

Tel: 0208 540 3087

MERTON PARK WARD RESIDENTS ASSOCIATION

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Paul McGarry Esq,
Future Merton Team,
London Borough of Merton,
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Dear Paul,

Local Plan consultation

I want to reply to the Local Plan consultation on behalf of MPWRA but the computerised questionnaire format is a bit difficult to circulate round the MPWRA committee. I therefore enclose **a copy of our response to the Mayor of London's Housing strategy** which encompasses a number of concerns. I would particularly draw your attention to the paragraph, on the second page, concerning infrastructure planning, which should include water, sewerage, waste management, as well as schools and already strained NHS facilities.

I attach, as appendices below, comments on Morden, Housing Growth & Infrastructure, Diversifying the Housing Market, and Affordable Housing.

Beyond that I have picked up on a few other points prompted by the questionnaire, as follows:

Build to Rent

There is an obvious need to build for rent, but controls would be necessary to see that increased funding for build-to-rent did not further push up house/land prices making it ever more difficult for would-be owner occupiers to afford their own homes.

Modular Housing

Good quality modular housing should be considered subject to architectural and environmental issues. Due respect must be shown for the architectural style of the surrounding area.

Demolition to provide sites for development

Whilst a high quality is expected of replacement architecture, it is important that current occupiers, both of homes and business premises, can afford to continue to live or work in the areas concerned.

A realistic view of parking and cars

All town centres need adequate parking to make shops and offices viable. Residential developments must include adequate parking to avoid overspill into surrounding areas .

Height and massing of developments

Public opinion is not in favour of too much high rise. When an MPWRA meeting was first told of the proposed height of new buildings in Morden Town Centre there was objection. Similarly, at the Wimbledon Town Centre workshops there was considerable concern about the amount of high rise already appearing down the Broadway long before any Wimbledon Town Centre plans materialise. There is considerable concern that Wimbledon Broadway, relatively narrow from the Theatre going out of Town, could suffer a tunnel effect and become a darkened area. The darkening effect of high rise in too concentrated an area needs careful consideration.

Crossrail 2

We will perhaps see the next consultation on Crossrail 2 quite soon. It will be essential to enforce the “not at any cost” stance taken by the Council so far.

We are looking forward to seeing you at our February meeting.

Wishing you and the Team a very Happy 2018.

Yours sincerely

Hubert Child
Chairman MPWRA

Please see Appendices 1 to 4 below

Appendix 1:MORDEN

Height of Buildings

A recently published artist's impression of the view from the front of Crown House shows new buildings to a height of 12 storeys. This is probably more than the public is expecting.

In particular, the height and massing of buildings to the North of Morden Station and up into Merton Park must adequately respect the street scenes of the existing housing.

Size of Flats

Merton's Housing Strategy calls for the provision of housing units by number of bedrooms in roughly equal proportions. Across the Borough, we support this, but for the development in Morden, the emphasis should be on 1 and 2-bedroom units as starter homes, for younger people using the excellent transport facilities to get to work.

We think there will be a minor degree of need for three bedrooms and above. Whilst not necessarily talking about overcrowding, we are aware of existing units in Morden where the accommodation seems less than ideal for the size of families occupying them. This results from younger people staying on in smaller units despite a growing family. Some small provision of 3 bedroom units and above, both affordable and otherwise, should be considered. Such families may be unable to afford the progression to a 3 bedroom house, but a 3 bed flat might be more within reach. The arms of the development running North into Merton Park might be the best place to provide any family accommodation.

We believe there will be demand from people downsizing from family homes, which could be for 3 bedrooms, as well as for 1 or 2 bedrooms

Parking

All town centres need adequate parking to make shops and offices viable.

If family accommodation is provided (please see above) some may have cars. Similarly downsizers may wish to keep a car. There may be a need for a limited number of residential parking spaces in the Morden development.

We appreciate that the London Plan opposes this, but our residents are concerned about overspill into existing streets and hope that there is room for a common sense approach.

The Abbotsbury Triangle

We are aware of concern expressed by residents of the Triangle. Will the Borough be proactive in finding alternative accommodation for them?

High Rise building and air turbulence.

Strong winds already occur in Crown Lane due to the effect of Crown House. With further tall buildings proposed, a study should be undertaken to see how suitable architecture can mitigate the danger of Morden becoming "Windy City" (even more).

Public Realm

We support proposals to reduce the impact and severance, caused by traffic, and to create a more favourable and healthy environment for pedestrians by greening walkways and public spaces. Opening up vistas towards Morden Hall Park would transform the outlook from the Town Centre.

The recently published artist's impression of the view from the front of Crown House gives a favourable impression in this respect, however it does appear to have a lesser footprint than the current buildings. It may be necessary to resist pressure from developers to increase the footprint, which would lessen the environmental improvement.

