



Date: 8th January 2018

Commercial Development

Transport for London
3rd Floor Wing Over Station
55 Broadway
London
SW1H 0BD

By email

Phone: 020 7126 4468
Email: jonathanwoolmer@tfl.gov.uk

Dear Sir/Madam,

RE: Merton Local Plan 2020, 1st stage consultation

Thank you for consulting Transport for London (TfL) on the London Borough of Merton's draft Local Plan 2020. The following comments represent the views of officers in TfL Commercial Development Planning Team (TfL CD) in its capacity as a significant landowner and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London.

TfL CD has been set an ambitious target by the Mayor to commence the development of 10,000 new homes in London by 2021; at least 50% of these new homes must be genuinely affordable. TfL CD has identified a number of sites in the borough for residential led, mixed-use development which will make a significant contribution towards meeting borough and TfL housing targets, as well as improved public transport infrastructure.

Our representations in respect of the Call for Sites and the various topics set out in your consultation are set out below.

Call for Sites

1. Morden Town Centre

Morden has been identified as one of the major growth and housing opportunity areas in south west London by the Mayor of London, TfL and the London Borough of Merton (LBM). There are currently a series of adopted documents which together establish the regeneration context of Morden town centre and specific sites within it. These include the 2009 Vision for Morden, the 2014 Morden Station Planning Brief, 2014 Site Allocations Local Plan and the 2015 designation of Morden Town Centre as a Housing Zone.

TfL are a substantial landowner within Morden town centre, and have identified land assets within this area as having the potential to deliver a substantial amount of development. LBM is also a substantial landowner with Morden Town Centre. Both organisations have been working together to identify the feasibility of potential aggregation of land assets to enable wider comprehensive regeneration proposals.

It will be critical for the Local Plan 2020 to build upon the above body of work and establish a strong and robust policy framework in which to facilitate effective regeneration of the entire Morden town centre. Whilst we set out below the sites within TfL's ownership, we consider that the entire town centre should be covered by a site specific allocation and policy/set of policies, setting out clearly the

parameters for regeneration. This should be based upon a set of properly informed masterplanning principles that will need to be developed and consulted upon over the course of the plan preparation. This does not necessarily mean that all buildings/sites within the town centre would be redeveloped, however it is important that the study area includes the entire town centre so that a fully informed set of masterplan principles can be developed, including the possibility for the inclusion of areas that could come forwards as later phases in the future. We suggest therefore that the entire 2015 draft consultation boundary is used as the basis for this. We attach a copy of this plan with this letter.

TfL Owned Sites

TfL own a range of sites in and around the town centre which are suitable and available for development. These sites benefit from existing allocations within the 2014 Local Plan:

2. Morden Station, Morden Station Offices and Retail Units, Morden Station Surface Car Park and Sainsbury's (Peel House) Car Park: Site Area 2.11ha.

Morden Station Offices and Retail Units, Morden Station Surface Car Park and Sainsbury's (Peel House) Car Park each benefit from existing site allocations within the 2014 Local Plan. TfL consider that the entire site including the three existing site allocations and the Underground Station should be included as a single allocation. These parcels of land together measure 2.11ha and comprise the landownings outlined in red on attached plan DEV069. This will enable the consideration of the regeneration of the site as part of a wider comprehensive masterplanning exercise to provide a range of uses including residential, retail and community uses. The London Underground operational assets will need to be safeguarded, although there could be scope for the consolidation of uses to allow a more efficient use of the site.

3. York Close Car Park: Site Area 0.66ha

York Close Car Park benefits from an existing site allocation within the 2014 Local Plan. TfL CD consider that the site should be included as part of a wider masterplanning exercise of Morden Town Centre. As the site has a more peripheral location than the sites at the Underground Station, we consider that residential would be the most appropriate use. An up to date land ownership plan with the site outlined in red (site sub reference MEL010.02) is attached (plan ref: MEL010).

