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Response to the draft Local Plan – Second consultation – January 2019

5 – DESIGN:

Strategic Policy LP D5.1

Placemaking and Design:

Whilst I welcome and find it heartening to see the emphasis of “*highest design quality,*” *the application has been extremely poor. The wording in the policy remains weak. There is a huge chasm between what the planners in the development control team deem as good urban design and what the community sees and continues to fight for on the ground. Design must delight, not be oppressive, loom over and cast streets and public realms into shadow and cold as is the experience in Central London’s Bank area.*

The policy needs to include a detailed design code: The detailed design of development will be controlled by a Design Code, which would set out approved changes within the established parameters (that would solve the issue of retrospective changes post application and ensuring that they do not cause harm to the initial approval). It would provide guidelines on “fenestration” (window sizes and proportions in any given elevation) and a palette of accepted materials, and remove ambiguity as required by the NPPF.

This is from CABI: “London was rebuilt after the 1666 Great Fire using codes. They have been used for health and safety reasons, rationality and order in the cityscape and cohering aesthetic standards.

CABI’s Housing Audits have identified some common problems in the design of new housing schemes. Often proposals do not seem to be underpinned by robust urban analysis nor do design proposals create an identity through the layout of streets, squares and courtyards. Integrating highways design and urban design provides a challenge, in particular providing adequate car parking arrangements that are appropriate to the place.

Codes could help to prevent poorly designed places (see left)...or should we say to help ensure good places!

A design code provides a funnel for looking at the design, development and planning processes and at how the urban disciplines reinforce each other. Design codes allow a more collaborative approach to design and a cross disciplinary decision making process. They allow the fixes to be agreed and then give a more streamlined process for assessing against the code when different developers and designers are involved.

PPS3 outlines the government’s support for design codes. It also defines design codes:

“A design code is a set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and

written components of the code are detailed and precise, and build upon a design vision such as a masterplan, or a design and development framework for a site or area”

A design code can be seen as an operating system that takes the masterplan or design and development framework and develops precise rules to realise that vision. It goes further than urban design guidance because codes contain rules.”

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some myths



The argument against codes is that they stifle creativity, deliver only traditional architecture and stifle innovation, or that codes are excessively prescriptive and restrictive and give rise to formulaic design solutions.

There is nothing intrinsic about coding that prescribes a particular architectural style, while the balance between prescriptiveness and flexibility can be set as needs be. Borneo-Sporenburg in Amsterdam is a good example that disproves the myths. The code allows variety in this terrace (shown left) and prescribes uniformity elsewhere in the development. The code recognises where variety is appropriate.

some thoughts for the future

It is important to learn from abroad, from Germany and Rennes, as well as the Netherlands (there is more information on this in the practice manual), but there is best practice to explore in the UK. Codes for Newcastle and Allerton Bywater include scope for experimenting with shell spaces that users can customise. Ideas about use of codes to promote self-build are worth looking out for - an aborted project in Harlow proposed a 4,000 self-build dwellings.

Finally, there is a lot of potential in coding as a creative and interactive tool. Computer modelling could be used to envisage more interesting urban forms, linked to codes. There is certainly scope for innovation.

the place of codes in the hierarchy of design guidance

taken from
Preparing Design Codes: a Practice Manual, p24 (CLG)



National Policy/Guidance	National Policy/PPUs	Government Guidance
Design Policy/Guidance	Regional Spatial Strategies	County Design Guidance/Standards
Authority-wide Policy/Guidance	Local Development Frameworks	Local Design Guides
Area-wide Policy/Guidance	Area Action	Local Development Standards

Merton Council also needs to complete the borough character reports and have them used as a priority to any development. Transparency in the pre-application stage of applications by involving the community as per the NPPF; there could be some very positive results.

These elements need to be included in Policy LPD5.1 to avoid simply repeating the terrible examples of development or policy interpretation in recent years under the current development plan which also calls for high quality design. With one “bad design” through the door, the many have followed, building on what already existed. This has to stop, else it makes a mockery of all the hard work that has gone into this local plan. There is not one mention of preserving or building on intrinsic character and identity . What is a town without its historical/industrial/ identity and/or green character?

