

28 December 2018

FutureMerton team,
London Borough of Merton,
London Road,
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Dear Future Merton Team,

Merton Local Plan 2020 Consultation Response

I have been a resident of Merton since 2000 and am keen to support the most effective strategic vision for our Borough that addresses directly the most pressing issues that will face residents over the next 20 plus years. I offer the comments below as a constructive response to the Local Plan. I hope this is helpful.

There are three underpinning elements of the Local Plan that raise particular concerns regarding the future success of Wimbledon Town Centre in particular but also the surrounding neighbourhoods.

- i) The promotion of office development above other uses and particular via taller buildings

The economic chapter seems to be based almost entirely on the assumption that building offices will encourage businesses to relocate to Wimbledon. However there is little evidence provided to support this view. A similar policy was introduced in the City of London in the late 1980s with disastrous consequences of over-supply for what was already an international finance centre. Why is there a view that it would work in Wimbledon? Evidence from Croydon would also suggest that such a policy is fundamentally flawed. What may appear to be the highest standards of design at one point in time will date. On a relatively small scale a town centre can accommodate this but high density tall buildings will dominate our relatively small town centre.

The outcome of encouraging office development at increased density and height in Wimbledon Town centre with no clear indication of demand brings increased risk of vacant buildings with little or no incentive for landowners to invest in the maintenance of public realm or public facing areas of their assets leaving residents with dead frontages and un-managed spaces and the potential for all the poor consequences that flow from underinvestment.

Such an increase in supply of office space would depress office rents, again reducing landowner incentives to invest in the assets and contributing to a downward spiral of value. Any initial increase in council income from rates would be rapidly absorbed by repairing the damaging consequences of decline.

These outcomes are visible to everyone in Croydon which is currently significantly blighted by over provision of high rise offices, no doubt considered high quality design when permission was being sought. This is a poor blueprint for Wimbledon town centre.

The combination of potentially low value office jobs and high provision of night-time economy in the surrounding area presents a significant medium term risk of increased anti-social behaviour within

the town centre. There is little if anything in the Local Plan about investing in education and training of the local labour force to the level that would add to the attraction of the location for higher value roles. The references to skills rely on third party provision or partnerships and the provision of job and training through development programme. These are hardly the roles of the future. I could find no reference to the digital economy other than in the title of the Infrastructure Chapter – is this an error or does the author not consider the digital economy significant for the future economy of Merton?

ii) The very limited expectations of sustainable outcomes

In the context of damaging consequences of climate change the approach to environmental protection and enhancement is extremely weak. Paragraphs 5.3.15 and 16 of the Design Chapter are severely lacking in terms of any ambition and suggest that council does not have a clear understanding of the opportunities this exercise presents. There is very little if any expectation of positive environmental outcomes from development. Indeed 5.3.16 is merely a statement of fact with no accompanying expectation. With recent announcements by other cities of targets for carbon neutrality by 2030, this plan out to 2040 demonstrates a complete failure of the council to address this most urgent concern and make a full contribution to averting the worst effects of climate change. Indeed the clear bias towards dense high rise development, particularly of office buildings, makes this vision for Wimbledon an additional cause of rather than solution to climate change. The combination of additional heat island affects and high energy demand of such spaces may well be simply unsupportable in the medium to long term adding potential obsolescence to the increased risk of oversupply.

The minimal amenity space standards required for residential in policy D5.3 are extremely disappointing and imply dense residential development achieving only the most limited space standards requirements will be permitted. Why such a limited vision for the area? The medium to long term implications of this approach are the provision of poor quality housing that will undermine local land values.

The Environment Chapter is equally weak and fails to grasp the opportunities that this exercise presents. The standard use of terms such as ‘where appropriate’ and ‘where possible’ suggest environmental protection is optional for development. This fundamentally weakens the entire policy section. Businesses are already aware of the importance of addressing climate change and are looking for a clear policy agenda from public agencies. This policy is out of step with this requirement and already dated. I have provided comments on the detailed policies below.

iii) The lack of any reference to the rapidly and fundamentally changing nature of transport.

The lack of any reference to transport infrastructure other than an apparent assumption that all town centre car parks will be redeveloped renders this Local Plan virtually obsolete before it has been adopted.

