

**Statement of Consultation
Submission**

Sites and Policies Plan and Policies Map

September 2013
London Borough of Merton

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1 Introduction

- 1.1 This document sets out how the London Borough of Merton complied with the consultation requirements of Merton's Statement of Community Involvement (SCI) 2005 and the Regulations (The Town and Country Planning (Local Development) (England) (Amended) Regulations 2008) by engaging, involving and consulting with the local community, residents groups/organisation and stakeholders during the preparation of the Sites & Polices and Polices Map (part of Merton's Local Plan).
- 1.2 Regulation 30(d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 requires the local authorities to prepare a Statement of Consultation setting out:
- I. which bodies and persons the local planning authority were invited to make representations under regulation 25 or regulation 26,
 - II. how those bodies and persons were invited to make representations under either of those regulations,
 - III. a summary of the main issues raised by the representations made
 - IV. pursuant to either of those regulations, and
 - V. How any representations made pursuant to either of those regulations have been taken into account.
- 1.3 The Statement of Consultation will assist the Inspector at the Examination in Public to determining whether the Council's Submission Sites and Polices plan; and Polices Map complies with the minimum requirements for involvement and government guidance.

Merton's Statement of Consultation (SCI)

- 1.4 Merton's Statement of Community Involvement (SCI) was adopted in 2006 and describes how the community can be involved in preparing Merton's Local Plan.
- 1.5 The SCI is part of the Local Plan and sets out the council's commitment to community involvement in planning. It explains how Merton's local communities, residents groups/organisation, stake holders and other interested parties can be involved in developing planning documents, by informing the Council what they thought, provide additional information and suggest changes to polices/plan. The SCI .also shows how different Local Plan documents will be prepared and how the Council will notify the public about them.
- 1.6 Some issues raised in the SCI have changed since the SCI was adopted in 2006. For example the council now has a Facebook and Twitter page which is used as an additional method of alerting people to new press releases. Another example is that the council no longer has a dedicated community engagement officer for planning matters but uses all officers involved in plan-

making to conduct outreach consultation. These are not considered to be significant changes to the principles of the SCI.

1.7 The following table outlines the methods of consultation identified in the SCI and the methods of consultation that were utilised during the various consultation stages of the Sites and Policies Plan and Policies Map. .

1.8 This statement reports on the engagement during the consultation stages, feedback from the public and the steps the Council took following the feedback; before submission of the Sites and Policies Plan; and Policies Map to the Secretary of State in 2013..

Summary of consultations undertaken

1.9 Since 2011, Merton council has been engaging with local residents, resident's groups/organisations, developer, land owners, key stakeholders and other interested parties.

Stage 1: "call for sites" (July-September 2011)

1.10 This stage was initial public consultation to ask people and organisations to suggest sites for allocation, policy issues and land designations. Following this consultation, officers assessed the responses and carried out research to inform the council's preferred options for the sites submitted, drafted new detailed planning policies and land designations. The council's "preferred options" for detailed planning policies, potential sites and land designations were published for comment between January and April 2012.

Stage 2: 'Planning ahead: draft Sites and Policies Plan; and Policies Map (Formally Proposal Map), preferred options" (January-March 2012, extended into May 2012)

1.11 This public consultation gave residents, landowners, community groups and other interested parties the opportunity to comment on the council's preferred options for 20 detailed planning policies, approximately 50 sites and land designations. A large range and number of comments were received from residents, landowners, community groups and other interested parties. As part of these comments, an additional 15 sites were suggested by landowners, councillors and other interested parties. We have assessed these sites and these are published as Stage 2a.

Stage 2a - "additional sites and policies and Proposals Map: preferred options continued" (June-July 2012)

1.12 This consultation gives residents, landowners, community groups and other interested parties an opportunity to have their say on three new detailed planning policies, 15 additional sites that were suggested by people and organisations at Stage 2 and some Proposals Map designations. This consultation is a continuation of the Stage 2 “preferred options” for the Sites and Policies Plan and Policies Map.

1.13 This consultation was co-ordinated to the same timescales as the draft planning brief for the Rainbow Industrial Estate in Raynes Park.

Stage 3 - “Towards a final plan: draft Sites and Policies Plan and draft Policies Map (January – February 2013).

1.14 this consultation was essentially a draft of the final plan, amended from feedback received during the previous seven months of public consultation. It brought together all of the potential sites from stages 2 and 2a, together with the draft planning policies and land designations into one document.

1.15 Stage 3 was an additional two months of consultation (not required by statute) in order to ensure that people and organisations had their chance to respond to a draft of the final plan.

Stage 4 pre-submission Sites and Policies; and Policies Map (July – August 2013)

1.16 This consultation gave the public, key stake holders and other interested parties a final opportunity to comment on any issues within the detailed policies, site allocations or land designations that they would like the inspector to consider at the examination of the plan. Furthermore, the public was informed of the opportunity attend the inspector hearings and were informed to notify the council if they wished to attend.

How we consulted

1.17 During all stages of consultation for the Sites and Policies Plan; and Policies Map, the council used different methods of public engagement and consultation to maximise public involvement and raise public awareness of the Sites and Policies Plan; and Policies Map. These consultation methods included:

- Resident Groups/Organisation/Civic Groups/ meetings
- One-to-One Meetings with Selected Stakeholders
- Steering and Advisory Groups
- Access to the document(s) at Merton’s reference libraries
- Formal written consultation notification letters and emails to people and organisations who were involved locally or had asked to be involved (database of approximately 1700 sent at each consultation stage)
- Dedicated webpage on Merton Council website (update at various intervals)
- Responses and comments submitted made available on the councils dedicated website.

- Notices and articles in trade publications
- Public notice in the borough's local newspapers

1.18 More details about the range of consultation methods used are set out below.

Stage 1: “call for sites” (July-September 2011)

| Consultation methods advised in Merton’s adopted SCI 2006 | Consultation methods used |
|---|---|
| Press release: local / trade press | A local advertisement was placed in Wimbledon and Morden and Mitcham Local Guardian newspaper on the 14 th July 2011. A press release was issued for the local and trade press |
| Council website or associated / relevant websites. | Details of the consultation was placed on the Council’s public accessible ‘Get involved’ consultation portal, explaining what the consultation what about, how to submit comments with contact email address and telephone if there was any questions. A dedicated ‘Call for sites’ website launched at the start of the consultation with information of the consultation and the questionnaire available to download from the website. |
| Leaflets on specific Local Plan topics | The Council produced leaflets / questionnaires for the public, land owners/developers and other interested parties to suggest site(s) and land allocation for sites(s) in Merton |
| Outreach | Meetings were held with the following groups :Wimbledon Society (11 July 2011) and various landowners throughout the consultation. Due to the nature of the consultation (i.e. not having a document or site to comment on, outreach was not considered the most effective method t this stage. |
| Direct mailing | The Council sent out 908 emails and 616 letters notifying the public of the consultation. |
| Dedicated phone and e-mail | The Council publicised two telephone numbers for the public to call if they had any questions regarding the consultation or the document. |
| Attending Area Forums | No area forums took place during the consultation |

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| Partnership meetings | Partners were notified of the consultation; no partnership meetings took place during the consultation |
| Councillor surgeries | <p>All Councillors were notified of the consultation. This helped inform The Councillors in preparation of any queries raised at their surgeries on the consultation. Councillor surgeries are not considered an effective method of promotion; surgeries may be used to answer questions</p> <p>A number of Councillors produced their own leaflets on the 'Call for Sites' consultation.</p> |
| Merton residents panel | |
| Staffed exhibitions | Not appropriate for this stage as nothing to illustrate |
| Merton council magazine: dedicated article in MyMerton | Not used due to the three-month lead-in time for articles |

Stage 2: ‘Planning ahead: draft Sites & Policies Plan and Policies Map (formally Proposal Map), preferred options’ (January-March 2012 (extended to May 2012))

| Consultation methods advised in Merton’s adopted SCI 2006 | Consultation methods used |
|--|---|
| <p>Press release: local / trade press</p> | <p>A press briefing on Stage 2, attended by local newspapers and magazines, was organised by the council on 06 January 2012.</p> <p>A local advertisement was placed in Wimbledon and Morden and Mitcham Local Guardian newspaper on the 17 January 2012.</p> <p>A press release was issued to trade press, which resulted in articles in Estates Gazette and Planning Magazine (January 2012)</p> <p>This substantial media activity resulted in many press stories relating to Stage 2 (appeared in :</p> <ul style="list-style-type: none"> • 13/01/2012 Planning for the next decade – Wimbledon SW19 (local website) • 13/01/2012 The changing face of Wimbledon: The big issues facing our town- Wimbledon People (local website) • 13/01/2012 Major consultation to boost future financial resilience- Sopo.org (trade website) • 13/01/2012 Merton Council plans redevelopments- Radio Jackie (local radio station) • 13/01/2012 Merton Council plans to boost borough’s future economic resilience- Sustainable.gov (trade website) • 14/01/2012 Development plots served up in SW19 – Estates Gazette (trade magazine) • 19/01/12 Are there plans to bring the Dons back to SW19- Local Guardian (local paper) • 19/01/12 New hotel on Broadway- Local Guardian (local paper) • 19/01/12 Delivery office to be sold- Local Guardian (local paper) • 19/01/2012 Huge facelift for borough- The Post (local paper) • 23/01/2013 New high street to transform Colliers Wood- Local Guardian (local paper) |
| <p>Council website or associated / relevant websites.</p> | <p>Details of the consultation was placed on the Council’s public accessible ‘Get involved’ consultation portal, explaining what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.</p> <p>A dedicated Stage2 website launched at the start of the consultation with information of the consultation and the documents available to download from the website.</p> |

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| | As set out above, substantial web interest was generated from the media campaign. |
| Leaflets on specific Local Plan topics | <p>“Planning ahead” leaflets and posters produced; distributed at libraries, community meetings, by post</p> <p>The <i>Sites and Policies Plan Stage 2</i> was produced as a whole document and also by area (e.g. the sites and land designations proposed for Mitcham) to encourage local interest and make the proposals more manageable.</p> <p>Community groups often referred to the consultation in their newsletters, which was often more effective publicity than hearing about it from the council.</p> |
| Outreach | <p>Outreach was considered the most effective method at th.</p> <ul style="list-style-type: none"> - Wimbledon Society (09 January 2012) - Merton engagement group (19 Jan 2013) - Friends of West Barnes library (13 February 2012) - Mitcham Society (March 2013) - Ahmadiyya Muslim Association (06 March 2013) - Colliers Wood Residents Association (06 March 2013) - Merton Park Residents Association (06 March 2013) - Wimbledon Society (08 March 2013) - Willow Lane Business Improvement District (13 March 2013) - South Ridgeway Residents Association (21 March 2013) - Meetings with landowners were held throughout the consultation period |
| Direct mailing | The Council sent out 879 emails and 575 letters notifying the public of the consultation at the start of the consultation. Between the 3 rd and 4 th March 2012 reminder emails were sent out informing the public there was still time to submit comments. |
| Dedicated phone and e-mail | The Council publicised two telephone numbers for the public to call if they had any questions regarding the consultation or the document. |
| Attending Area Forums | Since Merton’s SCI was adopted in 2006, the council now supports one Area Forum per district per year (In Raynes Park, the local Association host about 4 meetings per year). Raynes Park area forum took place on 22 March 2013 |
| Partnership meetings | <p>A dedicated space was available in council libraries to promote and allow time to consider the consultation documents and respond.</p> <p>Partners were notified. At the time the NHS Primary Care Trust was disbanding (by April 2012) and becoming various other groups including the Clinical Commissioning Group and the council’s own Public Health directorate</p> |
| Councillor surgeries | Political groups were briefed on the proposed plans (Conservative group 06 February 2012) |

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| Merton residents panel | Not used; LDF consultation database of over 1,000 entries thought to be more effective. |
| Staffed exhibitions | Were not undertaken due to the very wide range of issues being consulted on. Generally only effective for single sites |
| Merton council magazine: dedicated article in MyMerton | Short article used to promote the consultation |

Stage 2a: ‘Additional sites and policies’ preferred options continued June-July 2012 (15 additional sites and 3 additional policies)

| Consultation methods advised in Merton’s adopted SCI 2006 | Consultation methods used |
|--|---|
| Press release: local / trade press | As the consultation related only to 15 additional sites and three additional policies; a public notice in the local paper was used to generate interest. |
| Council website or associated / relevant websites. | <p>Details of the consultation was placed on the Council’s public accessible ‘Get involved’ consultation portal, explaining what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.</p> <p>A dedicated Stage2a website launched at the start of the consultation with information of the consultation and the documents available to download from the website.</p> |
| Leaflets on specific Local Plan topics | Apart from the consultation documents, no specific leaflets were produced given the relatively brief focus of this consultation on 15 sites and three policies. |

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| Outreach | <p>Although there was a much more limited number of sites and policies published for this consultation (which limited the geographic interest of the consultation on sites), outreach was still considered an effective method of engagement as it gave participants the opportunity to ask specific questions relating to their area and then decide whether or not they wanted to respond.</p> <ul style="list-style-type: none"> - Raynes Park Community Forum (21 June 2012) - Mitcham Business Forum (26 June 2012) - Wimbledon Community Forum (26 June 2012) - Morden business forum (28 June 2012) - Meetings with landowners were held throughout the consultation period to pursue site deliverability - |
| Direct mailing | <p>The Council sent out 879 emails and 575 letters notifying people and organisations on the LDF database of the <i>Stage 2a</i> consultation at the start of the consultation.</p> <p>In addition, approximately 8,000 letters were sent to postal addresses (residential and commercial) located 800m (10 minutes walk) of the Rainbow Industrial Estate in Raynes Park, alerting occupants to the draft Rainbow planning brief and the <i>Stage2a sites and policies plan</i> consultation.</p> |
| Dedicated phone and e-mail | <p>The Council publicised two telephone numbers for the public to call if they had any questions regarding the consultation or the document.</p> |
| Attending Area Forums | <p>Since Merton's SCI was adopted in 2006, the council now supports one Area Forum per district per year (In Raynes Park, the local Association host about 4 meetings per year). Forums that took place during this consultation period included: Raynes Park Community Forum (21 June 2012; Mitcham Business Forum and Wimbledon Community Forum (26 June 2012) Morden Business Forum (28 June 2012)</p> |
| Partnership meetings | <p>Following the termination of the Primary Care Trust in April 2012, a Joint Health and Wellbeing Needs Strategy was being prepared and the council met with partners on the preparation of this and its influences into Local Plan making and delivery.</p> |
| Councillor surgeries | <p>Not used given the more limited scope of this consultation. Councillors held a meeting on 10 July 2012 which officers attended for the draft Rainbow planning brief and specific issues relating to <i>sites and policies plan</i> in Raynes Park (i.e. the Raynes Park proposed town centre boundary on the draft Policies Map) were raised.</p> |
| Merton residents panel | <p>Not used; LDF consultation database of over 1,000 entries in addition to distribution to +6,000 properties in the Raynes Park area thought to be more effective.</p> |

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| Staffed exhibitions | An exhibition was undertaken on Friday 29 and Saturday 30 June 2012 relating mainly to the draft planning brief for the Rainbow Industrial Estate in Raynes Park. The <i>Sites and Policies</i> consultation information was available at the event. |
| Merton council magazine: dedicated article in MyMerton | Not used given the long lead-in time for MyMerton. |

Stage 3: 'Towards a final plan: draft Sites & Policies Plan and Policies Map (formally Proposal Map) January – February 2013

| Consultation methods advised in Merton's adopted SCI 2006 | Consultation methods used |
|---|--|
| Press release: local / trade press | <ul style="list-style-type: none"> A press release was published on 18 January 2013. Publicity was generated from this press release mainly around the Wimbledon Greyhound stadium site |
| Council website or associated / relevant websites. | <p>Details of the consultation was placed on the Council's public accessible 'Get involved' consultation portal, explaining what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.</p> <p>A dedicated Stage3 website launched at the start of the consultation with information of the consultation and the documents available to download from the website.</p> <p>As set out above, substantial website coverage was also achieved via encouraging media interest.</p> |
| Leaflets on specific Local Plan topics | <p>Learning from the Stage 2 and 2a consultations, the <i>Sites and Policies Plan</i> Stage 3 was produced as a whole document and also by area (e.g. the sites and land designations proposed for Mitcham) to encourage local interest and make the proposals more manageable.</p> <p>Community groups often referred to the consultation in their newsletters, which was often more effective publicity than hearing about it from the council.</p> |
| Outreach | <p>This outreach focussed on ward-by-ward impacts of the <i>Sites and policies plan</i> to ensure that residents, businesses and councillors were clear about the changes being proposed</p> <ul style="list-style-type: none"> - Wimbledon Park residents association (22 January 2013) - Residents near Morden Park (23 January 2013) - Ravensbury ward (24 January 2013) - NHS representatives (25 January 2013) - 29 January 2013 (Dundonald ward) - 30 January 2013(South Wimbledon consultation) - Ravensbury Ward (04 February 2013) - Figges Marsh ward (07 February 2013) - St Helier ward (07 February 2013) - Wimbledon Park ward (07 February 2013) - Cannon Hill ward (11 February 2013) - Colliers wood ward (11 February 2013) - Pollards ill ward (12 February 2013) - Merton Park ward 13 February 2013) - South London Partnership 26 February 2013) |

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| | <ul style="list-style-type: none"> - Graveney Ward (27 February 2013) - Trinity ward (27 February 2013) - Abbey ward – 28 February 2013) - Meetings with landowners were held throughout the consultation period |
| Direct mailing | <p>The Council sent out a total of 1,843 emails and letters notifying the public of the consultation at the start of the consultation.</p> <p>In addition, the council distributed leaflets around all potential site allocations that were outside town centres (on the basis that all allocations inside town centres were being allocated for uses compatible with a town centre location and local business forums and other partners such as Merton Chamber of Commerce were also made aware.</p> <p>The leaflets were distributed to postal addresses around the sites in accordance with the site size. For example, site 02 Palestine Grove in Colliers Wood, one of the smallest sites in the plan at 0.02ha, had leaflets distributed to 14 properties: immediate neighbours and homes opposite. At the other end of the scale, the Wimbledon Greyhound Stadium had leaflets distributed to over 5.600 properties in Merton and Wandsworth, selected as being 500m from the site boundary and including logical extensions along main roads.</p> |
| Dedicated phone and e-mail | The Council publicised two telephone numbers for the public to call if they had any questions regarding the consultation or the document. |
| Attending Area Forums | No area forums took place during this consultation stage |
| Partnership meetings | <p>A dedicated space was available in council libraries to promote and allow time to consider the consultation documents and respond.</p> <p>The NHS and the South London Partnership were the two</p> |
| Councillor surgeries | Individual meetings were organised and held with councillors representing all wards (apart from Village ward, who were offered but did not want a meeting) |
| Merton residents panel | Not used; LDF consultation database of over 1,800 entries in addition to the leaflet distribution around specific sites was thought to be more effective. |
| Staffed exhibitions | Were not undertaken due to the very wide range of issues being consulted on. Generally only effective for single sites |

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| Merton council magazine: dedicated article in MyMerton | Short article used to promote the consultation |
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Stage 4: 'pre-submission publication: July-August 2013

| Consultation methods advised in Merton's adopted SCI 2006 | Consultation methods used |
|---|--|
| Press release: local / trade press | <ul style="list-style-type: none"> A public notice was prepared and issued on 15 July 2013 |
| Council website or associated / relevant websites. | <p>Details of the consultation was placed on the Council's public accessible 'Get involved' consultation portal, explaining what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.</p> <p>A dedicated Stage4 website launched at the start of the consultation with information of the consultation and the documents available to download from the website.</p> |
| Leaflets on specific Local Plan topics | <p>Learning from the Stage 2 and 2a consultations, the <i>Sites and Policies Plan</i> Stage 3 was produced as a whole document and also by area (e.g. the sites and land designations proposed for Mitcham) to encourage local interest and make the proposals more manageable.</p> <p>No</p> |
| Outreach | <p>- Outreach seeking changes to the plan was limited at this publication stage: the council had resolved that this was to be the final plan</p> |
| Direct mailing | <p>The Council sent out a total of 1,850 emails and letters notifying the public of the consultation at the start of the consultation.</p> |