Wimbledon has become an anything goes zone for architecture. What this is doing is eroding and erasing its main character to replace with something cuboid, generic and ugly which is then deemed its current character and identity – Hartfield Road SW19 is a prime example of that. The Fridge on the Bridge has altered all character, followed by Pinnacle House which is anything but Wimbledon, and now the new application for the Hartfield Hotel replacing a Victorian parade, again claiming “quality” but not embracing any Wimbledon design, character, form or materials.

To ensure this does not occur under the new policies:

- Character studies need to be completed
- Clear design code established, with early input from the community (as per NPPF) as outlined above.
- Transparency: the pre-application process needs to support community consultation as early as possible (NPPF) to take into account the views and aspirations of the local community, not just the council as is happening now. With the community firmly on board, not just in name or as a box ticking exercise, the Council and developers will build more with minimum delays.
- The word “*character*”, “*identity*” and “*sense of place*” must be reintroduced into the policy.
- PLEASE CAN WE INCLUDE: **Beauty counts.**
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- **V** – Remove the word “*enhances*” *Merton’s heritage assets* and replace with “*respects*”. Often the “enhancements” that we have had have eroded and destroyed rather than enriched the distinctive character of our heritage assets.

ix: I would like an additional clause relating to facades. There is a lot of emphasis of generalised relationships to neighbouring buildings (many of which are now so awful that it just propagates more bad design) but nothing about how key facades are to our wellbeing, sense of safety, productivity etc.

Proposed clause - (Proposed development must demonstrate)

Ix Facades which show detail, human scale, and beauty, as they are a key part to promoting happiness, increasing the desirability of an area, and heightened sense of safety, whilst also serving as multi-sensory environmental filters. They will link the historical elements and local character of the area to promote wellbeing and sense of place.

Tall Buildings:

((When the NPPF or the London Plan talk of tall buildings, it is for housing. The tall buildings policy in Merton is a Council interpretation of what constitutes “progress.” It is being proven again and again that tall buildings are not beacons of wellbeing, sustainability. Increasing density Does NOT mean tall buildings being the only way forward. This policy needs a serious rethink especially in Wimbledon, Colliers Wood and Morden which are allocated tall building areas in this local plan. You cannot have tall buildings without immediately contradicting other

policy articles to do with vistas, identity, character. Design must delight not oppress.

The Wimbledon Masterplan stressed mid-rise buildings but then translated that into Tall Buildings of 14-18 storeys, despite the area where they are being proposed are only 4-5 storeys high. There have been NO quality tall builds in Merton in the past three years and despite the current tall buildings policy saying none would be allowed unless of “exceptional design and architectural quality,” a metal-clad hotel on Wimbledon’s main thoroughfare at 158-161 The Broadway was allowed to be built. Another seriously poor designed application was approved two doors down, wedging the modern, architecturally awarded CIPD. between two terrible anomalies in spite of existing policy demanding high quality design.

More applications of similar poor design are currently in the pipeline despite the “quality” labelling. It turns the tall building policy into a nonsense. Pinnacle House was cited as being of “high quality” by a senior Merton Council officer, yet it is a reclad, with extension, not a new build. The finish of the building is poor, with the brown/black paint splodgy, the design dark, heavy, and un-Wimbledon.

On page 5-4 Justification (for Tall buildings) please replace the following relating to 5.1.5 *The NPPF states that good design is a fundamental part of the purpose of the planning and development process. And that plans should set out clearly the council’s design vision and expectations.*

Replace the above with (to ensure inclusion of engagement of community and authorities)

5.1.5 “The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

5.1.5a “Plans should set out a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area’s defining characteristics.

5.1.5b “To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places with a consistent and high quality standard of design. Their level of details and degrees of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified.

More specifically, the NPPF guidance on design states that policies and decisions should:

((After point f) please insert the following from the NPPF which is a vital departure from the non-revised version: **Please read 5.1.6 as follows replacing what is on page 5-5 of the local plan:**

5.1.6. It is important that design quality is considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interest. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot. (My emphasis to draw attention to why I would like that included in the new local plan)

((Point 5.1.6. In the draft Local Plan (page 5-5) excludes the community whereas the revised NPPF specifically included that new clause in realisation that better and early communication with the community will help iron out a lot of issues and allow for more building to go ahead. It would be good for Merton Council's development control team to embrace this part of the NPPF and not continue to disregard it. It MUST be included clearly in the local plan please)).