4. Morden Depot: Site Area 5.64ha

This site comprises a 5.64ha parcel of land, currently in use as a London Underground operational facility along with an ancillary parcel of land to the north. However it is included within the Morden Town Centre consultation boundary, and represents a large piece of brownfield land in an accessible location. TfL have identified the future extension to explore options to reconfigure the site in a more efficient manner to enable redevelopment of parts of the site. Should this be feasible in the future, the site could have the potential to deliver a substantial amount of development, subject to the safeguarding of the operational facilities. An up to date land ownership plan with the site outlined in red (site sub ref: MEL010 & MEL 010.03) is attached (plan ref: MEL010).

Other sites

5. South Wimbledon Station and 1-7 Morden Road. Site Area 0.2 ha

This site comprises the Grade II Listed station and adjacent commercial premises. The site is available, developable and deliverable for residential or mixed use development, subject to feasibility studies (taking into account the listed nature of the station). Please see attached plan STA988.

6. Colliers Wood Station and 2-24 Christchurch Road. Site Area 0.15ha

This site comprises the Grade II Listed station and adjacent commercial premises. The site is available, developable and deliverable for residential or mixed use development, subject to feasibility studies (taking into account the listed nature of the station). Please see attached plan NEW128.

General Comments regarding questionnaires

At this stage, the consultation is made up of thirteen surveys which aim to gather ideas that will help to shape the planning policies. Our comments regarding these surveys where relevant are set out below:

Morden

As set out above, Morden has been identified as one of the major growth and housing opportunity areas in south west London. TfL CD are committed to investing in significant regeneration through intensified development. With respect to this, TfL CD strongly supports each of the strategic proposals for Morden town centre. In particular these are supported by draft London Plan Policy GG2 which sets out that those involved in planning and development should proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting high density development, particularly on sites that are well connected by public transport. Considering this, taken with the designation of the town centre as a housing zone TfL CD would suggest that site specific policies for Morden town centre strongly advocate high density development in order to intensify the use of the land at this key location.

Affordable Housing

TfL CD supports the 'fast track route' set out in the Mayor of London's Affordable Housing and Viability SPG (2017). We would note however, that the SPG sets out that where a public landowner has an agreement in place with the Mayor to provide 50% affordable homes across a portfolio of sites, individual sites which meet or exceed the 35% affordable housing threshold and required tenure split may be considered under the fast track route (para 2.34).

Diversifying the Housing Market

TfL CD supports the provision of Build to Rent as a model of housing that can deliver high quality homes for rent quickly. London Plan Policy 3.8 sets out that boroughs should ensure that practical support to sustain the contribution of PRS, whilst the draft London Plan Policy SD6 sets out that the particular suitability of town centres for Build to Rent. We therefore consider that policies should follow this approach and set out that town centres are suitable locations for Build to Rent products.

TfL CD supports the use of precision manufactured homes, which can increase the rate of building and assist in speeding up housing supply. This is in line with the London Housing Strategy which supports greater use of precision manufacturing in building homes across London. In line with the above we suggest that policies advocate for the provision of high quality precision manufactured homes within the borough.

Housing Growth

TfL CD supports the overall approach to concentrate tall buildings in places where there are already tall buildings such as the centres at Morden and South Wimbledon, intensification around tram stops and rail stations and supporting high density developments. We suggest that policies set out to robustly promote high density development at all key places identified for growth such as town centres, transport hubs, housing zones and site allocation. This is in line with the draft London Plan which requires Local Authorities to intensify the use of land to promote higher density development (draft Policy GG2).

We trust that the above and the enclosed is in order, and would appreciate if you could confirm receipt of this letter. Should you have any queries, please do not hesitate to call me on 020 7126 4468.