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| Dedicated phone and e-mail | The Council publicised two telephone numbers for the public to call if they had any questions regarding the consultation or the document. |
| Attending Area Forums | No area forums took place during this consultation stage |
| Partnership meetings | Not held as part of this consultation stage |
| Councillor surgeries | Individual meetings were organised and held with councillors representing all wards (apart from Village ward, who were offered but did not want a meeting) |
| Merton residents panel | Not used; LDF consultation database of over 1,800 entries in addition to the leaflet distribution around specific sites was thought to be more effective. |
| Staffed exhibitions | Were not undertaken due to the very wide range of issues being consulted on. Generally only effective for single sites |
| Merton council magazine: dedicated article in MyMerton | Not held due to the 3 month lead in timescales |

Statement of Consultation – Part 2 Summary of Responses Received

Table 1: Summary of representations received from all parties by policy during Stage 2/2a consultation.

| Policy | Responder | Comments received | Action |
|--------|--|---|--|
| DM R1 | Mayors Office for Policing and Crime/Metropolitan Police Service | <p>The following change is recommended to section a), parts i and ii. in order to ensure the emerging document complies with relevant policy (additional wording in bold):</p> <p><i>Development that provides a range of unit sizes, including large (floor space generally between 280sq.m and 1000sq.m) and major town centre type uses including community facilities (generally over 1000sq.m gross floor space) in...</i></p> <p><i>'Development up to 1,000sqm per unit of floorspace for shops, services, offices a-Rd—business uses and community facilities which provide an active use in the designated local centres</i></p> | Action - insert community facilities into the justification text as this is an "umbrella term" that includes all community uses including policing. We have made changes to DM R1 to delete specific references to uses in the policy put instead refer to 'town centre type uses' - again this is an umbrella term that is all inclusive. |
| | Wimbledon Society | 1) Policy Aim should include reference to 'community facilities'. 2) Reword policy to put town centres before requirement. 3) Is 1,000 sqm for Mitcham appropriate. 4) Paragraph 1.2 - to include "Community/ Social/ Leisure' after "retail and other commercial services". 5) Para 1.11 - should there be a reference to designated shopping frontages before this paragraph? | 1) acknowledged – the text was amended to include another umbrella term to be more inclusive of all other town centre type uses. 2) The text was amended in accordance with the suggestion. 3) Yes it is appropriate - this is based on both qualitative and quantitative research. 4) This sentence makes reference to civic and commercial facilities as well as retail so therefore includes community, social and leisure uses. 5) No - this would make the justification text more complicated and policies relating to designated shopping parades are detailed in Policy DM R4. |
| | Wimbledon East Hillside Residents' Association (WEHRA) | Issue re justification to this policy which refers to the 'Wimbledon Brand' - as they are of the opinion that any future development concepts or proposals will be asset against this | This is incorrect - future proposals for change of use or developments throughout Merton, including Wimbledon' will not be assessed |

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| | | <p>'brand; so it is fundamentally important to define this brand. They further define what is meant by the 'Wimbledon Brand'. 2) Point (i) of A - replace 'a range of' to 'thoughtfully balanced'. They have also raised that we do not define what a range is. 3) Paragraph 1.6 - Wimbledon is currently not attractive to Wimbledon's residents. Also shops such as Poundland would not be suitable in Wimbledon. 4) Paragraph 1.8 -To indicate that a mix of small, large and major developments are acceptable in these centres</p> | <p>against this brand. We refer to the Wimbledon 'brand' to describe Wimbledon and using this term to highlight the global recognition that Wimbledon has, unlike perhaps other areas in London. Future proposals for change of use or developments are all assessed against Merton's development plan. The Wimbledon 'brand' was a term highlighted in the Economic Development Strategy (2010).</p> |
| DM R2 | Cromar White Developments | <p>It is not clear from the title of Policy DN R2 whether it is a policy to control out-of-centre retail only or other main town centre uses. The actual wording of the policy suggests it is retail focused and therefore the title of the policy should change to 'Out-of-Centre Retail Development'.</p> | <p>Action - change the title of the policy to 'Development of Town Centre Type Uses Out-of- Centre'. The policy was also updated to be in accordance with the NPPF. The text regarding the policy for which town centre type uses that we require an impact assessment for has been clarified. To note, the policy is not restrictive and will not stymie growth - it actually does more than the NPPF and London Plan allows. Town Centres First has been reinstated in the NPPF so comments are irrelevant.</p> |
| | The John Innes Society | <p>We do not support Policy 1.18.c) iii) to would allow petrol stations to increase their retail space from 100 sqm to 280sqm. Our local experience with the BP Petrol Station at Wimbledon Chase is that since it included a Marks and Spencer food store, shoppers leave their cars at the pumps while they select their shopping, causing long queues for petrol. No petrol station should be allowed to include a food store of any size unless it can provide a dedicated parking area for shoppers which must be managed by the petrol station to prevent queues building up for the pumps.</p> | <p>Under current policy (Policy S.6: Small-Scale Retail Development Outside Existing Shopping Centres) retail is permitted in petrol stations up to 100m². As mentioned in the justification to the policy, we increased the floorspace permitted to help with the viability of petrol stations - due to initial evidence which suggests that the presence of petrol stations have decreased in Merton over a number of years. Small shops under 280 m² would not really have a significant impact on Merton's town and local centres. No</p> |

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| | | | action is therefore considered necessary as the evidence suggests the increase is sufficient. |
| DM R3 | Wimbledon Society | Suggest omitting the last two lines about vacancy rates: so as to read: “.... all local shops are within walking distance of all residents in Merton ”. If there is an issue about vacancy, this should have its own policy | This policy serves many purposes including reducing vacancies that are not in designated areas, therefore this suggestion will not be taken forward. |
| | Wimbledon East Hillside Residents' Association (WEHRA) | c) It needs to be specified that to get a change and move away from A1, ' 30 months' marketing to prove that this is no longer viable. We have lost far too many retail sites to A4/A5 and unless some of these venues revert to A1, we will have a town centre with few shops and vacant, former restaurants, as is happening now. | This policy states this. Therefore, this comment supports this policy direction. |
| DM R4 | Merton Conservative Group | The look and feel of shop frontages within Merton is a crucial aspect of providing some rhythm and harmony to a town centre or neighbourhood parade. As a result, we would recommend that the Council requires planning permission be sought for any shopfront signage. We also recommend that there be a specific requirement for the constant height and protrusion of shop frontages. A mixed street frontage where they are all at different heights makes a street front look unfriendly to the eye. Regarding the provision of amusement centres, it is not clear from the document whether betting shops are also included under the heading of 'Amusement Centres'. If they are, then we agree with statement in 1.53 that they are not appropriate uses in core shopping frontages. We would also argue that such premises should not be located near schools and other premises designed for young people, such as youth and | 1) This matter is covered in Policy DM R1: Design considerations in all developments and DMD5 Advertisements of the Sites and Policies DPD. Regarding the second point, amusement centres are not clearly defined in the justification text nor in the glossary - therefore will consider further how we can clarify what is meant by amusement centres. The glossary or justification will be updated accordingly. Amusement centres does not include betting shops and is within the sui generis Use Class. As betting shops are currently within the same Use Class as financial and professional services (A2), it is difficult to implement a policy to restrict this use and to monitor such a policy. The council undertook |

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| | | community centres. | research which showed that betting shops have not significantly increased over the years and, as such, are not a significant issue for Merton. |
| DM R4 | Wimbledon Society | 1) The grading of the various shopping centres and frontages should be made clear as should the definition of "Primary" in relation to the "Central, Core and Secondary" and "Designated" (and presumably undesignated frontages). 2) Paragraph 1.53 - delete existing sentences and replace with "... Amusement Centres are not considered appropriate uses in core shopping frontages. | 1) An explanation/definition of 'Wimbledon central shopping frontage', designated and undesignated shopping frontages are explained in the justification text/glossary. 2) Rephrase existing text to "Amusement Centres are not considered appropriate uses in core shopping frontages as they are not compatible with the main retail function". |
| | Wimbledon East Hillside Residents' Association (WEHRA) | 1) Policy B need to define 'significant breaks'. 2) As Wimbledon Hill is a primary shopping area for residents, the growth of restaurants, bars and estate agents in this areas should be stopped as a matter of urgency - encouraged to designate a percentage here. 3) Part D to include uses that only take place during the day and evening and to exclude reference to nighttime economy - anything after 11pm will be heavily scrutinised. 4) Consider the existing proportion of 70% would create deadspace and suggest that this should be reduced to 50%. 5) Issue with Wimbledon Brand. 6) No more room for leisure or entertainment facilities in Wimbledon. 6) Issues with pubs allowed in town centres due to impacts on town centre residents and also pubs being located on the perimeter of the town centre. | 1) Significant breaks are defined in the justification text. Perhaps in the introduction to this document we should explain what the policy and justification text are. 2) This area is designated in the Secondary Shopping Frontage where we encourage all town centre type uses subject to 70% remaining in A uses, including retail, financial and professional services, cafes and restaurants, public houses and hot food takeaways. All A uses can revert back to A1 (retail) under the general development permitted order. To restrict this area to A1 use (retail) only would be unreasonable and would not be keeping within the spirit of NPPF and the London Plan. 3) Please refer to comments re nighttime economy above. |
| DM R5 | CAMRA | 1) Need to provide a definition of 'full and proper' marketing and to require more robust information to be back up by a surveyor who specialises in public houses 2) to define the words marketing, viability, council's satisfaction etc.... 3) | To consider making the policy more stronger and update where necessary |

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| | | when proposals for the changes to or the conversion of ancillary accommodation to residential, the Council should consider conditions to remove the change of use permitted under the GDPO. 4) reduce the radius for alternative or equivalent facilities from 800 to 400 meters. | |
| | Clarke, E | The consultee is confused regarding our policy on hot food takeaways as we state that we wish to stop the proliferation of these uses by not allowing more than 3 in every 10 units on shopping parades - she thinks this is to high. | Evidence did not support changing this policy, |
| | Greater London Authority (GLA) | No comment | No action required |
| | Goldcrest Land Plc | Argues that public houses should not be protected as there are linked with anti-social behaviour and detract from the ability to adopt healthy lifestyles. It is highlighted that many public houses struggle with viability issues and if the business was successful in the first instance, it would not face competing pressure for alternative uses. | Each public house must have a license to operate which can be reviewed should there be concerns with anti-social behaviour. Furthermore, this policy allows for proposals for change of use from public house to alternative uses to be considered on their own merits and takes into consideration market indicators as well as viability issues with the business. |
| | Greyhound Racing Authority | 1) Issue with the marketing period required for the loss from leisure and entertainment to residential uses.They highlight that there is no justification for this marketing period. 2) They are also of the opinion that this blanket approach to all leisure and entertainment uses is not considered appropriate given their diverse range of uses, which are marketed in different ways. | We will consider changing marketing period for all uses - changing words from 'at least' to 'maximum'. To also highlight in the justification text that we do not require the units to be vacant before marketing. |
| | Lavery. A | Highlights that as well as limiting the number of Fast Food/ Takeaway Outlets, there should also be specific mention (in the Regulations) that planning permission will not be permitted for these uses within a certain radius of schools. The consultee also emphasises that this policy has been put forward by other London Boroughs They further recommend | Considered this though decided that our evidence would not support this change to policy, |

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| | | another restriction for us to consider - no two hot food take-away uses should be located adjoining each other. | |
| | Merriman, D | Agrees with pt (f) re hot food take-aways and pt (g) re protection of public houses | No action required |
| | Merton Conservative Group | Supports policies that protects community pubs and restricts the proliferation of hot food take-aways in Merton. However, they feel that the proposed 'saturation' definition of hot food-takeaways is currently set to high and should be reduced further. | Consider changes to the current definition of 'saturation' of hot food take-aways though to to evidence decided not to update policy. |
| | Merton Liberal Democrats | Although they support proposals to restrict the over concentration of hot food take-aways, they are uncertain of the justification provided - "detracting from the ability of individuals to adopt healthy lifestyles". They argue that in order to remain viable, they believe that suitable areas should contain a mix of food and drink uses, as well as other commercial uses. | Consider further - perhaps updating justification to make clear that this policy is steaming from evidence in Merton. |
| | NHS Sutton and Merton | Support main option pt f of policy and object to alternative option. They encourage the council to include a 'saturation point' policy aimed at reducing the prevalence and clustering of hot food take-aways especially in close proximity to schools, parks and youth amenities. This could potentially link with work with local businesses under the local 'Public health responsibility deal'. Example attached from Barking and Dagenham. | Research 'Public Health Responsibility Deal' and update accordingly. |
| | The Theatres Trust | Support the protection of public houses as these can be transformed as additional venues to provide a range of smaller performances spaces, from new plays and dance to live music and comedy which make a vibrant contribution to the evening economy. | No action required |
| | The Theatres Trust | We support Policy DM R6 Culture, Arts and Tourism, as it will protect and enhance the Borough's theatres. However, there is a slight overlap with Policy DM R5 Food and Drink/Leisure | Interesting point - although theatres would form part of the evening economy and would require a permit to operate, their main contribution to |

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| | | <p>and Entertainment Uses, as theatres are very much part of your evening economy, as well as being a cultural asset, although they do not belong within the D2 Use Class and are therefore excluded from this policy.</p> | <p>Merton is that there are a cultural asset and they would also have day time shows. Therefore no change to the policy is required.</p> |
| | <p>Wimbledon Society</p> | <p>1) To include a specific reference to 'residential areas' in pt a of Policy DMR5. 2) Create point vii - Hours of Opening. 3) Include 'ON OR OFF SITE BEHAVIOUR" - so the sentence reads as "... an unacceptable effect on local amenity through noise, disturbance by on or off site behaviour, or fumes". 4) Do not support policy H) though suggests that "any existing community or entertainment land use should be replaced on its site within any redevelopment". 5) Paragraph 1.79 - include 'and public community' into the following sentence "... In addition to the shopping and retail service offer, these leisure, entertainment and Public Community facilities makes"</p> | <p>1) Rather than including 'residential area' specifically we have referred to the following "The proposals would not have an unacceptable impact on local amenity and general environment". 'Local amenity and general environment' in policy is more of an umbrella term that is more inclusive and flexible. Similarly we do refer to impacts re noise on adjoining residential and business uses in the policy therefore this issue is covered. However we should not go down the specifically mentioning residential area route as this could further complicate policy and implementation thereof as well as having an impact on licencing which is dealt with separately. 2) Hours of opening are again a separate issue dealt with by licencing. 3) It would be difficult for someone to fully satisfy such a policy and therefore difficult to implement however the existing text has more flexible wording and is all encompassing. The police are including in permitting licencing and there are reviews of licenses due to reports of anti-social behaviour.</p> |

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| | Wimbledon East Hillside Residents' Association (WEHRA) | <p>Policy aim) Please add that 'night time' development – i.e. anything after 11 pm -- must be done with great sensitivity to local residents.</p> <p>b) Add: Proximity to residential is a factor in WTC, and any proposals cannot cause a loss of amenity to the immediate community. Households on the perimeter of the Town Centre deserve the same respect as other residential homes.</p> <p>At present, a developer can put a bar on the absolute perimeter, and Merton says that' ok because it is in the Town Centre. Surely the reverse is the right way, that the local people have a right to quiet enjoyment, and a developer should be refused permission to put a community-detrimental business on the perimeter of the Town Centre zone</p> | <p>1) Outside of paragraph 1.79 where we refer to Wimbledon town centre being identified as a 'night time economy cluster of regional/ sub-regional importance' in the London Plan - this is the only place where we refer to 'night time' and to highlight this is an 'identification' term used in the London Plan, therefore we cannot change it. However we will ensure that throughout the document that the 'night time economy' is referred to as 'evening economy'.</p> <p>2) Rather than perimeter we have referred to the following "The proposals would not have an unacceptable impact on local amenity and general environment". 'Local amenity and general environment' in policy is more of an umbrella term that is more inclusive and flexible. Similarly we do refer to impacts re noise on adjoining residential and business uses in the policy therefore this issue is covered. However we should not go down the perimeter route as this could further complicate policy and implementation thereof.</p> |
| | Wimbledon East Hillside Residents Association | <p>1) Issue with the words 'night time' and 'evening' economy casually used. They provide their own definition of these terms which makes 'night time' sound much more onerous than 'evening'. Subsequently they prefer the use of 'evening economy' rather than 'night time economy' and would like the entire document to be updated to reflect this. 2) Issue with effects of licenced premises on residents living on the perimeter of the Town Centre. In the last sentence replace 'welcome' with 'encouraged'.</p> | <p>Double check document and update to evening economy - no further action required.</p> |
| DMR6 | GLA | <p>1) GLA are supportive of this policy. 2) Include "small</p> | <p>We have considered these comments and</p> |

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| | | (floorspace generally below 280sqm), large (floorspace between 280sqm and 1,000sqm)" in part a of the policy. 3) In part eiii change 'or' to 'and' so the policy reads as "Where it can be demonstrated that the existing tourist accommodation is no longer viable and does not provide facilities for the local community". | updated this policy accordingly. |
| | Greyhound Racing Authority | Issue with the marketing period of 30 months. | We will consider changing the marketing period for all uses - changing words from 'at least' to 'maximum'. Though following Stage 2 this change was made, comments received during Stage 3 highlighted that there was concern with using the word 'maximum', and it was recommended that this should be changed 'to the council's satisfaction'. Furthermore, by the time of the examination, the council will have completed evidence to support this time period. The policy has been updated accordingly. |
| | Merriman. D | Considered that BandB should only be permitted in residential areas only, otherwise, it should not have an impact on the local community and local environment. | Noted. No change to the policy was requested therefore no change is made. |
| | NHS Sutton and Merton | Support | No action required |
| | The Theatres Trust | Support this policy as it will protect and enhance the Borough's theatres. However they are of the opinion that there is a slight overlap with Policy DMR5 - as theatres are very much part of the evening economy, as well as being a cultural asset, although they do not belong within the D2 Use Class and are therefore excluded from this policy. | Though it is appreciated that theatres could be considered as part of the evening economy, theatres are primarily cultural assets and as such are treated differently with regards to policy in Merton. |
| | Wimbledon Society | Object to point e) of this policy as they are of the opinion that we should protect these uses should be protected indefinitely. They would like this policy to state "That all existing floorspace of this kind is to be replaced within the new development (or on a new site nearby) for instance the | The proposed policy takes into consideration market indicators to consider if the permitted use (including other commercial uses should the site be located outside a town centre) is viable before a change is permitted. These comments |

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| | | former billiard hall was replaced with a fitness club. | are noted but no change is required. |
| DMR7 | Clarke. E | Supports local markets however highlights that there are no existing street markets in Morden town centre. Supports the development of a proper street market in Morden town centre. | Noted. No change requested. |
| | GLA | GLA are supportive of this policy. | No action required. |
| | NHS Sutton and Merton | Support this policy - especially where markets contribute to increasing access to affordable healthy food. | No action required. |
| DM H1 | Metropolitan Police Service (MPS) | Policy should incorporate designed security features that create a safe place to reside where opportunities for criminal behaviour are reduced. The design should take into account Government guidance on 'Safer Places' and other guidance such as 'Secured by Design' published by the police. | Action – the text in the policy was amended. Inclusion of specific references to Secured by Design Guidance in policy wording would prioritise this guidance over other relevant guidance such as 'By Design' 'Manual for Streets' and 'Urban Design Compendium'. Specific reference to Secured by Design Guidance and the aforementioned other guidance will be included in the supporting text. |
| DM H2 | Cromar White Developments | DMH2 introduce other considerations into policy "taking account of site size etc..." | The policy thrust is to ensure the creation of a choice of housing to cater for all sectors of the community. The factors and considerations against which the policy will be applied are appropriately addressed in the supporting text for the policy. |
| | English Heritage | Too absolute in stating (without any other proviso) that permission for housing development will be granted if it contributes to meeting the needs of different households. It is important to state that it will also need to be otherwise compliant with the Core Strategy and the other policies in this DPD or there is a risk that it will override all other considerations | No change proposed - paragraph 2.34 of the policy already states that housing mix will be applied "... <i>having regard to relevant factors including individual site circumstances, site location...</i> " etc. This adequately covers contextual design issues |
| | English Heritage | English Heritage notes that this policy is assessed as having | Policy would be implemented in accordance with |

