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MERTON PARK WARD RESIDENTS ASSOCIATION

Future Merton Team,
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Merton Civic Centre,
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SM4 5DX.

15.1.2019

Dear Future Merton Team,

LOCAL PLAN 2020 - 2ND CONSULTATION

We are grateful for Future Merton's professionalism in producing the Local Plan and the fine tuning since the 1st Consultation. We are generally in support of the aims and protections provided and would like to present our observations for the 2nd Consultation.

MORE MORDEN – the strategic vision (1.25) promises that “Morden will be a place people now want to visit, not just pass through”. Even better would be if Morden were to become a place where people want to make their homes and stay for the long term. Morden will thrive if it can build a sustainable resident community in the town centre.

Before plans for a public piazza to replace the bus stand in front of the Underground station can take shape, the present dominance of

traffic through the town centre at the expense of pedestrians must be addressed. Discouraging commuter parking is part of the solution, as restricted turns and the gyratory system mean commuters contribute to traffic congestion around the town centre as they enter and leave the car parks. We endorse the Healthy Streets Approach for Morden, including the potential removal of the gyratory (2.3.35).

Wimbledon Town Centre

Whilst not in our Ward, Wimbledon Town Centre is the place which many of our residents regard as their Town Centre. We are aware of ongoing concerns about the heights of buildings proposed, particularly over the Station. Wimbledon Town Centre workshops definitely expressed a desire to limit heights and certainly we would not wish to see Wimbledon follow the example of Croydon.

Future Merton will be aware of further development in the City of London and other centres, and a totally new development proposed down-river from Canary Wharf. With that competition in mind, we would feel more supportive of the Masterplan if it set a lesser height more in line with public opinion and said that greater heights could be considered if a robust reason occurred which included full occupation and commercial viability. We have in mind that this could become the case if and when Crossrail 2 proceeds and requires the remodelling of the Station. The Council has already stated in its submission to Crossrail 2, that Merton cannot just accept their plans “at any cost”. Both the Station and the Town Centre would need to continue to function and allowing a tall building over the tracks could ensure that.

Housing choice (H4.1) – housing rental costs in Merton are higher than they are nationally, leading to real problems in retaining key workers such as teachers, health professionals and social workers. So MPWRA endorses the affordable housing target 50% (35% minimum for private sector land) for development of 11 units or more. This compares with the current target of 40% and recent achievement of just 19%.

Housing provision (H4.2) – since it was published over a year ago, we have been concerned by the Mayor’s housing target for Merton. It is completely unrealistic to expect the target to be raised to 1328 new homes pa, an increase of 223% on the present target of 411 new homes pa, and the biggest increase to be imposed on any of London’s 32 boroughs. Merton has slightly exceeded its current target each year for the past decade (if commercial to residential conversions are included), but there is no evidential basis to support a target three times as big. **We therefore welcome the rebuttal of the Mayor’s housing target for Merton (4.2.15), and endorse the plan to stay with the current target of 411 new homes pa, which is realistic and achievable.**

Housing mix (H4.3) – we endorse the continuation of the current policy of providing 1-bed, 2-bed and 3+ bed units in equal proportions, and contrast this with the distribution achieved in recent years of 47% 1-bed, 33% 2-bed and only 20% 3+ bedrooms. Future planning applications should be assessed with a view to redressing the balance - policy D5.9 requiring the re-provision of 3 bed family units in family home conversions can help to achieve this.

Infrastructure (In6.1) – this is especially pertinent to the Morden Regeneration Zone, the largest redevelopment site in the borough. With 2000 new homes proposed, hard and soft infrastructure planning needs to be integral to the project from the outset. We therefore welcome the requirement that new developments provide for any necessary infrastructure (In6.1.c), that the provision of services and facilities is to match projected population growth (In6.1.d) and that infrastructure be completed prior to occupation (In6e). In particular, we welcome recognition of the need for public toilets (6.2.2).

With regard to **In6.1.d** we should like to add the following sentence: "Bearing in mind that many housing developments will be too small to accommodate adequate infrastructure, Partners should be asked to specify their alternative needs and site requirements, naming sites where appropriate, as part of any necessary infrastructure expansion".

The Infrastructure Needs Assessment (6.2.4) should take account of the projected pattern of demographic changes; especially 46% anticipated growth in the 65+ age group by 2035. This will impact demand for housing types and tenures, and leisure and healthcare facilities. Where existing facilities (eg. for education or healthcare) are to be expanded to meet the increase in demand, adjacent sites should be safeguarded to accommodate expansion.

MORDEN SITES

Mo4 MORDEN REGENERATION ZONE – we have been involved in plans for the regeneration of Morden town centre for the past decade, so we are curious to see how an increased housing target (from 1000 to 2000 new homes) is to be fitted onto a smaller site.