Yours sincerely

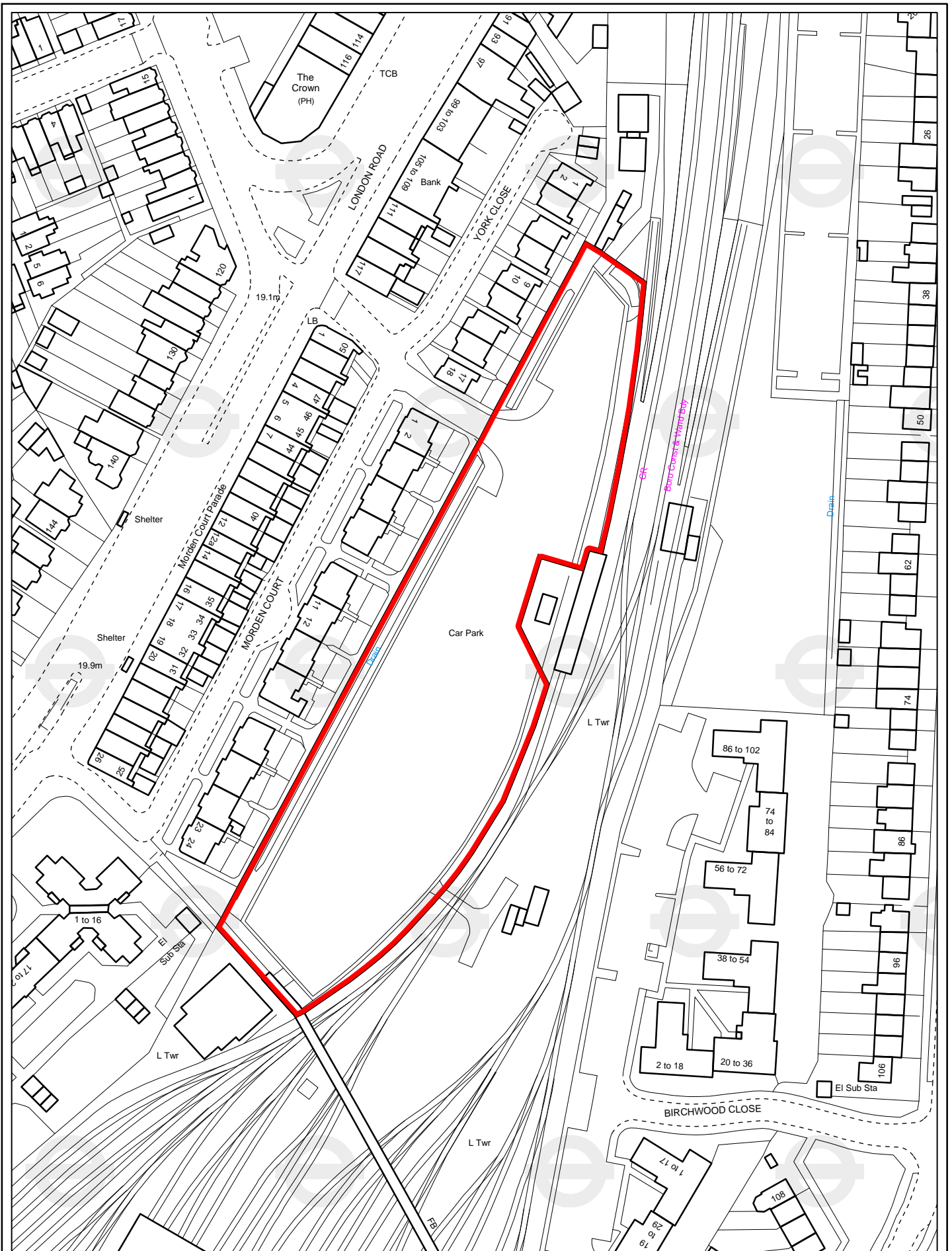
Jonathan Woolmer

Principal Planner, Commercial Development

Cc:

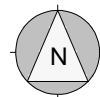
Patricia Cazes-Potgieter, Planning Development Manager, Commercial Development

Derek Wilson, Development Manager, Property Development



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**Car Park
 behind
 Morden Court and York Close**