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| | | a neutral impact on the historic environment. We consider, however, that this policy, by providing scope for the demolition of structurally sound buildings, presents a potentially negative impact on heritage assets, and we consider that it creates tension with paragraph 132 of the NPPF which requires “clear and convincing justification” for harm or loss to heritage assets as well as that documents core principles concerning heritage and the reuse of existing buildings | LBM’s existing policies seeking to conserve and enhance Merton’s heritage assets (i.e. Policy CS14) |
| | GLA | Demolition and redevelopment of a single dwelling house. GLA is supportive of this policy | None |
| | Merton Conservative Group | There has been an overdevelopment of 1 and 2 bedroom flatted properties, which has reduced the relative supply of family housing in the borough, resulting in demand outstripping supply and an additional driver to the higher than average house prices which exist in many parts of Merton. As a result, we recommend the following: <ul style="list-style-type: none"> • An increased emphasis on the provision of family sized homes rather than smaller flatted properties. • Houses under 120m² floorspace should not be given permission to be converted into flats | The policy was amended to place more emphasis on houses in subsequent drafts of the Sites and Policies Plan. |
| | Merton Liberal Democratic Group | Suggest addition of wording to policy mix "alongside individual site specific circumstances, including site location, viability and local setting" | No change. The factors that will be taken into account in the application of the policy are appropriately set out in the policy. |
| | Natural England | Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken | Merton’s Core Strategy Policy CS 13 (g)(2) states that the borough will: “ <i>Encourage new green links, green corridors and islands to seek to reduce areas of deficiency in nature conservation and to create safe species movement and havens for nature,</i> ” and paragraph 21.8 states: “ <i>Habitat improvement and creation are crucial to the aims of protecting and enhancing biodiversity. We will protect and seek to</i> |

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| | | <p>down by the following system:</p> <ul style="list-style-type: none"> ➤ No person should live more than 300 metres from their nearest area of natural green-space; ➤ There should be at least one accessible 20 hectare site within 2 kilometres; ➤ There should be one accessible 100 hectares site within 5 kilometres; ➤ There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some boroughs more than others, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their borough.</p> | <p><i>enhance the borough's biodiversity through supporting measures which meet the objectives of the London Plan targets for habitats and seek to improve access to nature."</i></p> <p>Merton uses the methods prescribed in Appendix 1 of the Mayor's Biodiversity Strategy 2002. The singular relatively small area that is deficient in access to a site of recognised nature conservation interest, is shown on maps in Merton's Open Space Study 2010/11 and any changes are reported in Merton's Annual Monitoring Report.</p> <p>This matter is therefore already addressed and monitored in a number of relevant documents and there is no need for duplication in the Sites and Policies DPD.</p> |
| | Reid. P | Provision should also be made for other specialist accommodation such as hostels, student residences and houses of multiple occupations. | This provision is addressed in policies DM H1 and DM H5. |
| DM H3 | GLA | <p>We welcome Merton's approach that 60% of affordable housing should be for social and affordable rent and 40% for intermediate rent or sale. This reflects SPG implementation of the 2011 London Plan and the approach proposed in the Revised Minor Alterations in the London Plan (REMA). However, the policy must also reflect the London Plan and the NPPF requirement to address the full range of housing need and also acknowledge the unique circumstances of the London's housing market which means boroughs should seek to address strategic as well as local housing need. More specifically, the policy should seek to maximise output and</p> | Noted. No change. |

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| | | <p>not attempt to constrain delivery. Setting rent caps on affordable rent at 65% of market rent could constrain delivery and prevent the maximisation of affordable housing delivery. Capping affordable rent levels is therefore not in conformity with London Plan policy (policies 3.11 and 3.12) or the Mayor's Housing Strategy and the government has made it clear that setting rent levels is not a matter for planning policy. The London Plan and the draft Housing strategy emphasise that the priority for affordable housing is maximising supply, having regard to Lila availability of resources. The nationally set definition of affordable rent product makes clear that it must be available at rent up to 80% of market rent (National Planning Policy Framework (NPPF)). The approach which seeks to impose local, lower rent ceilings through the planning system would compromise the flexibility necessary for the product to deliver affordable housing in different circumstances and in turn will not be compliant with national guidance and This point is made strongly in SPG on implementing the 2011 London Plan and Grant Shapps (Appendix IS) has confirmed it in the context of the NPPF through his representations on Revised Early Minor Alterations (REMA), would not be in general conformity with London Plan (Policies 3.11 and 3.12). Plan and Grant Shapps (Appendix B) has confirmed it in the context of the NPPF through his representations on Revised Early Minor Alterations (REMA). The REMA refines and develops on the LP as published and its associated draft SPG - that if boroughs adopt planning policies that seek to restrict use of affordable rent product and / or set rent caps below 80% for affordable rented properties of different sizes of affordable rent, then they would not be in conformity with the Plan and its emphasis on maximising provision.....</p> | |
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| | London Borough of Croydon | With regard to meeting housing targets and the Sites Proposals, the Council is concerned that it is not easy to establish the relation between the residential allocations in the draft DPD and Merton's Core Strategy Policy CS9. A more detailed trajectory would be helpful. | Noted. Policy CS9 sets out the strategic housing target for Merton for the 15 year duration of the Core strategy. Indicative ranges for the five sub-areas are also included. The Housing Trajectory which is set out in Merton's annually produced AMR sets out housing delivery progress against the strategic housing target set out in the Core Strategy. The proposed residential allocations will contribute to meeting the strategic housing target. No action is therefore considered necessary. |
| | London Borough of Croydon | Policy DM.H3, Support for Affordable Homes, does not present any conflict with the policy direction that Croydon is proposing for the Croydon's Local Plan - Detailed Policies and Proposals DPD. For your information and consideration Croydon is planning to be more flexible in the approach to affordable housing and is proposing to vary the percentage of rent level required to ensure viability and provision. Croydon has made it clear to registered providers and developers that it does not apply specific affordable rent caps and prefers to take this flexible approach to rents in order to optimise new housing supply. Our position is that rent levels should be determined on a scheme by scheme basis, enabling a range of rents to be agreed, taking account of both scheme viability and affordability. | Noted. Revisions to the policy were made accordingly. |
| | Wimbledon Society | The key thrust of any policy towards affordable housing should be that the properties should be of a high quality and sensible sized rooms together with access to good local amenities. If any of these objectives cannot be fulfilled | Noted. No change in relation to this response. |

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| | | <p>then any application to develop affordable housing should be refused. There should also be adequate infrastructure in place before more housing is built. This not only includes the usual school places, but should also give consideration to the capacity of local utilities such as water and energy networks, sewage handling capacity as well as sufficient open space and playing fields and a practical level of provision for residents to park their cars. In determining the development of any housing, affordable or not, the likely needs of both current and future residents must be given a much greater weighting. In terms of general policy, we would suggest: Emphasis should be on quality and sensible sized rooms not quantity of housing. Additional provision for housing must be accompanied for provision for amenities (schools, playing fields, open space); if we can't provide the amenities, we shouldn't be building more housing. If we are really to tackle deprived areas, we should not be building more affordable housing in those areas with an already high concentration.</p> | |
| | Wimbledon Society | <p>Sustainable development standards: a and b and c: The Society supports the principle of requiring higher standards for replacement houses, but, given that new housing is going to be required to meet Code level 6 in 2016, and the closeness of the Plan to this date, it is unrealistic to specify that replacement houses should now only have to comply with Code 5 level: the Merton Rule approach has been seminal in recent years: Code 6 should therefore be specified.</p> | <p>The government is not requiring building regulations to cover unregulated emissions (emissions resulting from appliance use etc) under the current definition of zero carbon. The CO2 reduction requirements required for Code Level 6 must account for both regulated (emissions from cooking, heating and lighting) and unregulated emissions. Therefore Code Level 6 goes significantly beyond the building regulations targets for 2016. The emissions reductions required for Code level 5 are</p> |

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| | | | <p>equivalent to zero regulated emissions equivalent to proposed building regulations for 2016.</p> <p>The BRE have released policy papers strongly advising against the use of Code level 6 and BREEAM Outstand in local sustainable design and construction targets.</p> |
| | Wimbledon Society | <p>This proposal to allow developers to avoid designing new buildings that properly comply with a Code level and BREEAM standards should not be accepted. It is highly likely that such an option will be used by developers to justify inefficient development and sustainability performance in new buildings. And there will then be time consuming and expensive “negotiations” with the Council officers, reports to and from a technical group, all probably resulting in an overall financial saving to developers and poor performing buildings. Council Plan policy should instead say clearly that the aim must be for all new development to be built to proper modern standards, and offsetting should not be an option. This policy should then establish the primacy of the local Plan over any other scheme, whether nationally promoted or not. Instead of (see (a)) relying on a “Working Group” giving their value judgments on schemes, the Plan should instead set out strict technical criteria that need to be complied with. The legacy of the Merton Rule should not be fudged.</p> | <p>Allowable solutions are an integral part of government policy in ensuring zero carbon development by 2016 - by ensuring a financial mechanism to help those developments where reaching zero carbon level would be too costly or technically unfeasible. AS policy will be used in accordance with the council’s existing sustainability requirements for new developments (i.e. promoting fabric first approach to the energy hierarchy/CO2 reduction) and will therefore not act as a process to justify inefficient development. Regardless of local opinions to allowable solutions the government is pressing ahead with changes to building regulations in order to allow developers to make offsite contributions where they cannot meet sustainability targets onsite.</p> <p>Policy DM H3 has been designed to ensure that Allowable Solutions provide the greatest possible benefit to the borough.</p> <p>The department of communities and local</p> |

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| | | | <p>government has recently launched its consultation on allowable solutions. The results of this consultation are likely have an impact on local policies dealing with allowable solutions.</p> <p>The “Next steps to zero carbon homes - Allowable Solutions” consultations can be viewed here.</p> |
| | Wimbledon Society | <p>1.11 The proposal that an inefficient modern development should be allowed if it subsidizes developments elsewhere should not be accepted. 1.12 a: The whole concept of “additional measures” that are then added in to a design for a new building is misplaced. Rather than “add things in” to an inherently outdated design, the whole design concept should start with the aim of creating a development that has sustainability thinking on energy/water etc at its heart. Energy levels etc need to be integral to the original design of any building. It is premature to devise arrangements now for coping with an AS system, the details of which are unclear, especially as planning for it runs the risk of making it more likely to come about. These arguments point to the conclusion that this Policy should not be added to the Sites and Policies DPD.</p> | <p>In order to ensure that Merton is ready for the move towards zero carbon development, the council is seeking to develop the mechanisms for allowable solutions.</p> <p>Regardless of local opinions to allowable solutions the government is pressing ahead with changes to building regulations in order to allow developers to make offsite contributions where they cannot meet sustainability targets onsite.</p> <p>The “Next steps to zero carbon homes - Allowable Solutions” consultations can be viewed here</p> |
| | Wimbledon Society | <p>Policy on Basement applications is also needed, being a subject which has significant local impacts.</p> | <p>A policy regarding basements was inserted accordingly.</p> |
| DM H4 | No consultation responses received | | |
| DM H5 | No consultation responses received | | |
| DM C1 | English Heritage | <p>It is important to state that it will also need to be otherwise compliant with the Core Strategy and the other policies in this DPD or there is a risk that it will override all other considerations. Policy does not appear to allow that other</p> | <p>Action – whilst it might be helpful it is not necessary as it is established in law - Sections 17 and 38 of the Planning and Compulsory Purchase Act 2004 (as amended) - that local</p> |

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| | | <p>factors might mitigate against the suitability of the proposal and in some instances it may be appropriate that such development occurs in a different location.</p> | <p>development documents should be considered as a whole. No action is therefore needed.</p> |
| | <p>Mayors Office for Policing and Crime/Metropolitan Police Service</p> | <p>The proposed wording is as follows: Planning permission which would result in the loss of community facilities through change of use or redevelopment will only be granted where:</p> <ul style="list-style-type: none"> i) Alternative community facilities of a similar nature are provided locally in the area within which that facility serves; or ii) it would enable the implementation of a strategy for the provision of a community service in the Borough; or iii) the site is either demonstrably unsuitable for continued use as a community facility or is vacant and no community use is forthcoming despite active site marketing on realistic terms Provided that: <ul style="list-style-type: none"> (iv) the alternative or remaining community facilities are easily accessible for those they are intended to serve by foot, cycle, public transport and people with disabilities; and (v) The needs of disadvantaged groups or areas of deprivation have been taken into account. <p>A fifth point should be added, proposed wording is as follows:</p> | <p>The London Plan and Core Planning Strategy state that the net loss of facilities should be resisted. The draft policy conforms to the other documents. The opening sentence of the proposed alternative policy is worded too negatively. Proposed criteria 'i' and 'ii' is addressed in the draft policy under criteria b)i. Proposed criteria 'iii' is addressed in the draft policy under criteria b)ii. Proposed criteria 'iv' is addressed in the draft policy under criteria a)ii. Proposed criteria 'v' is address in the draft policy under criteria b)i. The proposed final sentence does not need to be stated in policy because part b)ii and the Justification Text make it clear that marketing evidence would only be required where a loss is proposed. Based on this information it is considered that no changes are needed.</p> |

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| | | Where no net loss of the community facility occurs, the marketing requirements outlined above will cease to apply. | |
| DM C2 | Clarke. E | Justification paragraph 3.16 - "Other education facilities such as those for adult training....need to be assessed by means of Policy DM C1" etc. | No action needed. Adult education is not a statutory service. |
| | English Heritage | Policy DM C2 allows more explicitly for the upgrading of historic schools to meet modern standards. Guidance on this matter is available on our HELM website referred to above in our comments on the SA. | Comments refer to guidance only and support for the policy. No action needed. |
| | Stutt. C and I | Planning permission for any size of residential development should be refused if the new housing would result in extra pressure for school places in the area. | Comments are in relation to both representations as they allude to the same matter: As is stated in paragraphs 3.14, 3.18 and 3.28, the council is closely monitoring the demand for school places will also be publishing an annual audit regarding the demand and supply of primary and secondary school places, along with strategies to address the findings. The council has an on-going programme of school expansions and has commissioned two consultants' reports to evaluated sites for possible new schools. Primary school children should ideally be able to attend the nearest school of their choice but that might not always be possible. With the current plans in place, it would be highly unlikely that the council would not be able to provide a primary school place within 2 miles from the child's home (<i>a limit where after the council needs the pay compensation for traveling costs</i>). |
| | The John Innes Society | We think Policy c) does not cover the overall situation within the Borough. It is not just large developments which have added to the need for more school places. It is also the steady increase of new housing over a large number of sites (especially mixed use development) which has been encouraged and is now proposed for 41 out of the 63 New Uses sites (and all the group sites). The policy needs to be re-written so that Planning Permission for new residential development (large or small) can be refused if it can be shown that new housing in that location would place a pressure for school places in the area which cannot reasonably be met within the timescale of completion of the development for occupation. Assumptions that smaller units will not have children as occupiers should not be made . Pressure for housing means that many people have to remain in their small residential units after they have families even if they did not have children when they first moved in. An example is The Holt and The Homefield blocks of flats on London Road at | The requirement for the provision of necessary |

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| | | <p>Morden. Most of the flats are very small and there are no outdoor play areas, but the majority of occupants are now families, often of three generations.</p> | <p>infrastructure already exists in Core Strategy Policy CS 11 (parts a, b and c) and the guidance in the Planning Obligation SPD provides the formula for contributions to pay for off-site mitigation where appropriate. From April 2014 developers will have to pay the Community Infrastructure Levy which will provide funding for school place provision.</p> <p>Officers have recently checked the child yield figures in formula in the 2006 Planning Obligation SPD, against actual child yield from a variety of developments and on the balance the figures in the formula are reasonable.</p> <p>Small developments do contribute to the demand on local school places but the current wording of policy DM C2, in combination with the other relevant planning (London Plan and Core Strategy) and annual monitoring documents and strategies, will effectively address any increased demand in school places.</p> |
| | Workspace Group | <p>There is no definition or clarification within the supporting text as to what is deemed to be a 'large development'</p> | <p>The policy was amended in subsequent versions for the Sites and Policies Plan. The policy does state that a large development is in relation to the child yield and not the size of the development. This is stated in paragraph 3.19 of the justification text for policy DM C2.</p> |
| DM E1 | Costco | <p>This does not reflect the London Plan Industrial Capacity SPG (2008) definition of appropriate employment uses which recognises at paragraph 1.9 that potential users of industrial land may include use classes other than B1 (b), B1(c), B2 and B8, such as sui generis uses.</p> | <p>As a blanket policy permitting 'sui generis' uses on designated employment sites is contrary to the London Plan, adopted Industrial Land Capacity SPD and draft Industrial Land and Transport SPD which states clearly that PILS:</p> |

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| | | | <p>"... may be appropriate for other uses of an industrial nature, including some of those classified as sui generis such as car breaking, metal re-cycling, aggregate processing, iron and steel pre-fabrication. However, this cannot be taken as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits". It is therefore considered that no action is needed as it would be contrary to existing policy to specify sui generis uses in the suggested manner.</p> |
| | <p>Mayor's Office for Policing and Crime/Metropolitan Police Service</p> | <p>The following amendment to policy DM EI is recommended:</p> <p>a) Retain existing employment land and floorspace. The council will support proposals for the redevelopment of vacant and underused existing employment land and floorspace for employment use (8 use class and facilities for emergency services where appropriate)</p> <p>f) Provide research and development (B1[b] Use Class), light industrial (81[c] Use Class), light industrial (82 Use Class), and storage and distribution (88 Use Class) and facilities for emergency services where appropriate in the designated industrial areas; strategic Industrial Locations and Local Industrial Sites</p> | <p>As CGMS correctly points out paragraph 2.84 of the policy 2.17 (Strategic Industrial Locations) "policing and other community safety infrastructure may also be appropriate uses in [Preferred Industrial Locations]". This is not a policy though, it is part of the justification text to this policy and the wording says "may". Furthermore, paragraph 4.23 of Policy 4.4: Managing Industrial Land and Premises of the London Plan makes clear that "Redevelopment of surplus industrial land should address strategic and local objectives particularly for houses, and for social infrastructure such as education, emergency services and community activities. In locations on the edges of town centres, surplus industrial land could be released to support wider town centre objectives subject to other policies in the Plan". This highlights that only when surplus land is being released, the uses appropriate on these sites are those uses considered strategic</p> |