Please see below

Appendix 2: HOUSING GROWTH AND INFRASTRUCTURE

1. Underinvestment in new housing for London over many years has resulted in severe shortages, and we accept the need to increase supply across London, lifting the annual target in the London Plan by 53%. However we query the unequal distribution of this target between the 32 London boroughs, and in particular the burden placed on South West London – Merton, Sutton, Richmond and Kingston.
2. Our starting point and principal concern is the “very challenging target” set for Merton in the London Plan of 1328 new homes a year, up from the current target of 411 new homes. This is an increase of 223%, larger than for any other London borough and quite out of proportion to the increase proposed across London as a whole. It seems excessive when set against the population of 205,022 projected by the GLA for Merton in 2030 – barely any increase on its current size.
3. In the absence of any evidence that growth on this scale can be accommodated, the target should be resisted, unless the call for sites demonstrates that there is actual capacity within the borough to ramp up residential development on this scale. For the past few years the current target of 411 new homes has been met but not exceeded.
4. Of the various measures proposed to increase housing supply, we support the redevelopment of supermarkets and other single storey retail units to incorporate residential accommodation above. We also favour the concentration of new tall buildings in locations where there are already tall buildings eg. Colliers Wood.
5. However we oppose any relaxation of current minimum space standards for new homes, and proposals to allow neighbours to redevelop adjoining garages into residential units. We also oppose the conversion of houses near town centres into flats without full planning permission.

Please see below

Appendix 3: DIVERSIFYING THE HOUSING MARKET

1. There is a need for appropriately sized housing for older people who want to move out of homes that have become too large for their needs, or difficult or expensive to maintain – “downsizing” If this accommodation can be provided within Merton, it will enable older people to maintain social networks which would otherwise be lost if they were to move away. Such networks become more crucial when a partner dies.
2. Apart from supporting the health and wellbeing of older people, moving into appropriately sized housing will often release a larger family home onto the market, thus providing for those starting or expanding a family. Availability of a mix of housing types allows residents to put down roots and stay in the borough even as they move from home to home, contributing to a sense of stability and social cohesion.
3. Forms of semi-communal living further help to combat loneliness and social isolation, but are better suited to those living alone rather than couples.
4. Analysis of the register self build applicants shows that only 10% live within the borough, and efficient land use is not their priority. Such developments should be expected to meet minimum density requirements for the area. We do not support mandatory high density requirements for self build developments.
5. Requiring build to rent developments to be held for more than 15 years as rentals may not be reasonable; for example, developers may need to realise capital values after 15 years to progress their business.
6. While more flexible application of minimum space standards may in theory increase the supply of compact homes, such a general dispensation could encourage a “race to the bottom” and is to be resisted. Special cases such as the Y-cube development for the YMCA should always be justified against the needs of particular user groups.

Please see below

Appendix 4: AFFORDABLE HOUSING

1. While the proposed minimum requirement of 35% affordable housing on private land without a viability assessment is less than the current requirement of 40%, it may more realistically reflect what is attainable.
2. We support the proposal for Merton to publish viability assessments provided by developers.
3. Whereas Merton's guidance is on the number of homes to be provided and the Mayor's guidance is based on the number of habitable rooms, we favour the retention of homes as the unit of account. Use of habitable rooms may favour the construction of larger homes, but could also encourage the unintended development of unauthorised HMO's .
4. Merton's current requirement is for small sites (10 units or fewer) to make a proportionate contribution to affordable housing, but since 2014 small sites have been exempted from this requirement. We favour the retention of the affordable housing requirement for all sites.

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1.12.2017

Merton Park Ward Residents Association: Response to the Mayor's Housing Strategy
Matters of Concern

Controlling the expansion in housing needs

London cannot forever go on providing more and more homes. Employers thinking of expanding their workforce should be encouraged to consider opening premises elsewhere in the UK in places where the type of staff they require are likely to be available. Relocation for existing premises and willing existing staff, should also be explored.

Considerations regarding multi-storey housing

Plans for multi-storey blocks of flats can provide the number of homes required but such blocks have shadows that could exclude sunlight from whole areas if placed too close together. Recreational areas, between the blocks, for children to play in, will be essential for flat-dwelling families. Such recreational areas should be positioned to provide maximum light and air. This will be essential for children's health.

The number of stories in a block should respect the nature and scale of the housing in the immediate surroundings.

Costing a development and its provision of social housing and infrastructure

Too often developers come to Councils halfway through a project to say that promised social housing is unaffordable without unacceptable loss of profit. Local authorities must be required to see costings, and to give them rigorous examination, before planning permission is granted. Developer must be made aware that a commitment to social housing is not subsequently re-negotiable.

They will then know that they need to be careful not to overpay for sites.

Infrastructure provision

Land is being allocated to housing without saying where the necessary infrastructure (e.g. schools and hospitals) is to go. Before granting planning permission for major developments, Local Authorities must be legally required to show that they considered provision of schools, medical centres and hospitals for the influx of new residents. An already overcommitted NHS must be asked to show what extra facilities they would provide and where. Councils must allocate land to provision of schools and other social infrastructure at the same time as allocating land to housing.

Hubert Child

Chairman MPWRA