There is nothing in this or in the Transport strategy that considers the fundamental impacts of the shift to electric vehicles and transport/mobility as a service that will take place over the next five to ten years. The Transport strategy refers to the provision of EV charging points in support of a GLA policy that is now seven years old and severely out of date. This Local Plan should not be adopted without a whole scale review of the transport strategy of the town centre particularly in light of the push it contains for more development and an expectation of increased population.

This Local Plan provides an important opportunity to set a positive, ambitious vision for Merton which places the needs of its citizens at the heart of development. However this requires a much more developed understanding of the critical issues the Borough's residents will face over the next 20 years. Key priorities should be an ambitions response to climate change, to the transition to a more creative, service oriented economy and to a rapidly ageing population with expanding health needs. None of these things are addressed fully within this document. The Health and Wellbeing chapter is woefully inadequate – 7 pages with a good deal of it taken up with limiting fast food outlets. (An obvious policy that should already be in place and dealt with in one sentence.) Where is the vision for providing health services to an aging population?

I have provided more detailed comments in the Environmental, Infrastructure, Design Policies and Wimbledon chapters cross referenced against policy and paragraph numbers below. This draft Local Plan should be fundamentally revised before it is presented for adoption.

Yours sincerely,

Environmental Chapter

O8.1: Merton IS an attractive and green borough. How will this positive characteristic be enhanced and used to support other priorities such as wellbeing, healthcare and combatting climate change? Where is the vision?

Policy O8.1 f) Trees are so essential to air quality as well as wellbeing they should not simply be protected by added to. We are likely to suffer a significant loss of trees through disease over the next thirty years so there needs to be a policy of replacing these and increasing the number of trees with similar native but disease resistant species.

Policy O8.2 a) Why is 'enhance' not used in the opening sentence?

Policy O8.2 a) How is inappropriate development defined? If taken in conjunction with other policies these sites would be at risk from employment generating development and affordable housing.

Policy O8.2 b.i) Surplus to requirements where? Being underused in one location does not mean there is a surplus of such land in other parts of the borough. b.ii should therefore be a requirement not an alternative so any lost space is replaced.

Policy O8.3 e): This is too weak. Phrases such as 'where appropriate' and 'where possible' will be easily used to avoid complying with this. The final requirement for developers to provide full mitigation and compensation is meaningless - how would the full cost of the loss of trees to society be valued? The valuation methods used are easily argued against. The inclusion of this sentence will allow developers to pay a sum to destroy local habitat with the lifetime consequences carried by the local community. This is unacceptable.

8.3.5 Permeable surfaces must be a requirement not simply 'encouraged'.

Policy O8.4 a) How will this be enforced? Street trees are noticeably disappearing in neighbourhoods with no obvious signs of consequence or replacement. What is included in the street and parks services contracts in relation to their maintenance and protection? Has a survey been carried out to understand the current status of trees to ensure there is no loss?

Policy F8.6: What climate change forecasts would be used for this? Given they are changing faster than anticipated this policy seems doomed from the outset. Has the insurance community been consulted as part of the development of this strategy?

Policy F8.6 f: This is far too weak. All developments MUST be part of a Borough-wide SuDS strategy.

F8.8 a) Too weak. 'Having to consider' is meaningless. We will have major residential development schemes which add to local flood risk at zero consequence to the developer and significant consequence to future residents.

8.8.8: There can be a conflict between the provision of green roofs that support biodiversity and the provision of rooftop solar PV which supports local clean energy. The two need to be viewed simultaneously to avoid this.

P.8.9 b) Given the importance of this issue now and its potentially increasing importance, the presumption should be that all developments are air quality positive. Any that are not, should provide mitigation.

P.8.9 Light Pollution i) Any reference to lighting should require the highest standards of energy efficiency and consideration of how it will be powered with a presumption that this will be local.

CC.8.10 This is incredibly weak and completely fails to reflect the urgent action required to combat climate change and the opportunity this document presents to provide visionary leadership for change.

CC.8.10 b): Far too weak. London has a significant energy supply issue which will affect all residents. Every Borough needs to be using local policies to contribute to the solution of this problem, particularly Boroughs expecting and indeed encouraging the level of growth set out in the Plan.

8..10.1 These targets have already been identified as insufficient to deliver the level of change required. As this plan is yet to be adopted it must reflect more up to date targets, i.e. to carbon neutral by 2030, being set in other regions such as Bristol. This has also been proposed for London.