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| | | | <p>infrastructure which includes policing. The existing and emerging SPG's sets out clearly the uses that are appropriate on designated employment sites - these exclude community safety infrastructure (policing). Therefore we may not be in line with the London Plan by having a 'blanket policy' which supports the consultees recommendation in the Sites and Policies DPD and as such this request should be considered on a site-by-site basis. No action is therefore considered necessary.</p> |
| | Workspace Group | <p>It is considered that the policy should allow flexibility for proposals for smaller units on sites in locations with a higher PTAL and that an application should be assessed on its own merits and take into account other factors such as the sites constraints and the overall business plan and end- user which is being proposed (SME's, bespoke premises etc).</p> <p>It is considered that Policy DM E1 should reflect the adopted text of the Core Strategy Policy 12. This could be made clear within the Delivery and Monitoring section of DM E1 that there are Locally Significant Industrial Sites which can deliver a greater mix of uses than stipulated within subsection b and f.</p> | <p>1) Although the intention of this policy is to allow only large developments over 280sqm in areas with high PTAL levels - we would not necessarily exclude smaller units from these areas. The respondent has misread the policy however will consider further to ensure that it is clear - for instance stating it clearly in the justification text.</p> <p>2) No need to reference the Rainbow Industrial Estate and the permitted employment-led regeneration through SPD in the Sites and Policies document as it is detailed in paragraph 20.16 in the justification text and mentioned again in the Delivery and Monitoring Section of Policy 12: Economic Development of the Core Strategy. Once adopted, both the Core Strategy and the Sites and Policies DPD will form the development plan for Merton. It is therefore considered that no action is necessary.</p> |
| DM E2 | English Heritage | Considers that ... DM E2 regarding offices in town centres | Regarding DM E2 - Amendments made to |

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| | | would benefit from the inclusion of a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised. | design policies instead (to which all developments would reference). |
| | Merriman. D | But this appears to conflict with Council's former intention to revitalize town/local centres by encouraging residential occupation on upper floors, especially old offices over shops. Or is there another policy covering this? Unless there is another policy covering this point, I object to the introduction of this policy. | Policy DM R3 deals with the re-occupation of commercial units outside of town and local centres and neighbourhood parades. Policy DM E2 deals with the change of use from office to residential uses only in the upper floors of designated town and local centres. Therefore there is no conflict. Viability evidence throughout the years has shown that residential uses have higher land values, therefore competing with commercial uses. Our evidence shows that there is a demand for offices, particularly in Wimbledon town centre. This policy is not onerous and is in line with the NPPF - creating jobs. No action is therefore considered necessary. |
| DM E3 | Workspace Group | We suggest that this marketing period be reduced to a reasonable timeframe (for instance 1 year to 18 months) and allow for flexible planning in times of poor economic climate. | Our initial research justifies the marketing period of commercial/ employment units for 2.5 years. Our analyses shows that for employment/ commercial uses it takes at least 6 months of marketing to attract potential occupiers, 6 months of negotiations with occupiers and a further 6 months to sort out legal and other admin duties before the property is let and occupied. Therefore to ensure that the site is no longer suitable for its permitted use, we feel that in this uncertain market, that by adding an additional 12 months will demonstrate no demand for the sites permitted use. However |

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| | | | this will be the maximum time required for marketing evidence (perhaps we should clarify this) and it is ultimately left to development control on a site-by-site basis to agree with the site owner the required marketing period. It is therefore considered that no action is necessary. |
| DM E4 | No consultation responses received | | |
| DM O1 | Freeman. D | (c) i - Is policy clear enough regarding existing incompatible uses e.g. house in park | It is considered that the policy is clear enough. |
| | | (c) ii - wording allows for net less and replace "linked" with 'directly related to' | Insert " ... or any other use ancillary to, or compatible with, the function of the open space, which is supported by an up to date needs assessment;" |
| | | (c) iii - wording "high quality design" would allow for non-compatible uses of high design | Use was restricted by point ii. |
| | GLA | insert reference to All London Green Grid SPG | Yes |
| | Greyhound Racing Authority | The text should acknowledge support for that schemes which can enable improvements to the existing public realm. | Existing Core Strategy policy requirements include "protect and enhance", which is considered sufficient in this instance. No action is therefore required. |
| | Merton Liberal Democrats | Given that many of the potential sites in the borough for development do not include existing open space, we are not convinced it is enough to consider merely whether a development would lead to a net loss of open space. | The policy was amended in accordance with the suggestion. |
| | Morden Park and Playing Fields Association | (c) "the proposals are for the redevelopment of an existing building within open space and they do not lead to a net loss of open space." Please may the words be added after "existing" - "or pre-existing." Given that the old pavilions on Morden Park Playing Fields have now been demolished, their footprint will be needed for | Agree with principle but this could be one of those exception situations for which policy should not be written. Use of the word 'pre-existing' would require a time limit as clarification. |

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| | | new changing rooms etc. | |
| | Natural England | Paragraph 6.6 referring to not causing 'significant' adverse impacts on species, habitats and landscape is welcomed and to be encouraged. However, the definition of 'significant' is debatable and can be open to local interpretation. The Council should give consideration to tightening this section. | No action needed. The text is in accordance with London Plan 7.19-C-c |
| | | This policy is broadly supported though the Council may wish to make references to the Natura 2000 site at Wimbledon Common also. | Action – the reference was made as suggested. The London Plan 7.19 C-c already refers to the protection of European sites. CS13g4 refers to the protection of SSSI and other sites of regional and local status. It might actually be helpful to point out that the SSSI is a European site. |
| | | "would like to see reference to creation of 'new open/green space' where appropriate, currently policy is passive" | Support for policy wording. No action needed. |
| | | "The Council should also give consideration to the potential for fragmentation and increasing deficiency of access, which could be offset by new open/green space as well as green chains/links or corridors, where appropriate." | Action – new text inserted to policy. London Plan 7.18 states "The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency." |
| | | 2nd letter slightly different : The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would also be in line with the councils aspiration to promote and increase walking and cycling opportunities and help to make the natural environment the "arteries and veins" of the borough. | No action taken. Fragmentation implies the loss of some open space. The existing policy tests (iii and iv) and CS13(a) will resist fragmentation and increased "deficiency of ACCESS" should not result due to CS13(b and c) |
| | | "Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This could be brought out more fully... " | There are sufficient policy drivers and assessment routes in the core strategy to promote the improvement and protection of the natural environment. The council has implement targets for sustainable design and construction that could |

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| | | | be justified within the borough. These sustainability standards include credits that relate to the delivery of quantifiable biodiversity actions. This gives the council the ability to negotiate on land, ecology and biodiversity issues with developers within a nationally recognised and accepted framework and according to a quantifiable methodology. These quantifiable approaches provides council officers with the tools to measure developers contributions core strategy policies relating to the protection and enhancement of the naturel environment. |
| | | generic comments about protected species and BAPs, and the LPA's duties to request survey information and their standing advice | Action – the suggested text is already in Merton's Core Strategy and the London Plan. No action is considered necessary. |
| | NHS South West London | Support for the policy | No action needed. |
| | Raynes Park and West Barnes Residents' Association (RPWRA) | Suggested word change. b) for will not be injured....replace with ' impaired ' or " harmed " | Significant amendments to the policy were made in subsequent plans. The wording was amended as suggested and the relevant part now refers to "harmed". |
| | | para 5.7 change "are likely to" to 'may' (to much of an invitation to developers) | Significant amendments to the policy were made in subsequent plans. The policy was amended as suggested. |
| | | para 5.8 change "normally" to 'preferably' See "should" in c) ii | Significant amendments to the policy were made in subsequent plans. The policy was amended as suggested. |
| | Skinner. R (Morden Park and Playing Fields Association) | (c) "the proposals are for the redevelopment of an existing building within open space and they do not lead to a net loss of open space." Add after "existing" - " or pre-existing. " | The policy wording relating to development on open space has since changed substantially to closer reflect the NPPF criteria. The proposed change would however not secure the |

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| | | | principles are alluded to in the representation. The demolished buildings were all ancillary buildings to the use of the public park. As ancillary buildings, the portions of the park on which they were erected, in planning terms, remained as open space. |
| Wimbledon Society | (a) Add: "...The Council will continue to protect MOL AND ANY DESIGNATED OPEN SPACES from inappropriate development....." The point being that it is not just MOL that needs protection, but all open spaces | | Insert "and designated open spaces from..." |
| Wimbledon Society | b) Add: ".....development conspicuous from MOL OR ANY DESIGNATED OPEN SPACES will be acceptable ONLY if the visual amenities of THE OPEN SPACE will not be injured...." and "..... DEVELOPMENT ADJOINING OPEN SPACES NEEDS TO BE WELL SET BACK TO PREVENT LOSS OF DAYLIGHT OR OVERLOOKING". | | Insert "or designated open spaces will only be acceptable..." |
| Wimbledon Society | (c) ii Add: "... The proposal should BE ANCILLARY TO THE OPERATION OF THE OPEN SPACE SUCH AS A PAVILION.... AND BE OF A SCALE THAT IS APPROPRIATE FOR THE OPEN SPACE ITSELF....." This would ensure that a previously inappropriate use eg a house would not be able to be rebuilt in the open space: and that a small open space would not have to accommodate an over-large building mass | | Insert " ... or any other use ancillary to, or compatible with, the function of the open space, which is supported by an up to date needs assessment;" |
| Wimbledon Society | P48 para 5.5 Add: ".....of open space. (full stop). However, many.....changing rooms. OPEN SPACES SHOULD NOT BE USED AS CHEAP SITES FOR THE DEVELOPMENT OF LEISURE FACILITIES THAT HAVE NO RELATIONSHIP TO THE OPEN SPACE, EG RECREATIONAL CLUBS, SQUASH ETC..." This makes it clear that only buildings that facilitate the use of open space are to be accepted | | Each case is assessed on its merits when deciding whether or not the leisure facility has a relationship with the open space. It may be that the addition of a squash club makes the new changing rooms for the football pitch viable. No change is therefore considered necessary. |

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| | Wimbledon Society | P49 5.6 “complements” | The policy was amended as suggested. |
| | Wimbledon Society | P49 5.11 Add: “.....protected from development proposals which would be visually obtrusive, OR AFFECT THE DAYLIGHTING OR PRIVACY OF THE OPEN SPACE, particularly” | Although development adjacent open space can be more conspicuous (e.g. than that of a mid-terrace infill site), many designated open spaces are small spaces within urban areas. MOL are large open areas of strategic importance to London and their “openness” is protected by London Plan 7.17. It would be inappropriate to specify the sensitivity of design impact for development on and adjacent to designated open spaces but not to refer in policy to the protection of their ‘open character’ as in many instances this might not be appropriate or relevant. It is therefore considered that no change is necessary. |
| DM O2 | Merton Conservative Group | DM O2. Trees, hedges and landscape features We support the principle of protecting trees, hedges and the natural landscape. However, we feel that the provisions for the replacement of trees which have to be felled should be stronger and would like to see the inclusion of a policy which states that any tree which is removed should have a like-for-like replacement. It is not acceptable that mature trees with large coverage can be felled and replaced by an inferior specimen. | Like for like it is unlikely to be feasible when it is a mature tree. No change is therefore considered necessary. |
| | Natural England | Provision of replacement features of a similar or greater value, where appropriate is welcomed and to be encouraged, using native species to increase and enhance the ecological and biodiversity of the area. | The text was amended in accordance with the suggestions. |
| | | The council should consider the role of the natural environment under this section/objective. Incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including | Action - although the comment was made regarding DM O2, as per the aim, this policy is with regards to the actual vegetation. The matters raised relate more to DM O1, which as |

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| | | through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect, increasing walking and cycling opportunities, promoting health and increasing access to nature and open spaces. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Core Strategy, and the policies linked to reflect this. | stated above is already in the London Plan, NPPF, the Core Strategy and in the SandP sustainability appraisal. |
| | | consider the potential for additional/increased Green Infrastructure provision, providing access and links to green/open spaces as per our comments above" | Action – additional text was added to the policy as suggested. |
| | Raynes Park and West Barnes Residents' Association (RPWBRA) | Amend to read "clearly" outweighs the trees amenity value | Action – the suggestion was considered and rejected. Adding "clearly" gets into the definition of "clearly". |
| | Stutt, C and I | We support policies which make it easier to protect holly hedges and other features which have a positive impact on our environment. | Support for the policy. No action needed. |
| | The John Innes Society | Support | Support for the policy. No action needed. |
| | Wimbledon Society | P50 (d) Add: ".....WHERE TREES ARE LOST, THE AGE OF THE REPLACEMENT TREES SHOULD MATCH THE AGE OF THE TREES THAT ARE TO BE REMOVED, AND THESE SHOULD BE PLANTED WITHIN THE DEVELOPMENT SITE. WHERE THIS IS NOT PRACTABLE, THE TREES SHOULD BE MADE AVAILABLE TO THE COUNCIL FOR PLANTING IN THE IMMEDIATE AREA....." This is to ensure that (say) 3 large trees with a combined age of (say) 100 years would not be replaced by 3 tiny saplings, but instead by (say) ten 10 year old saplings; (10 x 10 = 100); a new Merton Rule for tree replacements perhaps? | The text was amended in accordance with the suggestion. |
| | Wimbledon Society | P51 5.16 Add a note about the need for tree replacement | The text was amended in accordance with the |

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| | | (see above). | suggestion. |
| DM D1 | English Heritage | Considers that ... DM D1 concerning design would benefit from the inclusion of a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised. | Regarding DM D1 - Yes, DM.D1(a) amended to read "Relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area |
| | GLA | GLA are supportive of this policy as a local response to strategic urban design aims of the London Plan. But reference should be made to accessibility to all principles of design of the public realm (London Plan policy 7.5). under e) reference should be made to connection to local features such as the Blue Ribbon Network (policy 7.27) The text references a range of design guidance documents (paragraph 6.37) this should include the GLA London Housing Design Guide (August 2010) | Consider change to include references to relevant LP Housing Design Guide Aug 2010 and Mayor's Housing SPG November 2012. However omit the following suggested addition <i>such as the blue ribbon network and parks and others that may be of heritage significance... (LP policy 7.5 [c])</i> . The Blue Ribbon Network is peripheral to the point that is being made in DM D4(e) as it is about streets and the spaces connected to them and has very little to do with an open space network, still less to do with water related activities. Policy DM D4 concerns the creation of an environment that is easy to move through and mitigates against areas of land that are poorly accessible such as cul-de-sacs and gated developments and large buildings of land with no network of public streets. Linkages to the green grid (which includes the blue ribbon network) are appropriately covered in the CS open space policy and the Wandle Valley Park Sub Area policy (NB: The Blue Ribbon Network is covered in the Mayor's All London Green Grid and at local development plan level in the Wandle |

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| | | | Valley Area Framework and the Thames Development Framework). |
| Greyhound Racing Authority | <p>DM D4: Urban design and the public realm</p> <p>As outlined above in the response to draft policy DM D1, urban design and public realm principles are acknowledged; however, the text must confirm that each proposal is assessed on its individual merits.</p> <p>The policy text should also emphasise the need to assess proposals on the basis of their improvements to the existing public realm.</p> <p>A fundamental element of public realm improvement relates to providing a mix of land uses. As mentioned previously, large residentially led-mixed use developments with the critical mass to create a vibrant living, working and social 'place' and deliver significant public realm improvements should be supported.</p> | | <p>The justification text was updated to include the following clarification concerning public realm: Proposals will be assessed based upon principles of good design and placemaking. The Council will be seeking high quality public realm irrespective of the existing state. The existence of poor public realm should be no justification for average or mediocre proposals for public realm. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development including individual buildings, public and private spaces and wider area development schemes. Developments are expected to ensure the establishment of a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. All developments irrespective of size should be able to deliver public realm improvements. Public realm improvements cannot be used to justify inappropriately large dense proposals that do not accord with other development plan policies. Successful public realm is not solely dependent on having a mix of uses. Rather, having appropriate uses in appropriate locations will be the basis of a successful public realm. This may not necessarily require mixed use.</p> |
| Greyhound Racing Authority | Notwithstanding the above, based on adopted London Plan minimum housing targets of 320 dwellings per annum, LB Merton's latest housing trajectory (2010/2011 Annual | | The Colliers Wood / South Wimbledon AFI target for 1,300 additional homes was originally set in the 2008 London Plan and has been rolled |

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| | | <p>Monitoring Report, January 2012) identifies a 5 year land supply of only 1,655 dwellings. When the additional 20% required by the (soon to be adopted) Draft NPPF is taken into consideration, the Council's 5 year land supply demonstrates a shortfall of 255 dwellings.</p> <p>Projected housing supply from years 6-10 of the housing trajectory (2017/2018 – 2021/2022) identifies only 547 dwellings. This equates to a shortfall of a significant 1,053 dwellings. From years 11-15 (2022/23-2026/27), the housing trajectory identifies a housing supply of 751 dwellings, equating to a shortfall of 849 dwellings.</p> <p>In total, from 2012 to the end of the Plan period the Council have identified a land supply of 2,963 dwellings which equates to a shortfall of 1,837 dwellings (excluding the additional 20% in the first 5 years). When this is compared against the ONS' Household Projections (a need for approximately 7,000 dwellings), there is a significant shortfall of circa 4,000 dwellings over the Plan period.</p> | <p>forward into the current 2011 Plan. In the period 2001-2008 approximately 1,360 net new homes were built exceeding the published 2008 London Plan target. In Merton's adopted Core Planning Strategy the Colliers Wood and South Wimbledon sub-area have been identified to provide between 500-600 additional new homes throughout the plan period. However this is subject to environmental factors, of which flood risk is one such pertinent factor.</p> |
| | <p>Mayor's Office for Policing and Crime/ Metropolitan Police Service</p> | <p>additional wording is required in Policy DM D1, section a, sub section (iii) to make reference to Secured by Design: <i>'(iii) Provide layouts that are safe secure and take account of crime prevention and are developed in accordance with Secured by Design Principles'</i>.</p> | <p>Action – the text was amended as suggested.</p> |
| | <p>Merriman, D</p> | <p>paragraph 6.4 50sqm relates to back and front gardens or just back?</p> | <p>If there is any reference to usability of the space (which there should be in terms of its location and shape and relationship to the dwelling it serves), then this essentially means that it has to be a back garden. It is difficult to design front gardens that have enough privacy without causing other problems such as reduced surveillance, blank frontages and blurring the</p> |

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| | | | front/back definition. |
| Merton Conservative Group | <p>Whilst the detail of acceptable design will be forthcoming in a design SPD, we are concerned that the Council will welcome 'innovative, contemporary and sustainable design' without any explicit regard to its surroundings.</p> <p>Any proposed design policy must ensure that any planning application compliments those properties which both neighbour it and are within its vicinity. Many parts of Merton contain buildings of architectural merit which have been allowed to have buildings which are not in keeping with them to be built on neighbouring plots. This cannot be permitted under any future design policy.</p> | | Noted. No change. |
| Natural England | Broadly supports this policy, especially a) (ii) in respect of the natural environment, biodiversity and natural habitats. The provision of green infrastructure and biodiversity enhancements in development applications is to be welcomed and encouraged, this policy can also be used to link into Policies DM O1 and DM O2 where appropriate. | | Noted. The Local Plan documents are to be read as a whole and proposals are assessed against all relevant policies, such as DM O1 and DM O2 where appropriate. |
| Raynes Park and West Barnes Residents' Association(RPWBRA) | To add a bit more emphasis. Amend to read will "normally expect "a minimum | | Noted. No change proposed as the wording "will be expected to meet all the following criteria.." provides appropriate clarity. |
| Workspace Group | Concern with paragraph. 6.4 of the policy is considered a reflection of the 1999 New Residential Development SPG which specifies the minimum garden area that the council will seek in relation to new development. The respondent considers this to be overly prescriptive and not allowing development to maximise full potential. | | The general character for Merton is suburban and an important part of the suburban character is provided by reasonable sized gardens. A 50m ² garden will generally be 10m deep therefore creating a 20m separation distance between the backs of houses which is comparable to well established guidelines in terms of privacy etc. Therefore this should not have a negative affect on achieving appropriate |