Much of the development will have to be at a very high density, so design quality will be key as MPWRA does not want to see targets achieved simply by stacking units higher. Building heights should remain subordinate to the Civic Centre, to a maximum 8-10 storeys in the centre, progressively stepping down to the north and west. Policies promise to ensure “surrounding suburban areas ... are respected for their low density, local suburban character and green spaces” and to manage the transition between centre and suburb: “to be respectful of these sensitive edges to ensure neighbouring occupiers are not adversely affected” (2.3.68) – these are important to us. The Wider Morden Town Centre Area will act as a buffer between the Regeneration Zone and the suburban Morden Neighbourhood in many places, but where the transition is abrupt (eg. Windermere Avenue, Kenley Road, and Daybrook Road) the interpretation of this policy will be critical.

We applaud the ambition to “transform the look and feel of Morden” and favour the mixed use development proposed that will include green infrastructure as well as residential and commercial units. We share the belief that “mixed tenure and a range of dwelling types create a mixed community... that is robust to change and protects against decline” (2.3.27) Housing provision should not be dominated by studio and one bed flats to the exclusion of family units, so that households do not have to move out as they expand. At the other end of the life cycle spectrum, we would like to see housing designed for the needs of older people, both to cater for this growing demographic and to encourage movement from larger homes in the suburbs, thus freeing them up for growing families to move into.

We agree that the high street cannot depend on traditional retailers in the future, and leisure and recreational uses, and professional and

personal services should be encouraged. For these to succeed an adequate supply of short term parking is essential, to serve the needs of shoppers and visitors.

Mo5 MORDEN ROAD CLINIC – we support the redevelopment of the site to include residential as well as healthcare uses, but would prefer the reprovision of a healthcare facility “with similar or greater capacity” within the town centre. Either way, an NHS primary healthcare facility is essential and a suitable site should be safeguarded from the outset.

Mo6 YORK CLOSE CAR PARK – TfL propose the site be redeveloped for residential use. However there will always be a need for some long stay parking close to the town centre e.g. “essential user” staff based in the Civic Centre, and York Close may be best placed to provide it once other parking options in Morden have been redeveloped.

Place making and Design (D5.1) – we strongly support these policies, including limiting tall buildings to Wimbledon, Morden and Colliers Wood town centres (subject to more specific comments on building heights in Morden and Wimbledon). We value the input of the Design Review Panel at the pre application stage where design is a factor in major proposals (5.1.6)

Urban design and public realm (D5.2) – we support these policies, especially j (loss of front gardens to parking) – see also later comment, and the presumption against gated developments (5.2.10).

Design considerations (D5.3) – we support all the policies that have been carried across from the current DMD2, plus the three additional policies setting minimum internal and external space standards, and we endorse the aim to reinforce a sense of place by recognising the local distinctiveness of areas (5.3.1)

Policy D5.3 a) xiv: Construction Activity We should like to propose a second paragraph:

“Where damage to roads, pavements, crossovers, and other items of infrastructure in the public realm can be shown to have been caused by development work, the Council may seek to recover the cost of repairs from the site owner. It would be the responsibility of the site owner to recover such costs from their contractors if that was appropriate. To prove the condition of the relevant public realm prior to commencement, the Council may require photographs to be provided by the site-owner as a condition of permission to commence.”

Alterations and Extensions to existing buildings (D5.4)

We should like to see policy DMD 3 a) iv carried forward from the old Plan for inclusion in D 5.4 in the new Plan. DMD 3 a) iv states “Respect space between buildings where it contributes to the character of the area.” This has been useful in dealing with various planning applications.

Shop front design (D5.8) – we welcome the strengthening of guidance against the installation of solid security shutters, internally or externally (5.8.4.5.8.6)

Dwelling conversions (D5.9) – we welcome this new policy to safeguard the provision of 3 bed units where family homes are converted into smaller units of accommodation. It will help to offset the under provision of 3 bed units in the overall housing mix.

Basements (D5.10) – we support this more detailed policy and the presumption against basement creation as a source of rising inequality in housing wealth (5.10.4)

Car parking and servicing (Tc6.7) Under Justification 6.7.9 we believe “quite delivery” should read “quiet delivery”.

Economic development (Ec7.1) – we approve the use of an Article 4 Direction to remove permitted development rights from offices which could otherwise be converted to residential use without planning permission (7.1.12) but we regard the case against live/work units as unproven in the absence of any statistical evidence that they revert to single use (7.1.22). The concept of live/work units is sound, eliminating the need for travel between home and work.

Neighbourhood parades (Tc7.6) – the award winning Morden Court Parade has been omitted.

Tourism development (Tc7.11) – Merton’s parks and open spaces play an important role in attracting visitors, (eg Wimbledon Common, Morden Hall Park) yet no mention is made of them in this section, only under Environment.

Open space (O8.2) – policies g) and h) are extremely important to the granularity of the street scene, and we would like to see them strengthened with a presumption against new dwellings in back

gardens, and a requirement (not just an expectation) that proposals for paving over front gardens will include appropriate permeable landscaping. There is no justificatory text for these two policies which could do so much to safeguard the character of established suburbs.

Yours sincerely,

Hubert Child
Chairman MPWRA

Cllr Peter Southgate
Leader, MPWIR