy H4.4 does not relate to:...

- Vulnerable people include those with physical and sensory impairment, mental disability, drug and alcohol dependency or people who have experienced or are at risk of violence (e.g. domestic or hate crime)."

This is confusing at best.

27. Build to Rent: Policy H4.7 - Do you agree that this policy sets out the requirements concerning Build to Rent proposals?

We welcome the support for 'Build-to-Rent'. Such schemes will be difficult to deliver in Merton because they are likely to be of around 100 units (and cf the min requirement of 50 units in Policy H4.7(a)), but they can provide important competition for private landlords and should drive up management standards, as well as accelerate the supply of homes.

28. Do you have any additional comments on Policy H4.7?

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 set up a discretionary licensing scheme for private rented accommodation.

6. Places and spaces in a growing borough

This is an especially important section because getting 'good design' and avoiding 'bad' is crucial to enhancing Merton.

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 extremely poor experience to date.

31. Urban design and the public realm: Policy D5.2

With regards to 5.3.2 (a) Merton Liberal Democrats, would like to see development strongly encourage, not merely facilitate cycling, walking and use of public transport.

We would also like to see 5.3.2 (i) –toughened up to being included in all development proposals and not included only by exception in the most extreme cases.

33. Design considerations in all developments: Policy D5.3

We feel that residential development 5.3(i) should be in an appropriate location suited to such use. i.e. the policy should avoid residential building or conversions in the middle of light industrial estates.

With regards to 5.3 (ix) – We believe this flexibility should not be afforded where it is reasonable that the dwelling would be occupied by a household which includes children.

With respect to 5.3.x – Flatted development should not be encouraged in a location where community parks and playgrounds are more than a 10-minute walk away.

35. Alterations and extensions to existing buildings: Policy D5.4

We feel it is appropriate that alternations to existing buildings resulting in new dwellings should adhere to the same standards on interior and exterior space as outlined in D5.3

37. Managing Heritage Assets: Policy D5.5

With regards to policy 5.5 (c) we are concerned that there is the potential for heritage assets to be traded off against other policy objectives. This would be highly undesirable.

39. Advertisements: Policy D5.6

41. Telecommunications: Policy D5.7 - Do you agree that this policy will encourage high quality design and protection of amenities within the borough through appropriate design of telecommunications equipment?

We would like to encourage the retrospective identification of sites not in compliance with this policy and work with telecoms companies to rectify these sites by removing redundant cabinets or consolidating where possible.

43. Shop front design and signage: Policy D5.8

Do you agree that this policy will achieve high quality design and protection of amenities within the borough through good quality shop front design and signage?

45. Dwelling Conversions: Policy D5.9 - Do you agree that this policy will protect the number of family-size dwellings in the borough whilst allowing appropriate dwelling conversions?

We believe that the result of a conversion should not result in a contravention of the policy on minimum outdoor space requirement for any of the resulting dwellings.

We also believe that the result of a conversion should not result in a contravention of the policy on minimum indoor and room size requirement for any of the resulting dwellings.

With regards to conversion of dwellings, we support the requirement on family homes in para such as in 4.1.14. We are also keen to see recognition in the policy that the housing mix in some areas is massively impacted by applications for housing conversions (such as in the Apostles in Raynes Park, or in Graveney ward), and such areas need protection in the policy.

7. Infrastructure

49. Infrastructure: Policy IN6.1 - Do you agree this policy supports the aim of securing the necessary infrastructure required to support growth in the borough over the Local Plan period?

We note that Policy IN16.1 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, e.g. a “nearby schools bonus” to spend on refurbishing local schools that have experienced strains to their refurbishment budgets recently).

51. Social and Community Infrastructure: Policy IN6.2

Do you agree this policy supports the aim of providing and improving social and community infrastructure?

In Policy IN16.2 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;”

8. Transport and Urban Mobility

55. Improving travel choices: Policy T6.4

Do you agree this policy supports the aim of making Merton a healthier, cleaner and inclusive place?

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),

Liberal Democrats do not believe, as stated in 6.4 (b) that the policy should aim for people to 'travel less'. Travel by non-active means (i.e. by car) should be reduced by making other forms (walking, cycling, public transport) more enticing when compared to travelling by car.

57. Prioritising Walking: Policy T6.5 - Do you agree this policy supports the aim of encouraging more people to walk?

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)).

59. Prioritising Cycling: Policy T6.6

Do you agree this policy supports the aim of encouraging more people to cycle?

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.

Policy 6.6 (e) fails to define 'large' in this context. We do not see any reason why facilities to support cyclists should not be incorporated into all but the most constrained non-residential developments.

9. Economy

67. Promoting economic growth and successful high streets: Policy EC7.1 - Do you agree this policy supports economic recovery, business investment and jobs growth?

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.

Policy EC7.1 Economic Development (j) 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.

79. Protecting corner / local shops: Policy TC7.7 - Do you agree this policy supports corner and local shops?

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.