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| | | | <p>residential densities. Like the existing SPGs, the Design SPD supports the development plan rather than informs it. The 5m² standard for private amenity space referred to by the respondent is derived from the London Plan. Whilst the London Plan SPG only provides private amenity space standards for flatted development it does not cover all the space required such as private communal amenity space and it should be noted that private and communal amenity space have different roles and purposes therefore it is appropriate to seek to provide a mix of both in new developments. Action: revise reference in justification text to private amenity space to include reference to the London Plan garden space standards regarding flatted development. Include clarifications regarding usability of garden space and also flexibility regarding the specified standards.</p> |
| | Wimbledon Society | Add URBAN before design and LOCAL DISTINCTIVENESS in policy aim | Disagree. It may not be appropriate in all places to reinforce local distinctiveness. It may be appropriate in some places to create a landmark building which creates its own character and distinctiveness. Other locations may not have existing locally distinctive character. Reference to character of wider setting, character of the surrounding area are already included and these are considered sufficient references. |
| | | Add BUILDING LINE to point (i) of policy | Disagree. Too detailed for DPD document, more appropriate to address in SPD. Adequately covered under the term " <i>relate positively and</i> |

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| | | | <i>appropriately to the siting...</i> " Details concerning siting, such as building lings can be appropriately dealt with in the Design SPD. |
| | | Add NATURAL CROSS VENTILATION to both adjoining buildings AS WELL AS GARDENS, POTENTIAL DEVELOPMENT LAND and OPEN SPACES to point (v) of policy | Disagree. Gardens are covered by amenity space ref. Open spaces not relevant to this policy and covered elsewhere - point (iv) concerns provision of amenity space and DM D4 includes green infrastructure provision. Ventilation inside flats is covered elsewhere in London Housing Design Guide, the mayors Housing SPG and will be covered in Merton's Design SPD. |
| | | Add ENCOURAGE INNOVATIVE ARCHITECTURAL IDEAS and ensure.... To the SA section | Disagree. Inappropriate reference location. Point (ii) of policy adequately cover this. |
| | | Add "USABLE consolidated area" with reference to garden area | Agree added the word USABLE |
| DM D2 | English Heritage | Considers that ... DM D2 about alterations and extensions would benefit from the inclusion of a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised. | Regarding DM D2 - No change proposed to DM.D2 as criterion (ii) and criterion (v) already reference context of building and wider setting (whether historic or otherwise) |
| | GLA | A strategic consideration that should be included is retrofitting of climate mitigation measures (London Plan policy 5.4). | In December the Government announced that it would no longer be introducing legislation to require 'consequential improvements' to the energy efficiency of a dwelling - whereby work on one part of a home (e.g. extensions or loft and integral garage conversions) would trigger a requirement to carry out energy efficiency improvement works throughout the property – see: https://www.gov.uk/government/speeches/minor-consequential-improvements The GLA's recommendations obviously pre-date this |

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| | | | <p>announcement, but it would appear that the comments are no longer in line with central government policy. Therefore it would be inappropriate to require existing dwellings to retrofit climate change mitigation measures through the DM D2 policy.</p> <p>As an aside, our Domestic Domestic Refurbishment (Conversions to provide new dwellings) condition already requires conversions to create new dwellings to use the BREEAM domestic refurbishment standard – and we will be shortly proposing a minimum requirement to achieve a rating of ‘Very Good’ for this standard. So we are in effect already taking steps to ensure that cc mitigation measures are retrofitted into existing buildings.</p> |
| | Merton Liberal Democratic Group | <p>We note there is no mention of affordable housing (this may be because other policies consider this) – but we feel this is an essential part of creating socially mixed communities in line with the aim of this policy. However, we were concerned by recent planning applications that have managed to avoid the 40% affordable housing target “due to viability issues”. The said viability issues largely relate to the value of the land which has decreased since purchase. However, the conditions placed to review the viability of affordable housing on the site, just prior to development, or immediately after development, would still allow a site owner willing/able to sit on the development (after building) until the land value is more favourable, to sell on the site, minus an element of affordable housing.</p> | No change. |
| DM D3 | English Heritage | Support with caveat that conservation should not prevent | Satisfying conservation aims is not in conflict |

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| | modernisation of healthcare facilities. | with the modernisation of facilities therefore no change to the policy is considered necessary. |
| | Regarding managing heritage assets, although we are puzzled as to the inclusion of a reference to a World Heritage Site in paragraph d, as the borough does not have one and is not responsible for a buffer zone for such a site either. | Agree – changes made |
| Merton Conservative Group | We are concerned with the inclusion of paragraph C in this section. The Council must resist any planning proposals which would seek to do substantial harm to our heritage assets under all circumstances. We would therefore like to see this paragraph strengthened through the inclusion of a requirement for a strong and public case being demonstrated to justify the proposed harm to be inflicted on the asset. | It is considered that the policy affords an appropriate degree of protection to heritage assets. |
| Merton Park Ward Residents | With regard to managing Heritage Assets, we are concerned that the qualification of the policy “where substantial public benefits outweigh the harm or loss” could be open to controversial interpretation. In instances where the Council itself is the landowner, would the provision of S106/CIL monies by the applicant, in addition to the sale proceeds, be deemed to be for the greater good? We would suggest that where the landowners are the Council itself or another public (or quasi-public such as a water company) then financial gain should be specifically excluded as sufficient grounds for approval. | The overarching aim of the policy is to protect the borough’s heritage assets. The wording of this policy is in accordance with the NPPF (March 2012). No change to the policy is therefore considered necessary. |
| Stutt. C and I | We do not support the wording which allows asset stripping of the Borough’s assets. In particular we do not support ‘where substantial public benefit outweigh the harm or loss’ or ‘the harm or loss is outweighed by the benefit of bringing the site back into use’. | The overarching aim of the policy is to protect the borough’s heritage assets. The wording of this policy is in accordance with the NPPF (March 2012). No change to the policy is therefore considered necessary. |
| The John Innes Society | The wording of this policy is weaker than UDP Policy BE2 which it seeks to replace, and we do not support the qualification of the policy “where substantial public benefits outweigh the | The wording of the policy is in accordance with that set out in the NPPF (March 2012). The wording was therefore not changed. |

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| | | <p>harm or loss" and the harm or loss is outweighed by the benefit of bringing the site back into use". We consider that to be an invitation to landowners to allow their properties to deteriorate so that they can plead a development should be allowed even though it does not meet the criteria which would have applied had UDP Policy BE2 still been in force, because it is for the greater good".</p> <p>We are particularly concerned that there is no definition of "public benefit".</p> | |
| | Wimbledon Society | <p>P56 f (i) In addition to the list of "building elements" it is important to mention that the character of a listed building also often depends on room shapes and their proportions, so works which change these may significantly damage the building's historical integrity.</p> | <p>Agree - Insert after "architraves" "as well as proportions of individual rooms." Remove apostrophe from "it's" .The issue of good design is addressed in policy DM D2 and applies borough wide so no change proposed to this element of response.</p> |
| DM D4 | Greyhound Racing Authority | <p>Whilst the council's aspiration for high quality design is acknowledged (part (a)), it is important that each proposal is assessed on a site-by-site basis, and that the cost of accessibility, crime prevention and adaptability guidance does not impact the viability of a scheme. We will comment on detailed design guidance to be contained in Merton's Design SPD when it is published in Autumn this year.</p> | <p>No action needed.</p> |
| | Mayor's Office for Policing and Crime/ Metropolitan Police Service | <p>An additional section should also be added at section (j) of Policy DM D4: <i>(j) All development should be constructed in accordance with Secured by Design Principles</i></p> | <p>The design policies were amended and now include reference to Secured by Design principles.</p> |
| | Merton Conservative Group | <p>Whilst agreeing with most of the points made in this section, we would like to see Policy (h) strengthened, and instead seek to discourage the conversion of front gardens for vehicle crossovers on roads with light traffic flow, encourage the use of permeable surfaces where they are permitted and ensure that there is a minimum distance which is enough to</p> | <p>It is not clear what the "average" size of a car is. Officers advised that vehicular crossovers on unclassified roads do not need planning permission instead they apply directly to highways who have regard to Merton's Vehicular crossover information pack. If the proposed</p> |

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| | | <p>fit an average size saloon car without having the rear of the vehicle protruding over the pavement.</p> <p>We would also like to include a section within this policy which requires the council to adhere to its own Public Realm Strategy and also commits to only using 'high quality materials'.</p> | <p>vehicular crossover is on a classified road then this will require planning permission, in which case policy DM T3 will apply and relevant guidance including the vehicular crossover info pack. No action is therefore considered necessary in relation to this policy.</p> |
| | Merton Liberal Democratic Group | <p>We feel that this policy is hugely important – we would like to see stronger provision made in relation to requiring developments to “relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings”</p> | <p>Considered. Substantial changes to the design policies were made following receipt of this representation. No further changes were requested by the Merton Liberal Democratic Group following these changes.</p> |
| | Merton Priory Homes | <ul style="list-style-type: none"> • We are pleased that the work of Circle on affordability is highlighted and that remains our committed position. • The approach is not aligned with the London Plan which focus upon affordable rents – there is evidence of challenge already (Islington) and how far are you prepared to go to defend your position • There would be a need to support RP's in other ways if you hold the line on requiring social rent as the grant regime considers only affordable rents | <p>Considered. Substantial changes to the design policies were made following receipt of this representation. No further changes were requested by Merton Priory Homes following these changes.</p> |
| | Natural England | <p>The Council and developers should give consideration to “soft landscaping” and green infrastructure where appropriate also.</p> | <p>Changes to the policies were made in accordance with the suggestion.</p> |
| DM D5 | British Sign and Graphics Association | <p>DMD5 should refer to granting of express consent as planning permission is not granted for adverts</p> | <p>Amend for clarity: the council has legal agreement with JC Decaux until 2019 that they can apply for planning permission to provide adverts on the public highway. No change to the policy is therefore considered necessary.</p> |
| | Outdoor Media Centre | <p>Remove "defined" as unclear in design terms</p> | <p>The text was amended as suggested.</p> |

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| | | Paragraph 6.43 of the policy should be edited for clarity | The text was amended as suggested. |
| | | The council own the public realm therefore they have full control over the placement of advertisements displayed therein as landowner. | Transport for London is the owner of much of the public realm. The text was amended for clarity. |
| | GLA | There is a need for a policy referencing the new affordable rent product relating to the minor alteration to London Plan and GLA Draft Housing SPG | A new policy was introduced as suggested. |
| | | Need for student housing policy and accommodation of such developments within the borough as this is a strategic priority. | A new policy was introduced as suggested. |
| | | GLA are generally supportive of this policy as a local response to a strategic aim under London Plan policy, however it would be improved through reference to: London Plan housing space standards under policy 3.5 (table 3.3); policy 4.5 hotel developments should have 10% wheelchair accessible bedrooms; policy 7.7 student accommodation should incorporate 10% wheelchair accessible units or easily adaptable for wheelchair users. | Substantial changes to the design policies were made following receipt of this representation. No further changes were requested by the Merton Liberal Democratic Group following these changes. The policies was amended in accordance with the suggestion. |
| DM D6 | Merriman, D | A safeguard to ensure no new BandB type uses are permitted in residential areas. However if, exceptionally, such new use is permitted then it must satisfy a provision along the lines of "...they will not have an adverse affect on local community and local environment". | Noted. The plan is to be read as a whole and proposals are assessed against all relevant policies, such as DM D1 which aims to protect local and residential amenity. |
| | Mobile Operators Association | Support for the policy. | No action needed. |
| DM D7 | British Signs and Graphics Association | Paragraph 6.52 is grammatically incorrect | The text was amended for clarity as suggested. |
| | | Clarification on the use of "residential amenity" | The text was amended for clarity as suggested. |
| | | Clarification on the use of "reflect....traditional" | The text was amended for clarity as suggested. |
| DM EP1 | Workspace Group | Opportunities for decentralised energy networks. Will decentralised energy be supported outside of identified opportunity areas (Colliers Wood, Morden and Mitcham) | Yes decentralised energy will be encouraged through the use of the lord mayors energy reduction hierarchy and all planning applications |

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| | | | will be expected to consider the potential for reducing emissions through the use of CHP. The decentralised energy opportunity areas have been identified in order highlight the areas with the greatest potential for establishing decentralised energy and developments within these areas will be expected to demonstrate compliance with Core Strategy Policy CS15d and demonstrate how they contribute to any existing or planned decentralised energy network. |
| DM EP2 | No consultation responses received | | |
| DM EP3 | No consultation responses received | | |
| DM EP4 | English Heritage | English Heritage notes that this policy is identified as having a positive impact on the historic environment which we welcome. We strongly recommend that paragraph 1.15 include the need for someone with heritage conservation skills to be included in the proposed allowable solutions working group; | Specifying personnel regarding the working group is not relevant to the development of the Sites and Policies Plan therefore no action is needed. DCLG have launched their allowable solutions consultation which Merton Council is involved with. To be considered in developing the policy. The outcome of this consultation will impact upon policy DM EP4 . |
| | GLA | Allowable solutions. GLA is supportive of this policy | Support for the policy. No action needed. |
| DM F1 | Environment Agency | There is need to mention our role in flood emergency planning after paragraph 8.6. | Action – no action needed as this is already mentioned paragraph 8.3 and is reiterated in the flood zone table. |
| | Raynes Park and West Barnes Residents' Association | a i "the sequential test". A reference point in needed. Suggest adding " as required by (the former) PPG 25 " or perhaps Policy CS 16 of the Core Strategy. | Action – a foot note was added for clarification. |
| | Wimbledon East Hillside Residents' Association | iv) Add All new developments must contain at least (50% ?) rainwater harvesting, e.g. could be used for toilet | Action – both points are already referred to in Policy DM F2 therefore no action is |

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| | (WEHRA) | flushing, watering trees, washing machines). v) Add. New developments will not be permitted to 'mass pave' land currently green. There must be permeable paving if paving is required, and full rainwater harvesting (to compensate for developing an area that previously was used for water run off). | considered necessary. |
| | Workspace Group | Minor development and change of use should not be subject to the Sequential and Exceptions test. | Whilst the aim of the sequential test is to steer new development to areas of low flood risk- NPPF and Technical guide does not make reference to change of use and minor development. The aim of the policy is to ensure that flooding from all sources are considered –e.g. surface water, ground water, fluvial, pluvial, drainage and water sewer infrastructure and any development does not increase flooding at the site area, to existing building and surrounding area. It would depend on the area and the change of use proposed. I would assume that DC would advice accordingly. The Environment Agency made no reference to this is issue. |
| DM F2 | English Heritage | Requests concerning sustainable drainage systems are amended to include a reference to the need for such solutions to be appropriate and/or design appropriately for the context in which they are to be located. | Policy now reads -'All new developments have to consider Sustainable Drainage Systems (SUDS) where feasible or demonstrate alternative sustainable approaches to the management of surface water in line with the emerging National SuDS standards and SuDS Management Train'. - The National Suds' Standards incorporate design issues so |

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| | | | hopefully this matter raised is addressed. |
| | Natural England | Natural England welcomes and encourages the use of SuDS where appropriate. | Support for policy. No action needed. |
| | Thames Water | <p>Consider that the policy does not adequately cover water and sewerage infrastructure which is essential to all development. We consider that either Policy DMF2 needs to be amended to refer to water and sewerage infrastructure or there should be a new Policy dealing with water and sewerage infrastructure. Suggested wording for news policy.</p> <p>Take account of the capacity of existing off-site water and sewerage infrastructure and the impact of development proposals on them. Where necessary, the Council will seek improvements to water and/or sewerage infrastructure related and appropriate to the development so that the improvements are completed prior to occupation of the development.</p> <p>The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</p> <p>“PROPOSED NEW POLICY SUPPORTING TEXT_ The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both</p> | Action – the comments were taken on board and the policy amended accordingly. The relevant text was included as parts viii and ix of policy DM F2. |

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| | | on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer | |
| DM T1 | GLA | Slight rewording to policy | The policy was amended in accordance with the suggestion. |
| | Natural England | Council should consider potential to link green spaces to provide green chains/open spaces as well as services and facilities | Policy DM T1(c) was amended in accordance with the suggestion. |
| | NHS South West London | Add to end of policy: ... and increase physical activity levels | Action – the text was amended as suggested. |
| | The John Innes Society | We would like to see an additional policy to ensure that no residential area is more than 400 metres from public transport availability. This policy has worked well for Merton Park in the past, and resulted in the K5 hail and ride bus service, providing a bus for residents who would otherwise live a long way from the main road bus routes. | Transport for London who are responsible for assessing new bus services generally seek to ensure that areas of population are within 400 metres of a bus services, although the 400 metres distance (5 minutes walk) is guidance rather than a requirement. The primary consideration used by TfL when making a decision on a new route is that the proposal is cost effective. Benefits might include changes in travel and waiting time, although other factors, such as social deprivation or new development can also play a role in deciding the outcome of any bus review. The conclusion of any route review must show a substantial benefit, ideally at least twice the cost of providing the service. Merton is well served by public transport, including by bus. The thrust of Merton's |

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| | | | Transport policies promote sustainable transport. The accessibility of an area/development needs to be explored from a multi-modal perspective, which would be undertaken as part of any associated transport assessment or transport statement in particular (refer to policy T2 and T4). Policy T1 also supports this approach. It is therefore considered that sufficient policy direction is in place and that a separate policy requirement for buses is not required. |
| DM T2 | English Heritage | Policy DM T2 <i>Consideration of transport impacts of development</i> | No changes made to policy as whole thrust is towards sustainable development and any major/significant proposal would also have to prepare a Transport Assessment this would need to assess the impact of all modes including public transport. Further policy direction is included elsewhere in the Design policies |
| | Environment Agency | Recommend changes to the supporting text to reflect the emerging National Standards for SUDS. The Flood and Water Management Act 2010 will introduce far-reaching requirements for SUDS on future construction work. When the Act takes effect, applicable construction works will not start until drainage systems have been approved by 'Approving Bodies' in line with national standards for SUDS. Supporting text on the role of the SuDS Approving Bodies. | Action- the policy has been rewritten to include this more strongly and is in the justification paragraph 8.22. |
| | Greater London Authority | Slight rewording to policy | The policy was amended in accordance with the suggested wording. |
| | NHS South West London | Support | Support for policy. No action needed. |
| DM T3 | Greater London Authority | No comment | Support for policy. No action needed. |

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| | Mayor's Office for Policing and Crime/Metropolitan Police Service | Specific point should be added to policy DM T3 to reflect the London Plan position h) Provision for parking at ambulance, fire and policing facilities will be assessed on their own merits. | Action - although the London Plan parking standards are adopted by LBM the policy was amended by adding proposed item h) as worded for clarity. |
| | Merton Conservative Group | The council should require more sites to include appropriate parking on site | Review against proposed changes to London Plan standards |
| | Metropolitan Police Service (MPS) | Policy should include car parks should have measures in place that deter criminal activity and create a safe environment for both people and vehicles. | Although London Plan parking standards adopted by Merton. Add proposed item h) as worded for clarity. |
| | NHS South West London | Support | Support for policy. No action required. |
| | Sainsbury's | States the needs and importance of car parking in town centres | The policy recognises the need for an appropriate level of parking and servicing as demonstrated by a transport assessment. |
| | Workspace Group | Support London Plan standards and reference to PTAL and local circumstances | Support for policy. No action required. |
| DM T4 | Greater London Authority | Slight rewording to policy | The text was amended as suggested by removing reference to Mitcham and Tooting Tram and additional supporting paragraph for trams. |
| | NHS South West London | Support | Support for policy. No action needed. |
| | Wimbledon Society | DM T4 - Add a policy that gated development should be avoided | Agreed that the inclusion of an additional policy dealing specifically with gated development was not required for the Sites and Policies Plan. However additional references to gated development as appropriate would be included in relevant policies supporting text namely; DM D4, DM T5 and DM H2 |
| DM T5 | Greater London Authority | Cross reference to London Plan Text | No clear reference was made to what the cross reference should be with. The Sites and Policies Plan is required to be in general accordance |

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| | | | with the London Plan. |
| | NHS South West London | Support | Support for policy. No action needed. |

