

## **Merton Priory Homes Response to London Borough of Merton Sites and Policies Plan Consultation**

Merton Priory Homes (MPH) welcomes the Council's Sites and Policies Plan and Policies Map as well considered and thorough.

As a substantial landlord within Merton, MPH has an important stake in future development in the area. MPH also has some significant estates in the Borough with the potential for major regeneration to address long-term structural and social issues.

We believe that the latest draft policy is in line with the desire of MPH to achieve high quality, sustainable environments in which households will flourish and where there is greatest potential to enhance the life chances of our residents.

With regard to specific areas within the document, we have a few comments as follows: -

### DM R1: Location and scale of development in Merton's town centres and neighbourhood parades

We note in item c) of the Policy the Council's proposed flexibility in applying the policy on amalgamation of existing units in Wimbledon, Colliers Wood and Wimbledon Village where such flexibility contributes to the council's regeneration objectives and trust that the regeneration proposals affecting MPH will also be treated sympathetically.

### DM R4: Protection of shopping facilities within designated shopping frontages

We welcome the proposed flexibility in shop front designations proposed at item 1.52 to cope more effectively with changes to the economy and shopping habits.

### DM R5: Food and drink/leisure and entertainment uses

We welcome the balanced approach taken by the Council in this section, in the following initiatives: -

- proposing opportunities for additional health club facilities in line with population growth (1.76)
- the encouragement of restaurants, cafes, leisure and entertainment uses in areas where these are in short supply (1.77)
- and the proposed restriction of concentrations of hot-food takeaways and promotion of healthier food options.

We are particularly keen to see effective initiatives to promote healthy lifestyles available to residents in the poorer parts of the Borough. We also support the maintenance of existing leisure and entertainment facilities in Colliers Wood, Mitcham and Morden town centres (1.92)

### DM R6: Culture, arts and tourism development

We note and support the Council's proposal to encourage arts, culture and tourism uses in the Merton economy and welcome the value this could add to the local economy and employment prospects for local people.

## 2. Housing (page 47) – Accommodation needs of gypsies, travellers and travelling showpeople

MPH acknowledges our partnership with the Council in meeting the needs outlined in this section and we look forward to continuing this work.

### DM H1: Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.

We note the contents of this section and look forward to working with the Council to assist in meeting identified needs for supported housing in Merton. The ongoing revenue funding for this provision will need to be considered to ensure proposed supported housing project remain viable in the long term.

### DM H2 Housing Mix.

We note the Borough level indicative proportions with regard to housing mix in clause 2.34 and that clause 2.36 provides for some flexibility in the implementation of the proportions though putting the onus on developers to demonstrate why exceptions might be required. On potential regeneration sites, unit sizes will be governed largely by the needs of existing residents who will have the right to be re-housed on the estate. We trust that the Council will consider these as satisfactory grounds on which to grant exceptions to the proportions in 2.34.

### DM H3 Support for Affordable Housing

We note that in item 2.42 there is a requirement that average rent levels across all bed sizes for affordable rent tenure on a scheme should be no greater than 65% unless registered providers can demonstrate exceptional circumstances. We also note the Council's proposed policy that affordable rents should in any case not exceed 65% of market rent for larger homes with three or more bedrooms. MPH's position is to set affordable rent levels at 65% of market rent. This is based on the results of research into affordability across London. However, MPH would wish to retain the right to review and amend rent level percentages in the future, in the light of varying market conditions.

### DM C2 Education for children and young people

MPH acknowledges the importance of ensuring that the educational needs of children are properly catered for where larger strategic developments are proposed that result in a substantial net increase in the need for school places.

### DM E3: Protection of scattered employment sites

We endorse the Council's policy to ensure there is a diverse mix of size, type, tenure and location of employment facilities, which can support a range of employment opportunities towards creating balanced mixed-use neighbourhoods. We see the creation and sustainment of local employment opportunities in the Borough as key in our aim to enhance the life chances for our residents, particularly for those in poorer parts of the Borough (4.37).

#### DM E4: Local employment opportunities

As for item E3, we are supportive of initiatives that provide more employment initiatives in the Borough and particularly those that provide opportunities for training and apprenticeships that lead to meaningful and worthwhile long term employment for local residents. MPH looks forward to continuing the existing fruitful relationship with the Local Strategic Partnership in encouraging employment initiatives.

#### 6. Design

We note and endorse the Council's aspiration for high quality design of buildings and places in the borough. We consider this an essential factor in creating sustainable communities for current and future generations.

#### 7. Environmental Protection

MPH is supportive in principal of decentralised energy systems. However, any new developments can only be attached to the decentralised energy networks if there is surety that the well known issues with combined heat and power systems have been resolved. Issues include design and infrastructure to support the systems; monitoring, metering and billing issues; support for securing low tariffs; support for ensuring the maintenance costs associated with the systems are reasonable. MPH would like to see the Council's proposals recognising that the decentralised energy networks can only be utilised once the infrastructure and support for energy supply meets standards that benefit all householders. MPH will always want to install a system which balances low carbon with affordability and ease of use.

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