8.10.3 Where is Merton's ambition to be a zero carbon borough? This is a strategy out to 2040 when we will be affected by some of the worst impacts of unmitigated climate change.

CC.8.11. b): Part L 2013 is now old and will be updated. These requirements should be more ambitious. They should also allow for the improvements in carbon mix of the energy grid - both now and in future - and developments should be expected to contribute further to this.

CC.8.12 b): This is a good minimum standard but reflects only the design and delivery of the asset it does not set a standard for operational efficiency. Whilst one might be assumed to lead to the other numerous examples have shown this not to be the case. There should be a requirement for post occupancy monitoring and evaluation to ensure developments deliver the efficiencies they have been designed to and where they don't that remediation is provided by the developer.

CC.8.12 d): This is a good minimum standard but any office building being designed for the corporate market other areas of the policy suggest are desired by the council will need to be BREEAM

Outstanding or equivalent. This has been demonstrated to be achievable across London so there is no reason our Borough should not have a similar expectation.

There should again be a requirement for post occupancy monitoring and evaluation to ensure developments deliver the efficiencies they have been designed to and where they don't that remediation is provided by the developer.

CC8.13 This seems very unambitious and dated as an energy generation strategy. Why no expectation for support of innovation, linking energy and waste, investment in local network etc.?

8.13.4 It is unfortunate that this level of ambition and vision, for which Merton became synonymous, is absent from this Local Plan.

8.13.10 This depends entirely on the source of power for the CHP system. The common solution of gas-fired CHP has been demonstrated to be less carbon efficient than grid sourced electricity so should be specifically dismissed as a low carbon solution within this statement.

8.13.12: This use of heat networks within residential sites has been identified as having poor outcomes for residents. The provision of heat as a service is an expensive option once maintenance and end of life expenses are taken into account. It is also linked with poor occupier comfort through over-heating, particularly in flatted developments which single aspect. There should be specific reference to these issues being resolved within any heat network strategy for major residential schemes.

CC8.14 a): Reference should also be made to the specification of materials that support this strategy including avoiding extensive use of glass facades and atria in office buildings and flats. The use of thermal mass should also be specifically promoted.

8.14.2: This Plan promotes the development of high rise office and residential blocks which by definition will exacerbate heat island effect. How are these two elements reconciled in the Council's view?

CC8.15: This is weak to the point of being pretty meaningless. Circular economy is to be welcomed but is currently insufficiently understood to be accurately interpreted and implemented by this statement. At the very least there should be reference to a system for managing waste construction and demolition materials to form a materials supply chain for new developments across the borough and potentially the wider local region. This is a potential income stream.

CC8.15 a): How does this reduce on-site carbon emissions? It would reduce resource use, which is good, and embodied carbon within the materials element of a building but has no impact on carbon emissions. The statement suggests the author does not understand circular economy or carbon.

CC8.15 b): Should be primary source, not secondary.

CC8.15 d): This seems very weak. There should be a requirement for recycled content within any concrete used on site.

CC8.15 a) e) f) g) h): How does this relate to the resource based principles of circular economy?

8.15.3 - Implementing a local waste materials supply chain this would support the avoidance of new materials use.

Infrastructure chapter

There seems to be an underlying presumption that you can take away community use if you provide housing 'employment generating' uses instead. This will significantly negatively impact the Borough and its residents.

In6.1 a. Given current provision is not sufficient for the increase in population over the last 5-10 years this is too weak. There needs to be an expectation that new facilities will be provided and a system set up for ensuring they are adequately funded and managed for the community.

In6.1e Where it is not possible to provide this ahead of occupation there must be provision to ensure it is provided post occupation. Failure to do this must have consequences that can be implemented without cost to the local authority

6.1.6 This does not set out the issues clearly and even as it is, does not seem to be reflected in the policy. Anticipated changes in demographic as well as population size will be one of the most testing for local authorities in the medium and long term. There should be a requirement within this section of the Local Plan that these changes are clearly articulated, understood and allowed for.

In 6.2: Why no vision or ideas for the future funding of the operation and management of this infrastructure? Without a plan for protected funding the potential increased requirements will make provision financial unsustainable. All new development could be required to support a fund for long term operational management of the local infrastructure.

In 6.2 c.: Why just these two uses? Community and social infrastructure goes beyond employment generating - which implies offices - and affordable housing. This policy appears designed to support the redevelopment of community assets as offices and housing. This would be a dereliction of the local authorities duty to the local population.