Table 2: Summary of representations received during Stage 2/2a regarding development policies

| Section | Respondent | Comments from respondent | Action/Comment |
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| Policy - general | Wimbledon Society | An additional policy is needed on the re-conversion of flats back into single houses, which is resulting in a net loss of housing stock (see Core Strategy Policy CS9a). | No action needed. This is adequately covered by the Core Strategy policies CS9 and CS14. |
| Appendix D | Wimbledon Society | Suggestion made that the local list should be included in Appendix D | The local list is available on the website where it can be kept up to date. The Sites and Policies Plan covers a 10 year period and therefore inclusion of the list here would outdate the document given the duration covered. No action needed. |
| Policies map – industrial areas | London Fire and Emergency Planning Authority (LFEPA) | The change of the Strategic Industrial Land at Shannon Corner to Locally Significant Industrial Site is not supported. Due to retail warehouses, supermarket and being located in a heavily populated residential area, there consider that the designation for industrial use to be inappropriate. They are of the opinion that the area should be designated as mixed use, including residential allocation. | No action required |
| Policies map – industrial areas | Nicholson. J | He notes that draft proposal map revision that propose to designate three sites in Burling Road/ Malden way Area as Industrial - only objects to this as residential properties are located within close | No action required |

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| | | proximity. If is percieved that if this change is approved it will prove even more difficult to refuse inappropriate and unwelcome planning applications in this part of west Barnes Ward. | |
| Policies map - general | Wimbledon Society | Generally supportive though had significant issue with the layout of existing pages in Section 111: Policies map. Highlights that this should be more in line with retail hierarchy. Highlighted a number of changes with proposed neighbourhood boundaries. | Consider and update when appropriate. |
| Policies map - neighbourhood parades | Co-operative Group | Issue with the proposed boundary drawn for 1D9: Grand Drive (300-372 Even) - argue for the proposed boundary to reinstate the car par boundary. Also have issues with the proposed neighbourhood boundary drawn for ID24: Wimbledon Chase - argue for the proposed boundary to include the car park. The reasons for these request is due to the comprehensive redevelopment of the existing Co-op sites for mixed use | The maps give effect to policies regarding the protection of existing uses, not to allocate new areas for development. No action required. |

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| | | development which will include the existing car park sites. | |
| Policies map - neighbourhood parades | GLA | The GLA are supportive of these designations. | No further action required. |
| Policies map - neighbourhood parades | Wimbledon East Hillside Residents' Association (WEHRA) | Would like to include shops on Wimbledon Hill Road as neighbourhood parades as they serve a 'dual purpose' - local parade of shops to nearby residents as well as being part of Wimbledon town centre. The section of Wimbledon Hill Road is designated as a Secondary Shopping Frontage in existing plans and consists of a number of estate agents as well as shops for sale. | No further action required. |
| Policies map – shopping frontages | GLA | The GLA are supportive of these designations. | No further action required. |
| Policies map – shopping frontages | Wimbledon East Hillside Residents' Association (WEHRA) | Wimbledon Hill Road and Worple Road to be designated as a Core Frontage and disappointed that Wimbleondon Library is located in the Secondary Shopping Frontage. | No further action required. |
| Policies map – town centres | Apostles Residents Association | Object to the revised local centre boundary for Raynes Park - argues no explanation or reasoning. Form part of the Raynes Park Residential | We considered this response, in addition to other responses received (even through meetings), and revised the Town Centre Boundary for Raynes Park. |

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| | | Association - identify and public realm improvements - Raynes Park Local Centre Enhancement Plan. They would like the existing UDP boundary to be used and stretched to include residential areas. | |
| | Colebourne. S | Disagrees with the removal of the all of the area south of the railway line in Raynes Park. | We considered this response, in addition to other responses received (even through meetings), and revised the Town Centre Boundary for Raynes Park. |
| | Dundonald Ward Councillor Chris Edge | Endorse the Raynes Park Association comments to plan for continued growth in Raynes Park needs to be retained. | We considered this response, in addition to other responses received (even through meetings), and revised the Town Centre Boundary for Raynes Park. |
| | Fischer. P | Object to the revised local centre boundary for Raynes Park - argues no explanation or reasoning. Form part of the Raynes Park Residential Association - identify and public realm improvements - Raynes Park Local Centre Enhancement Plan. They would like the existing UDP boundary to be used and stretched to include residential areas. | We considered this response, in addition to other responses received (even through meetings), and revised the Town Centre Boundary for Raynes Park. |
| Policies map – town centres | GLA | The need to clarify that Colliers Wood is not a designated town centre. | Update this section of the document to reflect policy DMR1 and Core Strategy. |
| Policies map – town centres | GLA | Proposed change from a Strategic Industrial Location to a Locally Significant Industrial | Noted - update plan to make this clear. |

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| | | Area. GLA accept in principal that the Strategic Industrial Land designation can be changed to Locally Significant Industrial Area. However the re-designation will have to go through the London Plan Review process scheduled for approximately 2013- 14 before it can be fully validated. | |
| Policies map – town centres | London Borough of Croydon | Supports refocusing of town centre boundaries within the core of each town centre and are proposing a similar action for Croydon with a review of the shopping frontages. | Consider the Raynes Park boundary further - may consult with residents in Raynes Park and explain the retail policies and designations further. |
| Policies map – town centres | Perry. C Perry. K Place Design and Planning Raynes Park Association Resident's Association of West Wimbledon Wimbledon Society | Object to the revised local centre boundary for Raynes Park - removes all the area south of railway line for the centre where there are a large number of businesses and shops. Also shows worsening neglect of the centre south of the railway while more money continues to be spent on the centre north of the railway line. Is of the opinion that this arbitrary drawn town centre boundary line will further divide the town centre. | We considered this response, in addition to other responses received (even through meetings), and revised the Town Centre Boundary for Raynes Park. |
| Policies map – | Waitrose Limited. | Supports the revised town | Noted. No change requested. |

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| town centres | | centre boundary for Raynes Park. | |
| Policies map – town centres | West Barnes Ward Councillors Jeanes, M-J and Dysart. I | Concerned that the southern part of Raynes Park (Approach Rd, Kingston Rd and the Apostles) is not included within the proposed new boundaries. The UDP 2003 correctly includes the parts of Raynes Par on both sides of the railway. | Consider the Raynes Park boundary further - may consult with residents in Raynes Park and explain the retail policies and designations further. |
| Policies map – town centres | Wimbledon Society | Wimbledon 1) Deletions 0 S of Worple Rd, opposite Malcolm Rd; S site of Alexandra Rd. Additions - Queens Rd, N side of B roadway. This boundary makes no allowance for increase in size of Centre - is this right for 15 year time-span? | To re-look at changes made and consider tightening the town centre boundary further. |
| Policies map – town centres | Wimbledon Society | Raynes Park - Significant extension to E, S of the Railway? What lies behind extension proposal (area appears to be purely residential?) | To re-look at changes made and consider tightening the town centre boundary further. |
| Policies map – town centres | Wimbledon Society | Arthur Road: Support new proposed town centre boundary | No further action required. |
| Policies map – open space or similar issue | Gibson. P | Why is the land alongside the tram tracks, adjacent to the footpath from Dundonald Road to Alt Grove, proposed to no longer be a SINC or a Green Corridor. | This land is known as the 'Wimbledon to Dundonald Road Tramlink' and is a Site of Importance to Nature Conservation (SINC) (Ref. MeBII01D), which is borough importance grade two. Map Ref. i13, in the January 2012 (Stage 2) consultation document, erroneously showed amendments to the SINC's boundary in this location. The latest maps now show that this land |

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| | | | is within the above referred SINC boundary. The Green Corridor boundary has also since been amended to extend across the full width of the land reserved for the tram line in this location, but only the hard standing areas associated with the Dundonald Road Tramstop platforms have been excluded from the Green Corridor. |
| Policies map – open space or similar issue | Mitcham Cricket Green Community and Heritage | Welcome inclusion on the policies map of the boundaries of Wandle Valley Regional Park. | Support for the boundary. No action needed. |
| Policies map – open space or similar issue | Mitcham Cricket Green Community and Heritage | welcome inclusion on the policies map of the bowling green, tennis court and copse in the Canon's grounds as new open space | Support. No action needed. |
| Policies map – open space or similar issue | Mitcham Cricket Green Community and Heritage | welcome inclusion on the policies map of the Commonsides Rough as a new Site of Interest for Nature Conservation | Support. No action needed. |
| Policies map – open space or similar issue | Moat Housing | The Council seek to identify Donnelly Green (M014) on South Lodge Avenue as an area of open space. Moat strongly objects to the inclusion not previously allocated as open space within the Unitary Development Plan (2003). Pollards Hill (M059), Recreation Way and Harris Academy (M032) on the emerging Policies map, both which are situated in close proximity to Pollards Hill Estate. | Donnelly Green is listed as one of the protected open spaces in Schedule 2 of the adopted UDP (p.270) which is less than 4ha (2.35ha) and for that reason only is not shown on the Policies map. The open space conforms with the definitions of open space in the NPPF and The London Plan, and meets the council's criteria set out on p.369 of the January 2013 (Stage 3) consultation document. |

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| | | <p>Additionally, the site benefits to proximity to Mitcham Common which is a 218 hectare site of Metropolitan Open Land . In summary, there are other areas of higher amenity value within the vicinity of the site and it is considered that this area of land could more effectively accommodate new residential accommodation for the Estate to meet specific needs and demands of the Estate and the wider local area. The existing (and potentially new) Estate's residents will be able to access these nearby open space areas.</p> <p>infill development or a more comprehensive redevelopment of the Estate could bring forward many other planning, socio-economic and environmental benefits for the local community including potentially much needed elderly accommodation or additional mixed tenure accommodation as part of the Estate's future regeneration. This regeneration approach could also enhance the visual appearance of the</p> | |
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| | | <p>Estate itself and its local surroundings. On this basis, this area should not be constrained by an open space designation in terms of restricting the future regeneration of the Estate. Infill proposals would also provide opportunities to upgrade other pockets of open space in and around the existing blocks on site and improve permeability through the site to provide more usable space. This infill development approach (as well as a more holistic redevelopment approach) could also allow further opportunities for a well designed high quality landscaped scheme. This would create benefits to residents and result in a higher quality and useable amenity space for the Estate and improve the visual amenity of the local area to result in a more pleasant and secure environment.</p> | |
| <p>Policies map – open space or similar issue</p> | <p>Capital Gardens Limited (Morden Hall Garden</p> | <p>The site is currently covered by a number of buildings and associated hardstanding for car</p> | <p>The freeholder (the National Trust) stated in their response received on 30 January 2013 that the land should remain within MOL. The planning inspector who presided over the Examination in Public of the 2003 adopted UDP and Policies map, rejected the proposal to</p> |

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| | Centre) | <p>parking and in our view performs no function in terms of the wider MOL. In addition the MOL designation limits and restricts the refurbishment and upgrade of the garden centre site. Removing the area from the MOL designation would not affect the treatment of the designation of the whole Park. It would also afford certainty and security for investment in the garden centre. It should be recognised that the garden centre and the associated businesses within the complex of the centre support the costs of maintaining the Park. It is therefore considered that the garden centre itself should not be within the MOL designation, which reflects its current physical state and its role in supporting the activities of the Park. Moreover the removal of this site from MOL would protect the wider MOL designation of the Park. In addition it is considered that the other designations placed upon the site (such as its Conservation Area, flooding</p> | <p>remove the garden centre land in Morden Hall Park from the MOL designation and wrote the following on <u>page 45</u> of his report:</p> <p><i>“Morden Hall Park forms part of a linear area of open land that runs through the Borough and links up with MOL in Wandsworth and Sutton to the north and south respectively. The garden centre and the associated expanse of hardstanding are contained within a walled area of the Park. There is no outward impression of the built up nature of the area and is does not impinge upon openness or on the integrity of the MOL as a whole. To my mind, the objection site forms an integral part of the historic Park and the MOL designation would ensure a strong level of control that is justified in such a sensitive location. I do not support removal of the objection site from MOL.”</i></p> <p>Neither the site nor planning policy regarding MOL have changed substantially since 2003.</p> |
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| | | and Historic Park and Garden designations) will protect the complex from inappropriate development in the future, ensuring that any proposed development associated with the garden centre would be both sensitive to these designations and the designations on the wider Park. | |
| Policies map – open space or similar issue | Capital Gardens Limited (Morden Hall Garden Centre) | The site is covered in a significant number of buildings and hardstanding for car parking and as such is not open space in the strict understanding of that term. Given the existing development on the site it appears illogical to have the site identified within the open space designation. Its removal from that designation, while logical given the existing development on the site, causes no harm to wider open space designation. | It is not clear but it appears that the car park is not exclusively for the garden centre's customers and therefore it could be viewed as an ancillary facility to the park. The garden centre itself might not be ancillary to the park but it is clearly compatible with the park use and in this instance, where it is an integral part of the historic park, all the land should remain as open space. |
| Policies map – open space or similar issue | Natural England | use of the existing natural signature of the borough can be used to help deliver the Park | The comments were forwarded to the WVRP Development Board for comment. Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures', including a section on the Wandle river valley. We recommended that Natural England refer to this document, the London Landscape Framework can be found at: http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx |
| Policies map – | Wimbledon | Should the long sliver of green | None. Landscaped areas in road reserves are not included as they are not deliverable |

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| open space or similar issue | Society | space between the two carriageways at the western end of Merantun Way, recently given a good stock of trees by the Council, be included? | as open space. |
| Policies map – open space or similar issue | Wimbledon Society | Add on the small triangular space at the northern end of Rookwood Avenue, beside Beverley Brook, as shown on map page 95 next GC07 | This land is now being proposed as open space. |
| Policies map – open space or similar issue | Wimbledon Society | Continuation of the MOL zoning (equivalent to Green Belt) across the Camp Road housing site would allow a tighter restriction to be placed on future extensions, that could otherwise further erode the green-ness of this area. This was included in the UDP MOL (= Green Belt) land zoning. | The land is still MOL but Open Space designation is to be removed because they are a block of residential properties (back gardens not designated elsewhere). |
| Policies map – open space or similar issue | Wimbledon Society | An additional Nature Reserve site could be added, being site 30, the triangle of land beside the rail lands in Home Park Road. | None Too small to be functional nature reserve (funding?). Better to include as private garden space) |
| Policies map – open space or similar issue | Wimbledon Society | The Green Corridors shown are primarily in the public view. Should there not be a companion map which shows the very considerable corridors that exist along private back gardens? These | None Back gardens sufficiently protected from development by means of NPPF, London Plan, CS etc |

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| | | currently perform a major function in providing havens and migrating routes for wild life, yet are prone to loss by back garden development. Identifying them would provide a criterion for assessing whether a back land project could be disruptive to wild life. | |
| Policies map – open space or similar issue | Wimbledon Society | The (eastern) bank of the Beverley Brook should be a SINC. | None Already is SINC |
| Policies map - General | Environment agency | Changes to map already agreed (Part 11-4). Although we do not have any particular concerns, we would advise that the most up to date flood maps be used in the production of this map. | The most up to date flood risk maps will be illustrated on the Policies map at the time of publication. |
| Policies map - General | Wimbledon Society | Flood Zone 1 should be shown also. | No action needed. The council is only required to show/identify zone 3 flood areas. |
| Policies map - General | Wimbledon Society | It would be helpful to have at least some indication of the mapping of the adjoining Boroughs shown. | The policies map was amended to illustrate feint mapping of adjoining boroughs (but not designations within) was shown. |
| Policies map - various | GLA | show All London Green Grid proposals | All the linking projects in the Wandle Valley and Arcadian Thames Areas Frameworks of the London Green Grid (ALGG) are captured in the 'Walking/Cycle Route', 'Proposed Cycle Route' and 'Cycle Network' routes indicated on the Policies Map . All the projects that relate to habitat improvements are in SINC's with management plans and those with regards to river embankment improvement are addressed by Core Strategy policy CS13 (g)(6), which in para 21.12 states: " <i>The biodiversity value of the river Wandle, Beverley Brook and Pyl Brook will be protected and we will work with developers to encourage new linkages in landscape and visual</i> |

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| | | | <p><i>terms into the river corridor where development opportunities arise. The council recognises the waterways as a natural asset and will follow the advice of the EA's Thames River Basin Management Plan and the London Plan."</i></p> <p>There is also a direct reference to the ALGG in paragraph 5.16 of policy DM O1: Open Space. There is therefore no need to show the ALLG proposals on the Policies Map.</p> |
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Table 3: Summary of representations received during Stage 3 regarding draft development policies.

| Policy | Respondent | Comments from respondent | Action |
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| DM R1 | Love Wimbledon and Merton Chamber of Commerce | They support this policy except on subsection C where they suggest a more open approach to the amalgamation of shop units if such action was in the interest of maintaining a sustainable town centre. B) They support paragraph 1.3 of the justification text which sets out the council's intention to direct town centre type uses towards town centres. | Action - updated policy DMR1 part c to include "unless it contributes to the council's regeneration objectives" and support of this policy is noted. |
| DM R1-R5 | Wimbledon Society | a)It is difficult to understand the Council's strategic retail approach. b) the proposed upper limited of 1,000sqm for a unit in Wimbledon Village should not be accepted as it is; far to large and accepting this figure would encourage much larger retailers changing the nature of the village and send the message that amalgamation of smaller units could not be resisted. c) The same applies to Raynes Park and Arthur Road. Delete 'unless it contributes to the council's regeneration' as it gives the impression that you can get around this policy. d) Additional policy to designate a 'cultural quarter' (theatre and Polka) - in which arts type uses would be promoted. c) new policy to set a requirement that the old civic hall as a new performance space. e) a new policy for the council to promote the Wimbledon Way Olympic legacy route. f) the policy should require for new markets to be located in the town centre and not in out of town locations. g) Table 7.1 - to show the 'designation of types of frontages information on map 577 for Wimbledon town centres. | Action - to include maps of designated shopping frontages in next consultation. A) Policy CS7: Centres of the Core Strategy is Merton's overall strategy for retail and town centre type uses in Merton. The Core Strategy forms part of Merton's local plan therefore does not need to be repeated in this document. B) This policy applies to new development. The character of the existing village would not change because as set out in DMR1 we do not support the amalgamation of units in Wimbledon Village. C) Raynes Park and Arthur road already have existing large retail units therefore it is difficult to see the harm that would be caused as a result of this policy. D) As illustrated in the Core Strategy, there is a cultural quarter already existing in Wimbledon town centre. The majority of the area is located in the secondary shopping frontage where we encourage a wide range of uses therefore a new policy is not required. E) The Wimbledon Way pedestrian route is being developed jointly with a partnership between LoveWimbledon and Merton Council. Most of the ambitions for |

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| | | | the project relate to public realm and highways enhancements. Further designation is not considered to be a strategic planning consideration therefore no action is proposed. F) Not all markets are suitable for town centre locations, for example the car boot sale which exists on Wimbledon stadium. The council is therefore providing flexibility for market sites and a range of options for potential new markets, subject to meeting existing licensing requirements. G) The map was updated. |
| DM R2 | Love Wimbledon and Merton Chamber of Commerce | Support paragraph's 1.20 and 1.29 of the justification text which again supports the development of town centre type uses towards designated town centres. | Support noted. No action needed. |
| DM R2 | Gregory Gray Associates - The Garden Centre Group. | Argue that this policy should not be a blanket policy as in their opinion our proposed policies are not catering for certain specialist forms of retailing which could have a serious adverse impact upon the local economy and employment market. They suggest that would should create a new policy for Garden Centres - Policy DMR8. "New garden centre development will be permitted where: 1) it comprises a 'sustainable form of development' with reference to its economic, social and environmental impacts 2) It would not undermine the viability or vitality of nearby town or district shopping centres or local shopping facilities 3) It complies with the design requirements set out elsewhere in this Plan. | All applications will be considered against Merton's local plan on its own merits. Though this proposal will be considered against Policy DMR2, the applicants would need to submit an impact assessment and sequential test and generally explain why the retail unit needs to be at this location, for instance, its a garden centre connected to Morden Hall park. There is no need to create specific policies for each and every type of retail development otherwise our proposed plan will be repetitive and not user friendly. No action needed. |
| DM R4 | Love Wimbledon and Merton Chamber of Commerce | Considers that the marketing period of 12 months is too long and argues that it is not a usual requirement. They are of the opinion that it will benefit the Council as well as landlords if it was scrapped or at the very least reduced to 3 months as we | Comments are contradictory. The market period is based on evidence and is very flexible as we do not require the unit to be vacant before its marketed and we do state in the |