We believe that non-retail business in an area needs to be supported in order to help maintain the viability of the retail offer.

10. Green and Blue Infrastructure

85. Open Space, Green Infrastructure and Nature Conservation: Policy O8.1 - Do you agree this policy supports the aim of protecting and enhancing Merton's open spaces, green infrastructure and the natural environment?

With regards to O8.1 (e) we would like to strengthen this policy (noting that a Tree Strategy is currently under development), to increase the number of British native trees. We believe there should be an emphasis on tree cover and not only the number of trees.

91. Protection of Trees: Policy O8.4 - Do you agree this policy supports the aim of protecting trees and enhancing other features of the natural environment?

Merton Liberal Democrats would like to strengthen O8.4 (c) to require developers to replace trees when planning permission is granted resulting in tree loss. We propose new trees at the rate of 3 new trees to one lost mature tree. Where each new tree at maturity would provide at least the same amount of habitat and impact on CO2 as the lost tree would have if it had not been lost. These replacements should ideally be made on or near the same site or if not practical at an alternative location within the borough.

11. Proposed Changes to Policy Maps

109. Morden Policy Maps

There have been some proposed changes to the Policies Maps in the Morden neighbourhood. These include MOL, Open Space, SINC's and Green Corridors.

Do you have any comments on the Policies Maps or any changes to the Policies Maps for Morden?

Merton Liberal Democrats would like to express that we agree with

- Extending the SINC in Morden Park
- Retaining Green Corridor in Morden Park
- Retaining Open Space designation on land at Cannon Hill Common

12. Climate Change

We consider that the basis behind the Local Plan needs to change, to instead it should firmly focus on the Climate Emergency and Sustainability. The main issues for inclusion are as follows: -

- Establish the borough's carbon reduction target and road map climate Action Plan to delivery in the local plan.
- Reduce the burden that falls on future generations of responding to climate change and tackling the negative impacts of climate change, particularly on human health, which are more likely to be felt by the most vulnerable.
- Incorporate electric vehicle charging points in new developments.
- Providing more walkable and cyclable neighbourhoods that reduce demand for car use.
- Requiring new residential schemes to exceed the fabric energy efficiency required under Part L of the Building Regulations 2013 and achieve a higher standard than is required by any subsequent revisions to Building Regulations.
- Requiring major non-residential development to meet the BREEAM very good standard or higher.
- Promoting the retrofitting of existing buildings, including incorporating measures to reduce energy consumption.
- Identifying and supporting a range of opportunities for the delivery of renewable and low carbon energy through community backed schemes.
- Maximising carbon sequestration, by including "Woodmeadows" in development schemes and introducing into parkland in the Borough.
- Significantly increasing the number of trees and extent of woodland, such as through City Forest Parks and the planting of street trees
- Incorporate moving of underground cabling from utilities facilitating the planting of trees part of the developer's responsibility thus improving the sustainability of street trees (small tree pits fail trees)
- Include the forthcoming Tree Strategy and refer to this in the New Local Plan.
- Restrict where possible the loss of existing canopy cover and acknowledge greater protection for trees.
- Restrain from erecting street signs on roadside verges where trees could be planted.
- Increase tree canopy on the street scene to mitigate overheating from climate change.

- Mitigating and adapting to the impacts of climate change, including by:
 - Providing shade and green infrastructure to reduce overheating of urban areas during warmer summers.
 - Increasing the extent, and introduction for biodiversity of wildlife habitats to enable animals and plants to adjust - developers to incorporate Swift boxes, bird boxes, bat boxes, "insect hotel" bricks, log piles in all new development.
 - Planting of British native trees.
 - Do not lose "Green Corridors" but add to these to mitigate biodiversity loss.
 - Promoting greater water efficiency to minimise the potential for drought - developers to supply water butts to all new developments for residents.
 - Developers to supply Compost bins for recycling of green waste to new builds.
 - Sustainable drainage- discourage residents from paving over front gardens and over building on back gardens.

- Respond to the economic and policy changes that are likely to accompany climate change.

- Encouraging businesses to take advantage of new economic opportunities associated with reducing carbon emissions.

- Reducing air pollution to minimise the potential for higher temperatures to worsen air quality.

- Supporting the sustainable movement of freight, such as through urban consolidation centres that facilitate zero carbon last mile delivery.

- Monitoring air pollution. Air pollution often originates from the same activities that contribute to climate change (notably transport and electricity generation, but also to a lesser degree industrial activity). The air pollutants of greatest concern in the UK now are particulate matter (PM), Oxides of Nitrogen (NOX), ozone (O3) and Ammonia (NH3). Traffic is the major reason for episodes of raised pollution levels in the town centre. The air pollutants identified above are all identified in the Kyoto international agreement and the Climate Change Act 2008 as 'greenhouse gases' (GHGs) which exacerbate climate change.

- Increase monitoring stations which measure nitrogen dioxide2 (NO2) and particulate matter (PM10), include monitoring of PM2.5s.