6.2.4 Surely this must be completed before this Local Plan is finalised? Is the review looking at coming needs or just current needs? If it is the latter it is rather pointless.

6.2.9 There is also a relationship between this and healthier communities but this is not referenced in 6.2.10.

W.6.3 This policy and the justification seem very weak and lacking any sort of vision. Given the cost of waste management and treatment this is an opportunity for a much stronger vision and the linking potentially of waste management with energy provision for the local area. At the very least there should be a clear support for innovative waste management and treatment systems.

There is zero reference to digital in the infrastructure section other than in the title. Why is this? Digital infrastructure will be fundamental to the future economy. A Local Plan out to 2040 without a clear digital infrastructure strategy that is cognisant of rapidly changing technologies is not fit for purpose.

Design policies Chapter

D5.1a. viii) There does not seem to be any provision for the management of these spaces for the community post development. Who will be responsible for this and how will it be funded?

D5.1 e) 'Should' is far too weak for this - these issues must be considered and no design brought forward which can not demonstrate its inclusion.

5.2 c) What about environmental sustainability? How will these buildings be powered?

5.2 g) Why so weak? This is an important opportunity to add trees and other biodiversity to improve air quality.

5.2 i) Again, too weak, important opportunities will be lost. If it is a clear requirement it will be designed in. If it is not it will ultimately be value engineered out.

5.9.3 The common solution to this tends to be to not provide a sitting room which of course defeats the object of the exercise and undermines the quality of housing provision. This policy should therefore be strengthened by redefining a family sized unit as having three or more bedrooms in addition to a separate living room.

Wimbledon Policy

N 3.6 How tall is taller? Allowing development of buildings taller than existing along the Boardway East would dramatically change the character, look and feel of what is essentially a residential area and to what benefit? The station is at the historic core of Wimbledon.

N 3.6 e: Is there genuine demand for conference facilities? By definition they are ineffective in providing economic benefits to the wider area as all services for events are provided within the facility. They may provide employment but at relatively low skill levels. Is that the aspiration for Wimbledon?

N3.6h): What is a 'parklet'? Is this defined in terms of size/scale anywhere? This may sound good on paper but lots of little bits of green have insufficient critical mass to provide any proper amenity and should not be seen as a substitute for the provision of properly landscaped public realm.

3.6.7: What sort of growth and how much? By promoting excessive growth and trying to accommodate it through more dense, taller buildings the positive characteristics of the area will be in danger of being lost. The outcomes would be negative for the area and the residents. Evidence of this is seen in the surrounding region in Croydon in particular. It would also leave the area vulnerable to the economic volatility that is well known to affect office markets and, with so much real estate ultimately in the ownership of private investors, with little or no means to bring about change

3.6.14-17: As retail is identified within the Local Plan as supporting the strategy of ensuring Wimbledon remains an attractive environment for visitors, a more ambitious approach to the future of retail is necessary. This is particularly the case given the uncertainty presented by Crossrail2. The town centre high street is clearly already suffering from the decline of major retailers. There needs to be a much more proactive approach to enhancing the retail offer within the town centre. Independent and smaller retailers have been identified as something the local residents are looking for in paragraphs 3.6.2 above but are not mentioned here. Why?

3.6.18 This policy should be subject to strict provisions related to ongoing demand for office space. An oversupply of obsolescent office space will severely negatively impact the area for generations. Have the downside risks of this policy been fully explored?

Site Wi1: This is an obvious site for a school. Whilst not large it would be sufficient and being located within a residential area and close to an existing primary the limited accessibility issues would prove little impediment. Additional residential here with no additional school facility makes no sense unless you are a housebuilder.

Site Wi4: The challenge is the road on which the units are located which effectively forms a barrier between the parade and the rest of the town centre.

Site Wi5: How will parking within the town centre be accommodated? If the view is that Wimbledon needs more economic development visitor parking will need to be accommodated. The current lack of parking is already a deterrent for visitors. There seems to be absolutely no reference in this document to the town centre accommodating and supporting the transition to electric vehicles and transport or mobility as a service. Without this the area will fail to thrive

Site Wi11: This site is an excellent example of what happens when what was at the time considered good design dates rapidly. The landowner should be required to provide evidence of their track record in delivering high quality public realm given the sensitivity and importance of this site. The requirement for residential to generate viability suggests a poorly thought through plan.