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| | | need to do everything to encourage lettings in the current climate. b) They are in support of paragraph 1.46 which sets out clearly the 12 month period. | marketed criteria that this is the marketing time period unless otherwise agreed with the council. No action needed. |
| DM R5 | Love Wimbledon and Merton Chamber of Commerce | Support paragraph's 1.78 and 1.79 of the justification text which supports the protection of leisure and entertainment uses in Wimbledon town centre. | Support noted. No action needed. |
| DM R5 | NHS South West London | a) Supports policy re hot food takeaways. They consider that by limited the number of hot-food takeaways outlets will help increasing environments where foods lower in saturated fat are more easily available and cheaper than those high in saturated fats. Also, public health also recommend that planning permission for hot food take-away outlets is further restricted in areas within walking distance of schools. b) They support our policy for the protection of leisure facilities. They believe that this policy could be strengthened further by a requirement to demonstrate that there are alternative leisure facilities in the area. | When creating these policies, we completed research that showed that there is no proliferation of hot food takeaways in areas within walking distance of schools. Therefore Merton's evidence would not support such a restrictive policy. B) To protect all leisure facilities, which incorporates a number of different activities, unless there are alternative leisure facilities in the area as a policy would be too onerous. No action needed. |
| DM R5 | NHS public health | Re hot food takeaways supports the policy. They highlight newer documents that we could refer to in the justification text - Health Lives, Healthy people (2011) or NICE Guidance PH42 Obesity: Working with Local Communities 2012 and the Healthier Catering Commitment. | Completed evidence to justify this and have updated policy so that evidence is more up to date. |
| DM R6 | The Theatres Trust | a) Support Policy DMR6, though are concerned with; sui generis. In paragraph 1.71 sui generis is in capital letters and is lower case elsewhere. Paragraphs 1.48 and 4.28 state that sui generis is a Use Class - sui generis, they consider that sui generis is not a use class and for accuracy should not be described as such. | Action – text amended so Sui Generis Use Class was replaced with 'uses identified as sui generis use'. |
| DM H1-H3 | London Gypsy and Traveller unit | The absence of a policy to identify a supply of specific, deliverable traveller sites (justified on pages 45-46 of the DPD) does not conform to the requirement that Local Planning | Core Planning Strategy policy CS10, adopted July 2011 as sound, provides criteria based policy for assessing GandT sites. Approach to |

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| | | Authorities prepare fair and effective strategies. | specific site allocation justified in pages 45-54. No further action needed. |
| DM H1-H3 | London Gypsy and Traveller unit | We are concerned that the evidence base informing the Sites and Policies DPD is not sufficiently robust and does not demonstrate the Council has met the Duty to Cooperate, as required by the NPPF and PPTS. the Research Report on Accommodation Needs (January 2013). This was conducted as part of the October 2011 event, for which we consider that some of the research methods are inconsistent and the final results are an underestimation of the real need for Gypsy and Traveller pitches. It is unclear why the analysis of accommodation need excluded Gypsies and Travellers residing outside the Borough and even Merton residents who did not provide verifiable addresses. Furthermore, since most of the 36 respondents would clearly prefer living on a site, it is difficult to understand why only 6 households have been taken into consideration in drawing up the conclusion that there is a need for 2 private pitches and 4 public pitches in Merton. We would also question the effectiveness of the site waiting list held by the Council, given that none of these families are registered on it. | The Mayor of London considers that boroughs are best place to assess need and identify sites. Boroughs have been in touch both London-wide and across south London and it is clear that boroughs are working to assess need within their boundaries. Census shows approximately 213 people identify themselves as having gypsy and traveller heritage, yet long-term council and MPH waiting list shows no-one wanting to move to site (unlike other nearby councils) and later research of residents on Brickfield Road demonstrates most of these occupiers are seeking bricks and mortar accommodation. This evidence is consistent with the feedback from the October 2011 event. No further action needed. |
| DM H1-H3 | London Gypsy and Traveller unit | In our view, the 2008 London GTANA is a robust evidence base and the need has not decreased since it was conducted. With regards to the emphasis on the needs of housed Gypsies and Travellers, we would point out that many Travellers in London have been forced into bricks and mortar against their will because of lack of adequate site provision and their needs should be included in any assessment of need. We therefore recommend that the maximum level of need identified in the London GTANA (16 additional pitches by 2017) is used as the baseline figure to inform the Site and Policies DPD | The Mayor of London extensively criticised the methodology for the 2008 London GTANA and its results so there is a difference of opinion between the Mayor and the London Gypsy and Traveller Unit. Evidence from Merton does not demonstrate that travellers in Merton have been forced into bricks and mortar against their will; feedback from Brickfield Road residents as well as data from waiting lists and illegal encampments and the Census demonstrates that travellers in Merton seem to be happier in |

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| | | | bricks and mortar housing to meet their needs. No action needed. |
| DM H1-H3 | London Gypsy and Traveller unit | Secondly, the Sites and Policies DPD fails to demonstrate how the Borough has collaborated with neighbouring authorities in assessing need and identifying land for Traveller sites, as required by the Planning Policy for Traveller Sites (paragraphs 6 and 9) and National Planning Policy Framework (paragraphs 178-181). While there is a claim that the Council has worked with South London Boroughs in preparing the needs assessment, the process and outcomes of this engagement are not reflected in the document, which is a consideration in judging the soundness of the DPD. | Merton officers have organised and met housing and planning officers from 6 south London boroughs (surrounding neighbours and other south London boroughs further afield specifically on GandT issues). Merton officers have followed this up with individual meetings and contacts on GandT issues, also with liaison with all London boroughs as part of the Association of London Borough planning officer contacts. The research document can be updated to reflect this. No further action is needed. |
| DM H1-H3 | London Gypsy and Traveller unit | Finally, we do not consider the Council has involved all the relevant stakeholders in the preparation of this document, as required in paragraph 6 of the PPTS. As a community development and regional strategic organisation providing support to Gypsy and Traveller communities in London for more than 20 years, the London Gypsy and Traveller Unit should have been engaged in the production of the Needs Assessment and Sites and Policies DPD. | The council considers it has consulted all relevant stakeholders throughout the preparation of the Sites and Policies Plan process. No action needed. |
| DM H1 | McCarthy and Stone Retirement Lifestyles Limited | Object to DM.H1 (b) requirement for supported care housing (including C2) to provide contributions to affordable housing | Reference to London Plan paragraph 3.51 should be included within the SandP Plan which at present offers a greater flexibility on this issue than the LP. The references made in relation to points (v) and (vi) provides clarity on the types of housing to which policy DMH1 relates to. Paragraph 3.51 of the London Plan states that this plan supports boroughs in seeking application of the principles of affordable housing (Policies 3.10-3.13) to the |

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| | | | <p>range of developments-including those falling within Use Class C2 which cater specifically for older people. The existing phraseology provides flexibility regarding consideration of affordable housing requirements in relation to supported care housing schemes. Supporting paragraph 2.24 of policy DM H1 states that generally proposals for supported care housing will be expected to provide affordable housing in accordance with policy CS8 while Paragraph 2.25 goes on to clarify that the council will seek affordable housing for self contained housing proposed for occupants to buy rent or lease may be considered. In contrast it further advises that care institutions (usually in use class C2/C2A) are unlikely to be considered for affordable housing however each case will be assessed on its individual merits. No action is therefore considered necessary.</p> <p>One issue raised by which we do not have supporting evidence relates to impacts on viability of affordable housing requirements on supported care housing schemes, although we could make the points (a) each scheme on in its individual merits b) there is flexibility in CS8 requirements to take account of viability, economics of provision anyway.</p> |
| DM H1 | NHS | Public Health is satisfied therefore that policy H1 aims to meet the housing needs of vulnerable groups that relate to health and wellbeing. | Thanks for support (no action needed). |
| DM H2 | English Heritage | Policy DM H2 – We welcome the changes made to this policy | Paragraph 2.34 of the policy already states that |

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| | | in that it no longer is absolute in its intention. However it would be still useful to acknowledge that other factors could influence the housing mix of a proposal, such as contextual design issues. | housing mix will be applied " <i>...having regard to relevant factors including individual site circumstances, site location...</i> " etc. It is considered that this adequately covers contextual design issues therefore no action is needed. |
| DM H2 | NHS | Public Health welcomes the statement that development proposals will be assessed against a set indicative housing mix of smaller and larger units to suit different house-hold compositions such as single people, families with children and older people. Public Health recommend that where a developer has made a case for not providing the indicative housing mix, the impact of this non-mixed housing should be carefully monitored. Also, where the opportunity arises, improving the social mix of existing areas should be considered e.g. through mixing tenure types or improvements to facilities and services to encourage a mix of income levels | Thanks for support. Action – the policy will be monitored. |
| DM H2 | Wimbledon Society | Should not the text of this rather vague policy instead be made as clear as is described in paragraph 2.32: in essence, why not say clearly that the mix to aim for currently should be broadly equal between one bed, two bed and three or more bed types. | The bed unit mix set out in paragraph 2.32 is indicative rather than a policy requirement. The mix is set out in Merton's Housing Strategy (2011-2015). The Housing Strategy, which wholly informs the indicative bed unit mix set out in paragraph 2.32 is periodically updated and it is considered that notwithstanding that it is indicative, inclusion within the policy wording would outdate the Sites and Policies Plan given it's 10 year duration. It is therefore considered that no action is needed. |
| DM H3 | GLA | Policy not in conformity with London Plan. Policy should seek to meet full range of housing need and maximise output, whereas DM.H3 as stands would constrain output with 65% cap on market rent. Mayor has agreed strategic London-wide | The policy has been amended in subsequent discussions with the GLA. The GLA has now approved the revised policy. |

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| | | average rent at 65% market rent. For this to work, the business plans of the 63 RPs delivering the programme require the flexibility to operate on a scheme by scheme basis sensitive to local variations in market rents and within each scheme. Not compliant with NPPF, with London Plan policies 3.11 and 3.12. See Inspector's report for Tower Hamlets which demonstrates that by trying to limit rent levels as a matter of policy, boroughs will inhibit <i>overall delivery by adding an undue burden onto the financial viability of many projects, in conflict with national guidance in paragraphs 173 and 174 of the NPPF.</i> | |
| DM H3 | GLA | HCA no longer operates in London and functions have been taken over by the Mayor. | The wording was amended as suggested. |
| DM H4 | Tree Warden Group Merton | The policy should include consideration of the impact on the surrounding environment and resist applications that fill the site as they damage conservation areas, where they are most likely to be built. | This matter has been addressed within the design policies. |
| DM H4 | Wimbledon Society | Requiring new houses to meet Code level 5 at this stage is understood: it has been the intention of HMG that code 6 is to apply in 2016, so future amendments may be needed. | Again there seems to be confusion between building regulations (Part L) and the CSH. CSH covers a significantly larger range of issues than Part L and therefore there is not a simple read across. Building regulations are scheduled to be increased to Zero carbon from regulated emissions from 2016 (demonstrated through carbon compliance and allowable solutions). Part L improvements can be enforced through the use of CSH. The government have no plans to introduce a mandatory level of CSH level 6. No action needed. |
| | Wimbledon Society | Additional policies: (a) Developers may claim that if they build two or more houses, then the policy should not apply, and the policy should therefore take in this situation. | This policy is not designed to cover the intensification of housing on a site, rather ensure that there is an environmental |

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| | | | improvement where dwellings are replaced like for like. No action needed. |
| | Wimbledon Society | Additional policies: (b) Developers may claim that if they build two or more houses, then the policy should not apply, and the policy should therefore take in this situation. | Policy will be applied according to the designation of building regulations approved documents Part L a (new build) and Part Lb (extensions and refurbishments). The policy will be applied where Part La is used. No action needed. |
| | Wimbledon Society | Figure 7.1 The Heat Map: Unclear what the various symbols represent. | Action – map amended to ensure clarity and some symbols were removed. |
| | Wimbledon Society | Wimbledon Town Centre included as a decentralised energy opportunity area | Action - Incorporate GLA DE Map opportunity area on Figure 7.1 |
| | Wimbledon Society | The Council should also commit to publishing the total energy importation figures for the Borough from say 2000 onwards | Not technically possible/viable. No action needed. |
| | Wimbledon Society | Additional policy required - Introducing acoustic screening ; Not only should the plan constrain noise-making developments, it should also repair the mistakes of the past by introducing noise barriers to protect vulnerable areas | Existing policy proposal is sufficient. No action needed. |
| | Wimbledon Society | Additional policy - Noise: should be included that controls the timing of on-site construction activities and limits them to hours that respects the amenity of local residents. | Action – it is considered that the policy enables appropriate provision for noise to be assessed and mitigation measures to be imposed as a planning obligation or condition. Each proposal is considered on its merits with evidence. |
| | Wimbledon Society | Allowable solutions: The Society is not able to comment on this as information on what the scheme entails has not been examined. It is not yet clear whether such a scheme will end up as an excuse for developers to avoid making their projects energy efficient. | Action - add lines to signpost towards the introduction of allowable solutions policy. |
| | Wimbledon Society | Sites identified for potential linkages to a CHP network | DM EP1 covers CHP opportunity areas. No action needed. |
| DM H4 | Tree Warden Group Merton. | The policy should include consideration of the impact on the surrounding environment and resist applications that fill the | These matters are considered within the design policies. |

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| | | site as they damage conservation areas, where they are most likely to be built. | |
| DM H4 | Wimbledon Society | <p>DMH4 Demolition of a dwelling house Requiring new houses to meet Code level 5 at this stage is understood: it has been the intention of HMG that code 6 is to apply in 2016, so future amendments may be needed. Two additional policies should be considered. (a) Developers may claim that if they build two or more houses, then the policy should not apply, and the policy should therefore take in this situation. (b) Also, when (as is often now the case), a small portion of the existing house is retained (perhaps only a small part of the front façade), developers are claiming that, as it is not totally new, the policy should not apply. Again, this should be countered by a new policy.</p> | <p>(a) Policy DM H4 applies to proposals for the demolition and redevelopment of a dwelling where no net gain in units is proposed. Where a net gain is proposed then policy CS15 would apply, therefore no action is needed. (b) each case to be assessed on its individual merits to determine which policies are most applicable, therefore no action is needed.</p> |
| DM H5 | GLA | <p>Mayor welcomes link to existing educational establishments as described in paragraph (a)vii. However the borough should not constrain student housing provision which meets strategic as well as local need and should not be restricted to <i>establishments within Merton or adjoining boroughs</i></p> | <p>Noted. Further text added to justification to further clarify Merton's policy approach. It is considered that the policy strikes a suitable balance between meeting the Mayor's strategic and local objective concerning student housing provision and minimising the compromise on capacity for conventional permanent housing in Merton. Also confining provision of student housing to Merton and the adjoining boroughs ensures that the provision of new student accommodation is located close to their places of study, as inadequate provision would result in students having to travel long distances to attend their place of study contrary to sustainable development principles. Amendments will however be made to replace references to <i>establishments within Merton or</i></p> |

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| | | | <i>adjoining boroughs to: establishments within Merton or neighbouring south London Boroughs of Croydon, Lambeth, Kingston-upon-Thames, Richmond, Sutton and Wandsworth. No further action is needed.</i> |
| DM H5 | GLA | GLA officers think it is unreasonable to ask student housing developments to provide purpose built dedicated floorspace that is managed for cultural or arts studios or activities as in paragraph viii of policy | Merton 3rd level educational establishment is Wimbledon College of Arts. To create sustainable and vibrant communities, it is important that facilities are available that both support the local economy and make the most of WCA. Developments in Lambeth (Stockwell) have successfully delivered student housing plus this approach in conjunction with the developer and ACME as manager. All subject to site location and viability. The policy was amended to state subject to site design and viability. |
| DM H5 | Wimbledon Society | DMH5 Student Housing Policy a(iv) should be placed first, as over-concentration of this type of housing can be detrimental to local character, particularly if the associated lifestyles could create social tensions, or when an exodus during holiday times results in a significant drop in the local population supporting local facilities. | The Sites and Policies Plan is read as a whole with all aspects having equal weighting. The content of the policies has been ordered logically and the sequence in which policies or where appropriate the points within them are ordered does not denote priority. It is considered that no action is needed. |
| DM C1 | English Heritage | Policy DM C1 – It is noted that this policy has not been amended to reflect our previous comments. A way forward could be to include a reference to the historic context of sites in the Justification (e.g. paragraph 3.5). Specific reference could be made for proposals to be developed accordance with design policies such as DM D3 Managing Heritage Assets. (For info, stage 2 comments = "English Heritage requests that Policy DM C2 allows more explicitly for the upgrading of | Yes. DM.C2 paragraph 3.23 added " <i>In relation to historic school buildings, the council will support the upgrading of these buildings to meet modern standards for learning environments in line with Merton's Core Planning Strategy CS.7 Design, policy DM.D3 Managing Heritage Assets and specific English Heritage guidance.</i> " as this is the policy that |

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| | | historic schools to meet modern standards. Guidance on this matter is available on our HELM website referred to above in our comments on the SA"). | relates to development of schools. Reference to EH guidance also added to Delivery and Monitoring section and to Glossary. |
| | Wimbledon Society | Policy (b) should come first; the protection of those facilities that already exist should be paramount. Also, the policy should be re-worded so that it is positive, saying that these facilities should be retained, with any loss being seen as unusual and having to pass stringent criteria. Note the clarity in paragraph 3.4. (a)vi should read “....have an undue ADVERSE impact” | Yes. Add 'adverse' after "undue" in a) vi. The order of the sections within the policy is irrelevant because it does not represent a hierarchy of importance, merely an orderly breakdown of relevant matters. The criteria tests in part b) are sufficient. |
| | Wimbledon Society | It would be helpful to define “Community facilities”, perhaps in the Glossary (see 3.4). | Yes a definition was added to the glossary. References to "nurseries, schools" and "play, recreation and sports facilities" in paragraph 3.86 of the London Plan have been removed because they are respectively dealt with in policies DM C2 and DM O1 (and Core Strategy policy CS 13 part h) This definition for 'Community facilities' added to Glossary: <i>Covers facilities such as health provision, colleges and universities, community, cultural, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.</i> |
| DM C2 | English Heritage | Policy DM C2 – Reference could be made in the Justification to the opportunity of upgrading schools in historic buildings in line with English Heritage guidance Refurbishing Historic School Buildings (http://www.helm.org.uk/guidance-library/refurbishing-historic-school-buildings/). | Yes. DM.C2 paragraph 3.23 added " <i>In relation to historic school buildings, the council will support the upgrading of these buildings to meet modern standards for learning environments in line with Merton's Core</i> |

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| | | | <i>Planning Strategy CS.7 Design, policy DM.D3 Managing Heritage Assets and specific English Heritage guidance."</i> and this sentence added to the Delivery and Monitoring section: <i>"English Heritage provides specific guidance to assist the upgrade of historic school buildings to meet modern standards, such as "Refurbishing Historic school buildings" (2010) and "Practical considerations for the design and implementation of refurbishment projects of historic school buildings" (2011)."</i> |
| Merton's Children Schools and Families Dept | Paragraph 3.14 states that "The projected growth in demand for school places is set out in paragraphs 19.11 - 19.15 of Merton's Core Planning Strategy". While this is a simple reference and it is recognised demographics may change over the lifetime of the document it should be acknowledged somehow that Merton's Core Planning Strategy document was agreed nearly 2 years ago and based on evidence that is approximately 3 years out of date. Since then GLA population forecasts, including those now coming out based on the 2011 census shows an even greater increase in demand. 3 years later, the substantial need for secondary school places, and the land required for this is also much clearer. | | Add sentence to paragraph 3.14. Include the following sentence at the end of paragraph 3.14: "The projected growth in demand for school places is closely monitored and updated annually." |
| Merton's Children Schools and Families Department | Given the substantial need for additional school places - over 4,000 age 11 to 16 secondary school places alone over the next 10 years - it appears that your development plan would not allow the council to deliver its statutory requirement to provide sufficient school places. Only a small number of large sites are identified for development, which means that the council will need to also utilise existing school sites for development to provide | | School playing fields are of public value as open spaces and have been included in the council's MOSS. The criteria for the open space boundary delineation would not be relevant once the Policies Map is adopted and the proposed phrase would be unacceptable as an exemption in Policy DM O1 Open Space. School expansion proposals on open space will have to be justified and assessed on a case by |