Please also include this

5.1.6a All major proposals where design is a factor will be considered for review by the council's design review panel at the pre-application stage. Efforts will be made to engage effectively with the community as early as possible in line with the NPPF.

. ((There has to be a shift from where we are now with Merton planning. Across the borough, people are tired and fed up of being thwarted when so much could be achieved with some cooperation. The local plan needs to support a review of our **Design Review Panel**. Whilst we are grateful to have a DRP, in recent times it has not been impartial or independent. Having researched other DRPs and who chairs and how note-taking is done, it would appear that Merton's DRP needs a review to make it rise above any perceptions of bias.))

POLICY N3.5 – SOUTH WIMBLEDON

Local Centre:

3.5.3 The area has a very strong historical context: As a member of the resident-led South Wimbledon Enhancement Plan (SWEP) which pushed for South Wimbledon to be recognised as a separate entity to Wimbledon or Colliers Wood, I would like to see those very strong historical contexts weaved into new builds to stitch the history back into the area and the High Path Estate becoming part of the area, rather than an island of anomalous design which hasn't soaked up that this site was Lord Horacio Nelson's "paradise." There needs to be some context in the new High Path regeneration of one of Britain's greatest naval officers and Lady Emma who was a master diplomat, not just his mistress. (More on that later)

South Wimbledon has its own identity, a raft of independent shops – some of them unique – and with the historical elements that can still be seen in its extensive (not occasionally reflected 3.5.3) design of Victorian iron grids and parades, residents want it to become a destination rather than a congested, polluted and cluttered junction of commuters and drivers fighting to get through.

3.5.6 In considering the opportunities for South Wimbledon as a local centre, the council considered several options for the extent of the local centre boundary. The draft Local Centre boundary focuses on South Wimbledon Junction encompassing shopping parades in all directions where shops and services are most likely to be viable due to the higher footfall. However, there may be other options for the boundary and we would welcome comments on this.

I would like to see the South Wimbledon local centre extend from Merton Road (where Wimbledon Broadway ends) to the Industrial Estate on Morden Road, and from the tram lines on Kingston Road to The Nelson Arms pub on Merton High Street. I understand BARA (Battles Residents' Association) have proposed a more truncated version.

Justification:

I believe the BARA option excludes many established, unique businesses that give South Wimbledon its individual and creative nature. Set neither in Wimbledon's BID area, nor being part of Colliers Wood, these shops and businesses would fall into no-man's land. We want a united South Wimbledon, not one with cut off limbs.

Examples of those shops/businesses: The Pottery Shop on Kingston Road which continues to provide teapots to some of London's most exclusive establishments. The piano shop Hanna pianos is the only piano shop between Chelsea and Croydon and is frequented by many from afar.

La Bottega del Pane – an Italian deli/café – and the Gooseberry Bush café plus several new businesses along that Kingston Road stretch must be included in the new Local Centre to continue to maintain a vibrancy and creativity to the area.

In addition, on Merton Road, are a host of individual, unique shops which could do with looking after and supporting as part of the South Wimbledon Local Centre. This whole area was, after all, part of Lord Nelson's estate. Following through the earlier thread in the South Wimbledon plan 3.5.3 acknowledging its wealth of history, it would be only just after all these centuries of decimation to pull together Lord Nelson's estate by reinstating his protection to those shops along Merton Road. The Ballet Shop is a great addition, a cultural link. The upholstery shop moved to the Wimbledon BID area, but we want to attract back and increase creative retail footfall on Merton Road – not just depend on the over-saturation of kebab and fast food shops.

3.5.9 Consultation responses to the Local Plan at Stage 1 and prior to the Local Plan have called for more public space to be created around South Wimbledon. Nelson Gardens along Morden Road is perhaps too far away from the station and the areas of highest footfall to be well used.

“Proposals for the High Path estate, as guided by the Estates Local Plan and set out in the approved Outline Planning Application, will provide a new public park as well as smaller pockets of landscaped space within the estate. However, aside from the regeneration of High Path, there are no large sites in the immediate South Wimbledon area adjoining the main roads and so there is more limited opportunity for the creation of new public space with close proximity to where most people use the Underground Station, shops and services and would benefit the most.”

