

25/01/2019 16:39

Dear Tara,

Further to our earlier representations on the Draft Merton Local Plan, the London Borough of Sutton has a further three comments to make on the Transport section.

### **1. Policy T6.5d**

The London Borough of Sutton supports the reference to "the enhancement of existing pedestrian and cycle routes/networks, including the Wandle Trail." The council looks forward to continued cross-border co-operation to ensure the delivery of this important ecological and recreational asset in south London.

### **2. Policy T6.8**

The London of Sutton welcomes the reference to Sutton Link in Paragraph 6.8.4. However, given that it is such an important piece of future transport infrastructure , the council considers that Sutton Link should be referenced within Policy T6.8 itself. This would give the Sutton Link scheme increased weight in the determination of planning applications and ensure that routes are properly safeguarded.

### **3. Map of Future Transport Infrastructure Improvements**

The London Borough of Sutton welcomes the inclusion of the Sutton Link route on this map and notes that the route shown is also the London Borough of Sutton's preferred route option (Route Option 1).

Best wishes with your further work on the plan.

Regards,

**Duncan Clarke MRTPI**  
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**LB SUTTON CONSULTATION COMMENTS ON MERTON DRAFT LOCAL PLAN (STAGE 2) – 4 JANUARY 2019**

Ref.	Item	LBS Comment
<b>The Vision and Strategic Objectives</b>		
'Points of Interest in Merton' Map	Depiction of Wandle Valley Regional Park on Map	The Wandle Valley Regional Park is currently shown only as a linear route along the length of the River Wandle and does not fully reflect its wider strategic significance both within south London and as part of the Mayor's green grid. It is therefore recommended that the Map be adjusted to more accurately depict the full extent of the Wandle Valley Regional Park within the boundaries of LB Merton and its cross-boundary relationship with neighbouring segments of the Wandle Valley Regional Park within LB Sutton and Wandsworth.
Spatial Vision Para 1.21, 2 <sup>nd</sup> sentence	<i>"1.21 The Sutton Link will provide a reliable rapid transit service from Sutton to Merton and Crossrail2 will be close to completion, helping Merton's residents and students to access the jobs and services they need, helping staff and customers for Merton's businesses to access Merton quickly and efficiently and making Merton more easily accessible for visitors and tourists."</i>	The London Borough of Sutton supports the reference to Sutton Link in the Local Plan and looks forward to continuing to work with the London Borough of Merton to deliver this important piece of transport infrastructure. However, in Paragraph 1.21, the council would welcome Merton's commitment to a tram being preferable to a bus for the rapid transit service.

Ref.	Item	LBS Comment
Spatial Vision Para 1.24, 1 <sup>st</sup> sentence	<i>“1.23 At least 6,200 new homes will have been built by 2036 in Merton and 40% of these are affordable”</i>	<p>The London Borough of Sutton notes that the proposed 15-year housing target for Merton translates to an annual target of 413 net additional dwellings. This is approximately in line with Merton’s minimum housing target of 411 in the current London Plan 2016.</p>
		<p>Even before any consideration is given to the draft London Plan target of 13,280 net additional dwellings over 10 years (1,328 per annum) and the requirement under Paragraph 60 of the NPPF 2018 that housing targets be <i>“informed by a local housing need assessment, conducted using the standard method in national planning guidance”</i>, the council believes that the proposed target is too low and at variance with Policy 3.3 of the current London Plan 2016 which states that:</p>
		<p><i>“(D) Boroughs should seek to achieve <u>and exceed</u> the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.</i></p>
		<p><i>(Da) Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, <u>augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF”</u></i></p>
<p>As well as the fact that the proposed target fails to meet the requirements of the current London Plan and the new NPPF, the council does not consider that the justification set out in paragraphs 4.2.1-4.2.14 under Policy H4.2b is sound (see further comments below).</p>		
<p>This sentence relates to the provision of affordable housing within the whole of the borough over the plan period and therefore does not fit in with the rest of paragraphs 1.23 and 1.24 which relate specifically to South Wimbledon and Mitcham. We therefore recommend that this sentence be moved to the introductory part of the spatial vision.</p>		
<p>The 40% affordable housing target quoted here is inconsistent with the 50% target set out later in the draft local Plan under in Part (e) of Strategic Policy H4.1: Housing choice.</p>		