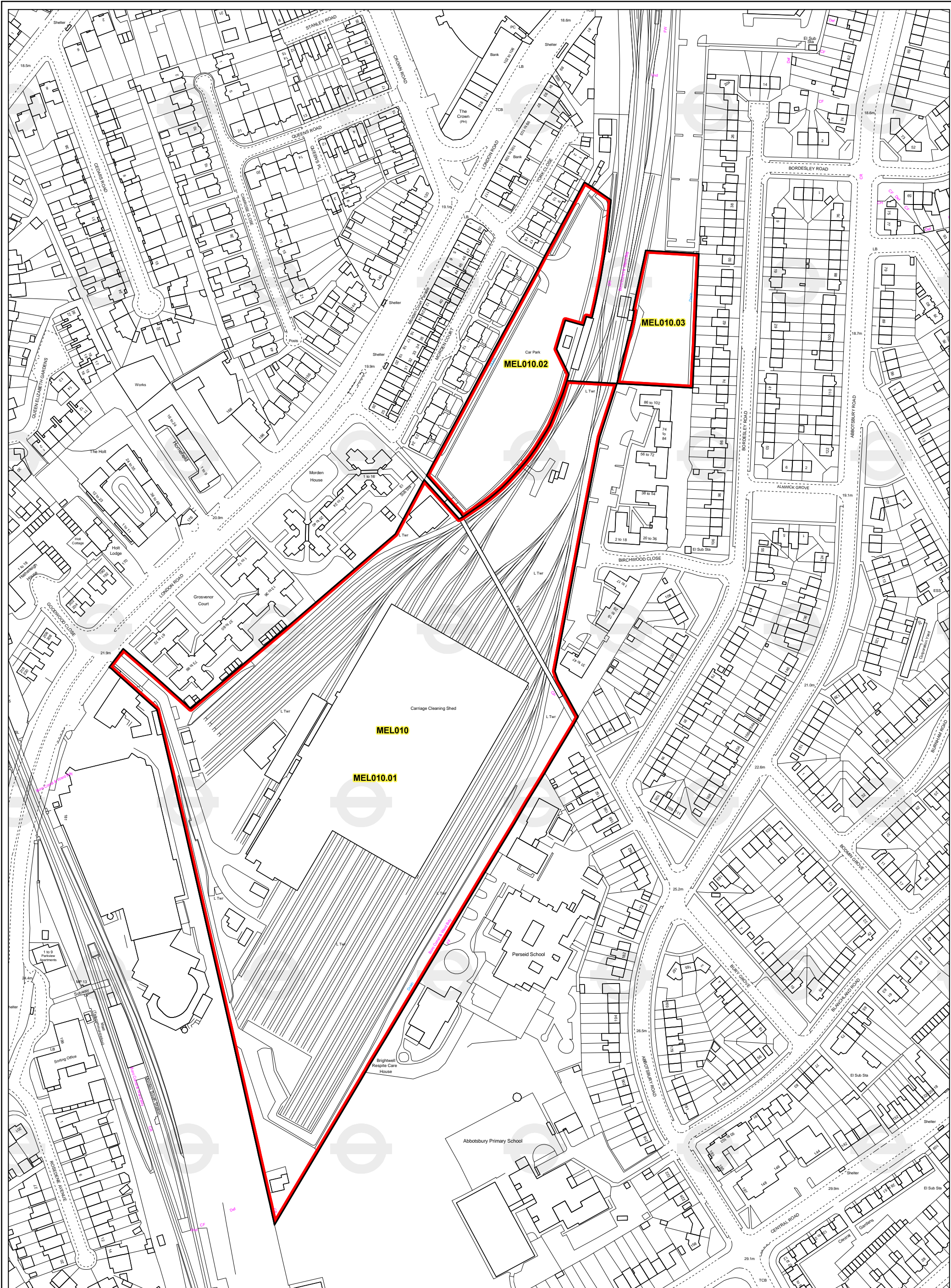
A4 Portrait

Date : Jan 2018

Initial : REM

File : PAR

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MEL010



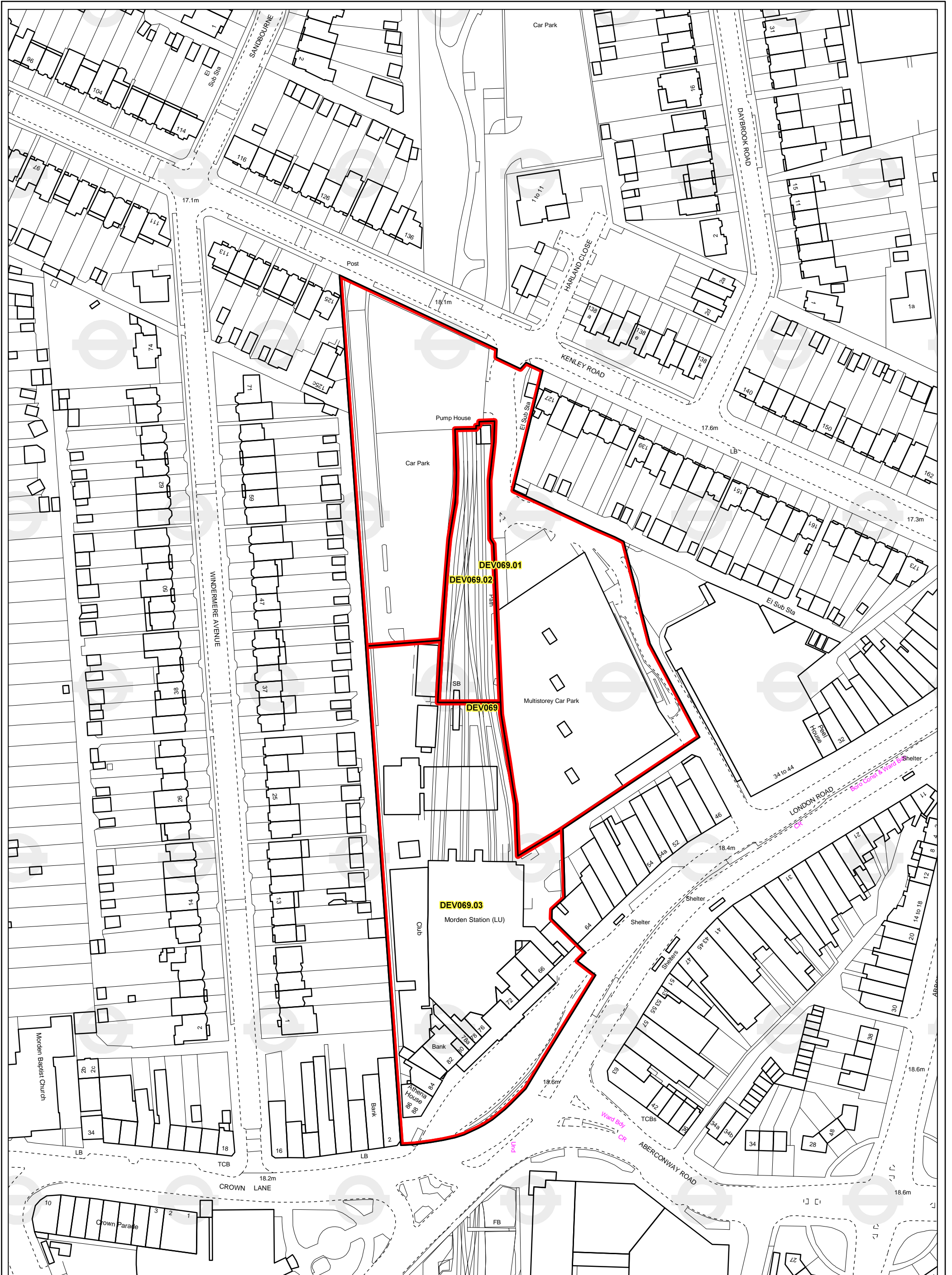
A3 Portrait

Date : Dec 2015

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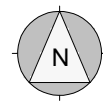
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DEV069



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A3 Portrait

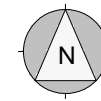
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Land at South Wimbledon



A4 Landscape

Date : Jan 2018

Initial : REM

File : PAR

Scale : 1/1250 at A4

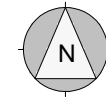




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Land at Colliers Wood



A4 Landscape

Date : Jan 2018

Initial : REM

File : PAR

Scale : 1/1250 at A4