I don't agree with that assumption that Nelson Gardens is too far from the stations and the areas of highest footfall to be well used. It is rather neglected at the moment due to uncertainty over what will become of it and Not Well Advertised/marked out! This is The Perfect Spot for families and community events – possibly even a grandstand pavilion for summer park recitals for young musicians - if better advertised (I've been to and from the South Wimbledon tube station for over 15 years and hadn't heard of the Nelson Gardens until I got involved in planning. There will be thousands like me! Once there, it is pleasant but needs some TLC.)

On that note, I believe that with the regeneration of High Path, Nelson Gardens will become even more valuable as it will open up the estate and reconnect it with the main hub of South Wimbledon.

Also with the almost 6x increase in people on the estate, Nelson Gardens can play an even more important role. Why can't we turn it into something similar to South Park Gardens? It can be done. We can apply for Lottery money as did South Park Gardens, set up a committee to look after it, involve the descendants of Lord Nelson and reignite the historical reason for its existence.

Accordingly, Nelson Gardens must be listed as a protected site from transport/other developments which would reduce its size or cause its demise. Being on the corner of a very heavily polluted junction, it is imperative to keep the green thriving to combat air quality concerns and improve the environment for those visiting the park.

MEWS conversions into arty/cultural hubs:

South Wimbledon has Hamilton Mews which if cleaned up, could become an interesting walkable back street/lanes style area to sit for a coffee away from the polluted Merton High Street (speaking of which, a traffic management plan is needed to make the walking experience healthy, pleasant, and inspire more sustainable travel other than cars.

I would like to see the roads off Merton High Street like Hamilton Road, Nelson Roads which have parking/parking metres turned into public spaces with benches, a place to delight, quirky with small art installations (by local students/artists) to reflect the history of those street names.

3.5.8 *The council will also encourage businesses and residents to restore or redevelop building facades to a high standard. Merton's shopfront design guide provides practical information about how to assess, design and maintain a successful shopfront and can be used regardless of the occupier of the building.*

Can you please please include the need to stop the urban clutter and the misplaced street furniture that makes walking along Merton High Street in particular a hazardous job. The cycle paths are completely bonkers, ending at a pedestrian crossing and going nowhere from there. Traffic management, and Air Quality concerns are high in that stretch. If public spaces are being created to make people pause, they need to be air neutral and not cause harm at the very least.

3.5.11 HIGH PATH REGENERATION:

The High Path regeneration “will result in the most substantial change to the layout, function and character of High Path. While the Estates Local Plan 2018 provides the planning framework to guide this regeneration, it will also deliver key proposals that South Wimbledon respondents have called for, including a public park fronting Merton High Street, a new layout fronting Merton High Street with new shopfronts and business space; investment in landscaping and the public realm.

With respect, it wasn't South Wimbledon respondents who called for the above. It was presented to us as a fait accompli by Clarion. There is nothing wrong with the concepts, but there is with the application and the designs proposed.

High Path has long been an island in the middle of South Wimbledon with its predominant Victorian and Edwardian iron grid designs and shop parades. The regeneration is a fantastic opportunity to stitch it back into the mainstream of the centre. With the exception of some terrible designs on Morden Road like metal chequered ironically named Madison Heights and generic Spur House, South Wimbledon DOES have a distinctive design.

HOWEVER, the designs being proposed by Clarion as part of the regeneration are again creating a tall island looming out of the centre of a harmonious grid, causing an anomaly rather than a cohesive, seamless neighbourhood. How Clarion incorporates the detailed, human scale stretch of Victorian parade on the opposite side of the road and well beyond, will determine success or failure to reintegrate the estate back into the street. The green public space connecting Merton High Street to the estate will not be enough. It could be the difference between a safe, attractive and welcoming green stretch that invites the community in to being an unsafe, no-go zone neglected and littered.

Without a clear design code that is approved by the community and residents of South Wimbledon, High Path regeneration will be that eyesore we want to avoid.