Ref.	Item	LBS Comment
Spatial Vision Paras 1.23 and 1.24-1.26	Spatial Vision for <b>South Wimbledon and Mitcham/ Future Wimbledon</b> (whole section)	The Spatial Vision relating to the Wimbledon/ South Wimbledon areas should recognise the importance of the proposed tram (Sutton Link) extension in providing an enhanced strategic transport link to Sutton Town centre and beyond and in supporting housing growth within south London. This should be set in the context of Crossrail 2 and the Mayor's emerging Strategic Infrastructure Priorities in the Draft London Plan. Redevelopment proposals should continue to allow for tram routing and facilitate interchange from Crossrail 2
Spatial Vision Para 1.30, Sentences 1 and 2	<i>"1.30. <b>Tackling climate change</b>, and the effects of climate change remains at the heart of Merton's planning policies. Far more homes and businesses in Merton are resilient to the changes in energy prices as all new developments have maximised their potential for insulation and solar panels."</i>	<p>The London Borough of Sutton supports Merton's overall intention to tackle climate change and its impacts. However the wording of this paragraph should not lose sight of the key imperative which is to reduce CO<sub>2</sub> emissions from new and existing developments.</p> <p>If Merton already has longer-term corporate ambitions in terms of achieving 'zero carbon' standards (either just for new developments or borough-wide), these should be reflected in the Spatial Vision. While the new London Plan has yet to be adopted, it is also likely that the Merton Local Plan will need to respond to the Mayor's ambition for London to become a 'zero carbon city'</p> <p>The stated intention for new developments to 'maximise their potential for insulation and solar panels' does not adequately capture the full scope of issues which will need to be addressed in achieving a transformation towards a low-carbon economy.</p> <p>We support the aim of retrofitting the streetscene with SuDS measures to store and slow down runoff (but the word 'summer' is superfluous since extreme rainfall can occur at any time of the year). However, we would recommend that other important climate change adaptation issues are acknowledged such as the need for new developments to address overheating and the urban heat island (UHI) effect through green infrastructure and other design measures and the need to promote water efficiency etc</p>
<b>Strategic Objectives</b>		
Strategic Objectives 1-6	<b>Strategic Objectives 1-6</b> <b>1. Healthy Places;</b> <b>2. Place;</b>	The strategic objectives set out under these six headings are supported. However we would suggest that the following issues are also covered in the wording of these objectives:

Ref.	Item	LBS Comment
	<b>3. Housing</b> <b>4. Environment</b> <b>5. Infrastructure</b> <b>6. Economy</b>	<ul style="list-style-type: none"> <li>• promoting the tram (Sutton Link) extension;</li> <li>• promoting affordable housing;</li> <li>• the balance to be sought between family housing and small flats,</li> <li>• promoting urban greening measures as part of the design and layout of new developments and urban renewal schemes.</li> </ul> <p>While the aim of developing a 'low carbon economy' is mentioned in the introductory paragraph under 'Environment', none of the objectives describes how this will be pursued apart from through promoting sustainable waste management.</p>
<b>Chapter 2: Health and well-being</b>		
Policy HW2.1, Page 2-2	<b>Strategic Policy HW2.1: Health and wellbeing</b>	The London Borough of Sutton supports this policy.
Policy HW2.1, Page 2-2	<b>Policy HW2.2: Delivering healthy places</b>	The London Borough of Sutton supports this policy.
<b>Chapter 3:Our Places</b>		
Wimbledon South Wimbledon	General comment	The London Borough of Sutton is concerned that the proposed tram (Sutton Link) extension are mentioned in either the 'Wimbledon' or 'South Wimbledon' sections. As set out above, the council consider the tram (Sutton Link) extension as essential to support future housing and employment growth within the London Borough of Sutton and at the London Cancer Hub.
<b>Chapter 4: Housing</b>		
Policy H4.1(e) Page 4-23	<b>Strategic Policy H4.1: Housing choice</b> <b>(e) Aim for 50% of new homes built in Merton between 2020-2035 to be affordable</b>	While the London Borough of Sutton supports this aim, the 50% target in Policy H4.1 is inconsistent with the 40% target set out in the 1 <sup>st</sup> sentence of paragraph 1.23
Policy H4.1(b), Page 4-9	<b>Strategic Policy H4.2: Housing provision</b> <b>(b) Work with housing providers to facilitate the provision of a minimum of 6,165 additional homes for the period 2020 – 2035</b>	<p>The London Borough of Sutton notes that the proposed 15-year housing target for Merton translates to 413 net additional dwellings per annum. This is approximately in line with Merton's minimum target of 411 in the current London Plan 2016.</p> <p>Even before any consideration is given to the draft London Plan target of 13,280 net additional dwellings over 10 years (1,328 per annum) and the</p>