I accordingly disagree that *“new development proposals must have regard to the proposed regeneration at High Path as well as this plan to ensure that South Wimbledon is developed as a cohesive, attractive and legible neighbourhood. Before designing new schemes, potential applicants for schemes within the vicinity of the High Path estate are advised to refer to the High Path section of Merton’s adopted Estates Local Plan 2018 and to contact the applicants of the outline planning*

*application 17/P1721 to ensure co-ordination **of site designs, uses, materials and movement.**” (My emphasis)*

The materials proposed by the High Path regeneration are a far cry from the terracotta and yellow London Stock, proportioned fenestration and bay windows that make South Wimbledon maintain its identity and character. Instead, Clarion is proposing a range of stone colours including grey, PVC, coloured cladding, all of which do not enhance or respect the area. The development with grey will darken and oppress rather than open up and invite.

We have been slightly successful in imploring Clarion to adopt some of the curves, grace of the overwhelming surrounding character into their designs. However, they have gone overboard and created an over-the-top lopsided arched windows “landmark” façade as per the consultations for Phase II. This is Not the High Quality Design outlined by either the local plan or the NPPF and a more sensitive and less vernacular approach is needed to ensure the Estate is part of a whole and not one that sticks out for all the wrong reasons.

Along Kingston Road, the developer has built flats after demolishing and completely rebuilding two properties, replicating the Victorian grid of houses and returning them to the street. Why can't more of this kind of design be installed into High Path instead of the coloured metal panelling and cladding proposed for the frontage of Merton High Street in what the developer says offers variety. Variety and breaking up elevation can be created through the different use of bricks and brick patterns (Covent Garden offers a very palatable, cohesive blend). No coloured metal please! The statement in the local plan that others developing South Wimbledon would need to follow High Path's design, materials palettes, is ill-conceived unless the regeneration produces the high quality design we desire. Otherwise, the cohesion and character of this Local Centre will be lost before it has even begun.

Clarion must engage early on design, materials with the community and not leave it to planning applications and conditions set by officers who generally see residents as obstructions rather than caring deeply and having some expertise in their own surroundings, IF the cohesion of South Wimbledon is to be preserved.

HEIGHTS:

The High Path Regeneration proposed/outline heights are altering the identity of South Wimbledon. Intensification and density are going to happen, but must occur sensitively. This is a small local centre not a major city centre. The plans began with five floors and have now jumped to double that which is unacceptable. The argument that there were four towers of 12 floors does not justify almost double that number across the whole site.

There should not be a differentiation in materials between social housing and commercial housing to bridge the inequality gap and to allow for a cohesive, integrated development.

The heights proposed are likely to plunge the main junctions of South Wimbledon into cold wind tunnels or block out sunshine, worsening green public spaces that we want to create, and deterring walking/cycling. The microclimatic effect of planning Must be seriously taken into account and not dismissed as a luxury or the whims of

spoilt residents. Heights must be sensitive to the location and visibility of vista points so as not to obstruct, or undermine already active and desirable views (residential views from the Battles/the Australias/ Merton Road and Kingston Road.

Clarion needs to think about curving corners on highly visible points on Merton High Street to avoid sharp, harsh cube-like tall towers which don't exude character and identity, sense of place.

Air Quality must be part of the development and the South Wimbledon Local Centre in design and planning of buildings. There is no mention of it at all for the centre. Asking developers to "explore" ways to incorporate or improve air quality will not produce concrete results and will be a way to avoid doing anything meaningful.

STRATEGIC POLICY H4.1

Housing Choice

Affordable Housing

This section has not been applied to date. It is better to put reachable targets than to quote percentages that are not met. The net level of affordable housing of 11 units or more: ***only in exceptional circumstances will the provision of affordable housing off-site or financial contribution in lieu of provision on site and this must be justified and such schemes will be required to provide a detailed viability assessment...***

This is not happening now with Merton Council planners appearing to pander to developers who claim their plans are no longer financially viable. Why is this expected to change? There should be a clause to prevent developers from retrospectively reducing or bailing out of approved affordable housing quotas. How many developments over the past 3 years have met the 40% affordable housing quota? A handful, if that. How many have respected the housing mix for one bed, 2 bed or the 35% for 3 beds? Again, Merton planners allow developers to do what they want, without applying the housing mix. The result currently is a flood of 1-2 bed developments, squeezing out families from Merton.
Homes for families need to be encouraged, replaced when demolished.