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		<p>requirement under Para 60 of the NPPF 2018 that housing targets be “informed by a local housing need assessment, conducted using the standard method in national planning guidance”, the proposed target is too low and at variance with Policy 3.3 of the London which states that:</p> <p><i>(D) Boroughs should seek to achieve <u>and exceed</u> the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.</i></p> <p><i>(Da) Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, <u>augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF</u></i></p> <p>Also, the council does not consider that the arguments set out in paragraphs 4.1.3-4.2.14 provide a sound basis for setting the lowest possible 15-year target of 6,165 net additional dwellings for the reasons set out below.</p>
<p>Policy H4.6 and Para. 4.6.1</p>	<p><b>Policy H4.6: Accommodation for Gypsies and Travellers</b>  <i>“4.6.1 A new Gypsies and Travellers Needs Assessment is currently being prepared, which will identify what the current needs are and indications on how any identified needs will be addressed over the plan period”.</i></p>	<p>Policy H4.6 as currently drafted does not identify any additional deliverable sites within LB Merton to meet the accommodation needs of Gypsies and Travellers over the plan period as required under NPPF Para. 61 nor does it identify a five-year supply as required in NPPF Para. 73 and the government’s ‘Annex 1 to Planning Policy for Traveller Sites’.</p> <p>In preparing the updated Gypsies and Travellers Needs Assessment for Merton, the London Borough of Sutton would recommend that:</p> <ul style="list-style-type: none"> <li>• the assessment is completed and deliverable sites identified in the wording of Policy H4.6 prior to the adoption of the Merton Local Plan;</li> <li>•</li> <li>• a ‘plan, monitor and manage approach’ is appropriate because it is an approach used in London.</li> </ul>

Ref.	Item	LBS Comment
<b>Chapter 5 Design – No comments</b>		
<b>Chapter 6: Infrastructure</b>		
Chapter 6: Infrastructure	<b>General comment</b>	This chapter does not provide a very clear picture of the future social and community infrastructure needs of the borough over the plan period (e.g. primary and secondary schools) in order to serve anticipated population growth. It may therefore be advisable to undertake a borough infrastructure study as part of the next stage of the Local Plan review in order to ensure that the policies set out in this chapter are sound
<b>Chapter 7: Economy</b>		
Policy Ec 7.2 and Paras 7.2.13- 7.2.20, Pages 7.9 to 7.15	<b>Policy Ec 7.2: Employment areas in Merton and Paras 7.2.13-7.2.20</b>	<p>While the London Borough of Sutton would support many of the policy objectives set out in this chapter, such as safeguarding existing employment sites for industrial uses, the council notes that no borough assessment of industrial land demand within the London Borough of Merton has been undertaken as part of the Local Plan evidence base. It is recommended that this is undertaken in line with the NPPF and the Government’s planning practice guidance as the basis for identifying how much land is likely to be needed to accommodate B1(b), B1(c), B2, B8 or other appropriate SG uses over the plan period.</p> <p>The London Industrial Land Demand Study prepared by CAG consultants on behalf of the GLA in October 2017 identifies that LB Merton forms part of the Wandle Valley sub-regional property market area and that there is a positive net demand over the five neighbouring boroughs of Croydon, Kingston, Merton, Sutton and Wandsworth (this is derived from the combined ‘baseline net release’ of +8.8 ha). Furthermore, the study states that <i>“Where one Borough has a positive demand for industrial land and a neighbouring borough has a surplus of land to release, then there should be some reallocation between boroughs to ensure demand is met at the property market level” (Para 5, Page 213)</i></p>
All	Whole chapter	This chapter should address how the Local Plan will promote the ‘low carbon’ economy since this is set out in the spatial vision and look at how the intensification of uses within industrial areas can contribute to meeting demand for employment floorspace; facilitate the development of complementary uses and the ‘circular economy and minimise traffic generation. The London Industrial Land Demand Study 2017

Ref.	Item	LBS Comment
		recommends that all boroughs should be promoting intensification of uses.
<b>Chapter 7: Town Centres</b>		
<b>All</b>	Whole chapter	No retail assessment study has been carried out in order to assess the likely future demand for additional gross floorspace for retail uses, offices; and restaurants, cafes and other food/ beverage outlets. This should therefore be undertaken to inform the policies set out in this chapter.
	Whole chapter	The London Borough of Sutton is concerned that no mention is made within this chapter of the proposed tram (Sutton Link) extension from Wimbledon/ South Wimbledon to Sutton Town Centre.
<b>Chapter 8: Environment</b>		
<b>Section: Open Space, Green Infrastructure and Nature Conservation</b>		
<b>Strategic Policy O8.1, Part (g),</b> Page 8-3	<b>Strategic Policy O8.1: Open Space, Green Infrastructure and Nature Conservation</b>  <b>(g) Working with partners to develop and implement proposals for the Wandle Valley Regional Park;</b>	The London Borough of Sutton welcomes the stated intention to “work with partners to develop and implement proposals for the Wandle Valley Regional Park” and note that LB Sutton will continue do likewise to promote the wider cross-boundary benefits of this strategic link within the context of the south London sub-region and the Mayor’s green grid.
<b>Managing Flood Risk and Sustainable drainage - No comments</b>		
<b>Section 8.10 Climate Change – No comments</b>		