Other Sites:

Site Wi8

South Wimbledon Station

Morden Road, South Wimbledon

The site is highly visible, on a strategic corner and anything that is built above the station has to preserve its Grade I listing, not be tall, and respect the character and identity of that traditional junction of Victorian builds. The tube noise is already keeping residents in the Battles Area awake with noise and vibrations and the issue is still not sorted. How is building above going to offer good housing?

Site Wi2

Broadway Car Park

111-127 The Broadway , Wimbledon SW19

The development of the Broadway Car Park must be a seamless extension to the Grade II New Wimbledon Theatre that adjoins it to the west. I would like to see a design code for this area – not just term it as “sensitively designed.” The theatre is popular, very visible, and the car park well used currently. However, a development that extends the cultural/community use of the theatre,(music/drama/dance schools with performance space) with retail on the ground floor/café with green public space at the front would create a cohesive entity.

This part of the Broadway has suffered as a result of poor “vernacular” design. The theatre will stand for many more decades/centuries in comparison to current vernacular builds. We must build for longer than 30-40 years.

Site Wi5

Hartfield Car park (formerly P3)

42-64 Hartfield Road, Wimbledon SW19 3RG

It is time for the Council to deliver on its long-awaited promise to provide Wimbledon with a concert Hall and this site is perfect. World-renowned Frank Gehry has already drawn up some plans for a world class concert hall but there has to be a commitment from the Council to provide this site in order to allow for major funding for the scheme to take off.

Pls Remove Site ID : Mo3

Imperial Sports Ground, 0.47 hectares

Tooting and Mitcham Hub

Bishopsford Road,

Morden SM4 6BF

This site needs to be removed from residential development. Metropolitan Open Land must be respected, especially as a flood zone 3 for fluvial flooding and being in a critical drainage area. It needs to remain as a sporting facility for community use at Tooting and Mitcham Hub.

Given “high quality design” will be needed to complement such a sensitive area, Merton has yet to come up with this calibre design and further risks the compromising of the site. When such design is available or a design code is in place, the site could be reconsidered.

Site Mo4

Morden Regeneration Zone, Morden

Whilst I welcome regeneration in Morden and the subsequent sentiment in the site’s strategic planning factors, the wording is too general, weak and of concern:

“Height and density is to be appropriate, design-led and of a high quality design throughout the site.”

- *What is appropriate height? This area should be low to medium rise (4-6 floors) and less than 22 metres including plant room. The sight of the current Council Civic Centre building looming in the horizon from Morden Park Hall is ugly and disrupts the views of a protected conservation area. Having more tall buildings will destroy what is precious and could make Morden a proper destination.*

“Respecting the character and the views to and from the adjacent Wandle Valley conservation area and Morden Hall Park which is a Registered Park of Historic Interest (by Historic England) containing a range of. Grade II listed assets.

This hasn’t happened in spite of the designation as the Council building juts into the skyline from Morden Park Hall. What will now change?

“Improving air quality along London Road” –

Without clear, binding, air quality policies weaved into design of the buildings and the traffic management, this term “improving air quality” will remain just that – words. The policies governing air quality in the local plan are so feeble, they might as well not be included. It absolves developers from acting, and rather “exploring” without any concrete results to see.

Site RP9

Merton Adult Education Centre

Whatley Avenue, Raynes Park SW20 9 NS

Consultees suggested use: Residential once Education use is declared surplus – suggested by the London Borough of Merton.

Wedging residential between the two primary school buildings is unneighbourly and causes overlooking, noise, safeguarding issues. At what point will the Council declare a surplus of primary and/or secondary schools when need comes in waves? Should schools be shut down because there is a current drop in primary school demand, despite a year ago, Merton Council arguing there was a hike and hence a need for school places? The wording leaves a loophole gaping for wide interpretation of “need.”

This site needs to be kept for community/education, with residential removed from the site allocation. If there is to be residential, family homes NOT large blocks

are to be built on that site. There is a dearth of houses with Merton Council forging ahead with 1-2 bed rooms in blocks of flats.

I would appreciate being kept informed of any future consultations.

Yours sincerely,