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| | | <p>sufficient school places. However, the draft policies maps document has the following inclusions for open space where there is a presumption not to develop "Large soft landscaped open spaces within school grounds (e.g. playing fields) and (hard) demarcated playing pitches (e.g. netball courts), including ancillary school buildings or hard standing (e.g. car parks) not in the immediate vicinity of the main school building". With this very tight definition of open space on school sites we will be left in the position where in the vast majority of cases where the council seeks to meet its statutory requirement to expand a school in keeping with DM C2 it will clash with the open space policy. While, of course, the council would wish to retain open space as much as possible on school sites for school pupils and the community to enjoy, there has to be some acknowledgement of the dilemma and therefore greater flexibility. One means could be to acknowledge this by stating in the above school grounds definition "<i>except where it is required to provide statutory school places to meet an identified shortfall in line with policy DM C2 and there is a plan to provide sufficient sport and play space for the school pupils and general community.</i>"</p> | <p>case basis. The policy will therefore not be amended.</p> |
| | <p>Merton Tree Wardens Group</p> | <p>Where schools are next to public open spaces which are used by the school as play areas or playing fields, particularly if the school has sole use during school hours, the school should pay for their use. When schools received local management status they became the equivalent of private companies and so should fund the use of public facilities. This would be a source of income for Green spaces which has suffered significant budget cuts in recent times.</p> | <p>Add sentence to justification. Agree with principle of legal agreement needed between school and leisure facility, where planning permission is granted on the basis of the school's need for access to that open space, MUGA etc. Under Education Act, schools can become under separate ownership/management from the council; under Localism Act, green space can become under separate management from council. Important to include legal agreement from start</p> |

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| | | | <p>to accommodate this.</p> <p>Add this sentence to Justification text: <i>"Where it is deemed necessary and acceptable for a school to have shared use of a nearby open space, with the school having sole access to an area during school hours, an appropriately worded legal agreement should be put in place to ensure continued access in the event of the ownership or management of the school or open space changes from that of the council."</i></p> |
| | Wimbledon Society | There should be no distinction made between schools that are fully publicly funded and others (b). (Some schools have an element of state funding: new kinds of school are emerging: some pupils in fee-paying schools have state funding support etc). | No action needed. Amended as part of Stage 2 representation. |
| | Wimbledon Society | Add to (d)all the criteria in policy DMC1(a) AND THE COUNCIL'S PLAN FOR EACH AGE GROUP". 3.25 on monitoring, add: "...decisions AND WILL PREPARE A PLAN FOR EACH AGE GROUP SHOWING THE FUTURE PROVISION." This is so that it will be made clear to the public what amount of land is needed for the expanding child population, and the broad areas where these additional sites are to be located. | <p>Add sentence to 'delivery and monitoring' section.</p> <p><i>"Merton Council will also be publishing an annual audit regarding the demand and supply of primary and secondary school places, along with strategies to address the findings."</i></p> <p>The supply and demand of 'basic needs' school places has up to early 2013 been published in publicly accessible council reports e.g. Cabinet reports. From September 2013 the council's Children, Schools and Families department will be publishing an annual report on demand and supply of primary and secondary school places, which will be published annually by 30 September.</p> <p>It is these reports that will be used for the</p> |

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| | | | assessment of the need as referred to in the final phrase of DM C2: "... particularly where new facilities are required to provide additional school places in an area to meet an identified shortfall in supply." The proposed change is not needed because 'need' is effectively addressed in the wording in part a) and the amended justification text, while part d) addresses matters regarding design and access and amenity impacts. |
| DM E1 | Costco | Sui generis uses also appropriate on designated industrial areas | Action – the justification text of this policy was updated regarding not adopting sui generis use as a blanket policy position. The London Plan's Industrial Land and Transport SPG (2012) states that sui generis cannot be applied as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits. |
| DM E1 | Costco | Object to criteria (a) and criteria (d) as does not provide flexibility for other (non-B) appropriate employment generating uses as highlights need for flexibility in NPPF. Criterion (a) should be amended to read " <i>B-uses and closely related uses not falling within a use class sui generis uses (such as cash and carry, builders merchants) but which are commonly found in industrial estates</i> ". Criterion (d) proposed amendment to read "... and storage and distribution (B8 use class) and closely related uses not found within a use class i.e. sui generis uses in the designated industrial..." Supporting text in paragraph | Updated justification text of this policy regarding not adopting sui generis use as a blanket policy position. Policy criteria a) and d) are fine and consistent with adopted development plan and NPPF. The London Plan's Industrial Land and Transport SPG (2012) states that sui generis cannot be applied as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits. Also, the London Plan and SPG gives LSIS the same weighting at SILs though LSIS need local evidence for protection. |

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| DM E1-E3 | Dalton Warner Davies | Policy should take account of PD rights changes. Proposed insertion into policies E1, E2, E3 <i>“For the avoidance of doubt, Policies E1 E2 and E3 are not intended to restrict or remove any permitted development rights where such rights apply.”</i> | Permitted development rights are now in force but are temporary measures. No changes are proposed as the duration of the plan is currently greater than the PD rights. Therefore to consider providing clarity to applicants, update the justification text in these policies to include references to the changes to the permitted development rights. |
| DM E1 | Wimbledon Society | 1) Policy E1 is currently open-ended and no upper limits. The plan should include an indication of targets for growth. 2) Concerns with the PTAL map used in the Core Strategy. 3) Large offices would not be suitable in Wimbledon Village and the references therefore should be changed to 'limited offices in Village, Raynes Park and Arthur Road. 4) bi) to amend to read 'centres and in areas with good and e) amended to as follows appropriate to the site, local distinctiveness and its surroundings. 5) a new policy to have pedestrian-friendly street levels. | To update justification text regarding explanation of PTAL levels. 1) Policy CS12: Economic Development of the Core Strategy is Merton's overall strategy for employment in Merton. We have not included any employment targets for growth due to the continuing economic uncertainty and to make our policies flexible to respond to economic cyclical highs and lows. 2) Need to briefly make clear in justification text that the Core Strategy PTAL is only at a point and time and that we encourage people to use the TFL PTAL calculator to inform planning applications. 3) Wimbledon has a moderate - high PTAL rating and therefore in principal would be suitable for large office development. 4) this is already a policy position in the Core Strategy and forms part of Merton's local plan therefore does not need to be repeated in this document. This is more relevant to design - covered in policy D4. |

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| DM E1-E3, | Dalton Warner Davies | NPPF paragraph 21 says to facilitate flexible working practices by shared employment and residential developments. Requests that E1-E3 amended to state that mixed use always appropriate if site is suitable. | By the examination, we hope to have completed research in Merton on the proportion of mixed use proposals previously that have either succeeded or failed. The purposes of this research are to justify why adopting this policy generally would not be appropriate and why such a proposal should be left to be considered by the council on the individual merits of the proposal and on a site-by-site basis. The council there can assess an application based on its merits without enabling all types of mixed use employment and residential developments. No action is therefore proposed. |
| DM E2 | English Heritage | Policies DM E2, DM D1, and DM D2 – Reflecting our previous comments we would suggest that a reference to the historic context and significance of heritage assets would be useful in these policies, in order to avoid inappropriate developments that could cause harm being supported. | Amendments made to design policies instead (to which all developments would reference). No action needed. |
| DM E2-E3 | Dalton Warner Davies | Marketing should be changed from 2.5 years to 12 months due to flexibility of NPPF and housing need | The market period is based on evidence and is very flexible as we do not require the unit to be vacant before its marketed and we do state in the marketed criteria that this is the marketing time period unless otherwise agreed with the council. No action needed. |
| DM E3 | Costco | Policy should also be amended to say that sui generis uses appropriate on scattered sites | By their nature, scattered employment sites must contain uses appropriate to a residential area. Sui generis uses such as builders merchants, and scrap yards not usually appropriate for residential areas. No action needed. |

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| DM E3 | Astranta Asset Management | <p>The criteria based approach to determining whether existing scattered employment sites should be re-worded to be more flexible. This is because for sites such as Haslemere Industrial Estate where the LB Wandsworth is seeking to enforce a width restriction preventing lorries from accessing the site, existing industrial uses on the Estate are likely to have to move immediately to new premises which will allow larger vehicles to access the units. Clearly if a width restriction is put in place this will further deter the sale or lease of the building and the building is likely to lie vacant for 30 months, in order to satisfy criterion iii. There is no benefit for the local economy is allowing buildings to lie vacant for 2 ½ years and as such, Officers should be able to consider potential changes of use on a site by site basis and be able to take into account factors like road width restricts being put in place, which will further hinder the continued use of an industrial estate for that purpose. Therefore Policy DM E3 a) should be amended to state: a) Proposals that result in the loss of scattered employment sites will be resisted except where some or all of these criteria are met.</p> | <p>Buildings do not have to be vacant to be marketed. Each site is considered on own merits so if there are site-specific material considerations (such as newly restricted access) that should have greater weight than policy criteria for a specific planning application, then these will be considered under the planning application process. No action needed.</p> |
| DM E3 | Robins and Day - PSA Peugeot Citroen | <p>a) They consider that the policy as drafted. Does not provide sufficient flexibility to assess proposals for development on their merits as the policy require all three criteria to be meet. They recommend that this policy should be revised so that one of this criteria only need to be met. b) It is argued that in line with the NPPF the policy wording should make clear that marketing for 2.5 years is the only way in which it can be demonstrated that there is no realistic prospect of employment use. c) They consider that the reference to community use is unnecessary and implies that all employment sites are either suitable or appropriate for community uses and that community uses should be assessed against policies in the</p> | <p>a-b) We have found that ordinarily the reasons why sites are no longer attractive to be occupied by employment uses is for all the reasons detailed in these policies and all of Merton's scattered employment sites would be located in residential areas. This policy is not too onerous and has been applied in Merton since 2003. c) this is a policy that we already adopt in the UDP and makes the policy more flexible. The highest land value is residential use therefore we are providing more opportunities for less valuable uses to be</p> |

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| | | draft Local Plan. | developed before residential use. Once land is adopted for residential use, it never reverts to other uses. No action needed. |
| Employment Generally | Love Wimbledon and Merton Chamber of Commerce | They would like to see robust management of local procurement and local employment as part of planning consent with conditions set out for how this could be followed up and conditions enforced. | For major schemes (over 10 residential units/ 1,000sqm of commercial floorspace), proposed Policy E4: Local Employment Opportunities the council encourages developers to provide opportunities for local residents and business to apply for employment and other opportunities during the construction of developments and in the resultant end-use. No action needed. |
| Employment Generally | South Wimbledon Business Area (SWBA) | a) Highlight the importance of developing employment opportunities within the borough and appropriate skills within the local workforce. b) Employment maintained on the estate if a through bus-route were to be introduced to serve the estate c) Environment would be improved if a centralised business waste collection system for the SWBA and other industrial estates were introduced. | A) Policy DME4 will contribute towards this as well as projects currently being completed in the Economic Regeneration Team. No action needed. |
| DM New policy - back gardens | Wimbledon Society | Additional policy needed to control over-development in the extensive back garden lands of residential properties, that provide so much of our green space. Limiting the amount of building/hard surfacing or garaging into (and under) the rear garden would ensure that a reasonable amount of space for nature would be available. | This matter is adequately addressed in DM D2 'Design considerations in all developments'. The policy will therefore not be amended. |
| | Wimbledon Society | Additional policy also needed to control the amount of front garden space that can be used as hard standing, so as to maintain sufficient green land for street side planting. | This matter is adequately addressed in DM D1 'Urban design and the public realm'. The policy will therefore not be amended. |
| DM O1 | Apostles Residents Association, | There needs to be a paragraph added to make it clear that as the definitions of 'open space' that are being used cover a | It is agreed that Prince George's Playing Fields is not publically accessible for the purposes of |

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| | Plant, J Tree Warden Group Merton | 'broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted', the basis on which open space deficiency for general recreation will continue to be assessed will be based solely on fully publicly accessible open space. reasons for this are that some open spaces such as Prince George's Playing Fields are privately owned and not available to the public for unrestricted general recreation. This particular site is wrongly shown on Figure 21.1 Merton's Open Spaces in the adopted LDF Core Strategy as being 'publicly accessible'. Whilst some members of the public have access to play football (for which they pay) and to car boot sales or fun fairs that the owners arrange (for which they also pay), this is not a site that the public can use for general recreation. There is, for example, no public access point along the northern edge of the site on Bushey Road through which the public can access the site, the owners quite specifically preventing access. | determining Areas of Deficiency to Public Open Spaces. Instead of Figure 21.1, officers use the more up-to-date (May 2012) GIS maps created by Greenspace Information for Greater London (GiGL), which show walking/travel distance (instead of straight line) to the access gates of the various typologies of publically accessible open spaces, to determine the extent of Areas of Deficiency to Public Open Spaces. The suggested additional paragraph is not needed because the definitions of open space used to determine the extent of the designated open space have no bearing on the determination of Areas of Deficiency to Public Open Spaces. The policy will therefore not be amended. |
| | Environment Agency | The proposed policies do not contain any reference to seeking to enhance biodiversity or improving river habitats. Policy <i>DM 01: Open Space</i> seeks to "protect and enhance open space and to improve access to open space". In the justification for the policy (5.2) the value of urban green open spaces for nature is recognised however there is no reference to preserving and enhancing the biodiversity of these open spaces within the policy. | Yes the policy was amended to ensure appropriate wording in DM O2. Eight separate points are made under biodiversity and nature conservation in Core Strategy CS13 "Open space, nature conservation, leisure and culture" (section g). Details of areas to be protected for nature conservation values e.g. Green corridors and SINCS have been moved to policy DM O2 and there is now wording in the policy and justification sections seeking enhancement e.g. policy criteria 'a' and paragraph 5.23. |
| | Environment Agency | The River Wandle and the Beverley Brook are important features of the natural environment of Merton, however there | The Lewisham example is from a Core Strategy, not a lower order document in the |

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| | <p>is no policy seeking to protect and enhance these rivers. The Thames River Basin Management Plan, which includes the River Wandle and Beverley Brook, requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. A policy requiring development adjacent to rivers to restore the rivers, or enhance them to a more natural state, wherever possible, would provide clear, tangible and significant environmental gains in terms of character of the area and nature conservation, as well as contributing to the objectives of the Water Framework Directive. We recommend that the policy be amend to included reference to the enhancement of biodiversity. Please see Lewisham Borough Council's policy for rivers below as an example. <i>Lewisham Core Strategy Policy 11 River and waterways network 1. The Council will work closely with the Environment Agency, English Heritage and a range of community organisations to ensure the River Thames, Deptford Creek and the Ravensbourne River Network are preserved and enhanced and contribute to the Blue Ribbon Network principles. This includes their water quality, landscape, biodiversity, amenity and historical value and wider recreational and health benefits as well as their potential as a transport route. 2. Development adjacent to rivers and the waterway network should contribute to their special character by improving the urban design quality and natural ability of the rivers and waterways to function, the vitality of the river frontages, and improving access to the foreshore and naturalising flood defences, where appropriate. 3. The Ravensbourne River Corridor Improvement Plan, in conjunction with the London Plan policies relevant to climate change and water, will be used to guide works and development along this waterway.</i></p> | <p>Local Plan such as the Sites and Policies Plan. There is reference in CS13 (g) to “improve public access to and enhance our waterways, including the river Wandle and its banks, for leisure and recreational use while protecting its biodiversity value”. Justification states (P.21.12) The biodiversity value of the river Wandle, Beverley Brook and Pyl Brook will be protected and we will work with developers to encourage new linkages in landscape and visual terms into the river corridor where development opportunities arise. The council recognises the waterways as a natural asset and will follow the advice of the EA’s Thames River Basin Management Plan and the London Plan. The policy will therefore be retained in its current form.</p> |
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| | LoveWimbledon | Page 78 – 5.14 – whilst undesignated open spaces are seen as not relevant to this policy, we would support more proactive use of these spaces in terms of sustainability e.g. community food growing as part of a plan for local food security (rather than these spaces being seen as insignificant and perhaps only useful for recreation and leisure). | Agreed - the council is facilitating community food growing activities on a variety of open spaces, including the council's own assets, Merton Priory Homes and other spaces. Core Strategy Policy CS 13-f encourages "the use of land for growing food." Because of the Core Strategy policy no change was considered necessary. |
| | Merton Chamber of Commerce | Page 76 – 5.1 – support mention of open space assisting with biodiversity, surface water run-off and flood risk but would welcome additional plans for green infrastructure with respect to this e.g. green roofs. | There are sufficient policy measures to ensure the delivery of green infrastructure, such as London Plan Policy 5.11, Merton's Core Strategy Policy CS 13 and DM D1 and D2. Therefore no amendment is needed. |
| | Merton Chamber of Commerce | Page 78 – 5.14 – whilst undesignated open spaces are seen as not relevant to this policy, we would support more proactive use of these spaces in terms of sustainability e.g. community food growing as part of a plan for local food security (rather than these spaces being seen as insignificant and perhaps only useful for recreation and leisure). | Agreed - council is facilitating community food growing activities on a variety of open spaces, including the council's own assets, Merton Priory Homes and other spaces. Core Strategy Policy CS 13-f encourages "the use of land for growing food." No amendment to the policy is needed. |
| | Merton Tree Wardens Group | SA/ SEA implications 5.1 Add.and can accommodate trees that alleviate flooding and mitigate climate change. Justification 5.2 Add. Ditto above | Yes – add the text 'and the trees on them' after "Open spaces" in the last sentence of paragraph 5.1. The policy's contribution to climate change is already referred to in the first sentence of the paragraph. In the interest of conciseness, only the last sentence will be amended as follows: Open spaces and the trees on them can also assist surface water runoff and help to mitigate flood risk to properties and people. The changes to paragraph 5.2 are not deemed necessary |

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| | | | because the contribution that trees make to the flood mitigation a climate change are referred to in paragraphs 5.22 and 5.23 of policy DM O2. |
| Natural England | Natural England broadly supports this policy, but would like to see reference to creation of 'new open/green space' where appropriate, currently policy is passive. | | This is already referenced in DM.O1(d) therefore no amendment is needed. |
| Natural England | The Council should also give consideration to the potential for fragmentation and increasing deficiency of access, which could be offset by new open/green space as well as green chains/links or corridors (which is referenced under paragraphs 5.17 to 5.19), where appropriate. | | The wording in DM.O1(d) in combination with the new wording of policy DM O2 is sufficient to address the concerns raised, particularly when read in combination with Core Strategy Policy CS 13 parts a, b and c, therefore no amendment is needed. |
| Natural England | Natural England is pleased to see the references under paragraph 5.2, to the multiple roles Biodiversity and the natural environment can provide | | Noted with thanks. |
| Natural England | Paragraph 5.3 is welcomed in respect of the potential for Habitats Regulation Assessment and Appropriate Assessment, in respect of scheme and or policy documents that may impact upon Wimbledon Common. | | Noted with thanks. |
| Natural England | Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This could be brought out more fully in the Site and Policies DPD and help the borough's green infrastructure to deliver multiple functions, benefitting and contributing to a number of policies. | | There are sufficient policy drivers and assessment routes in the core strategy to promote the improvement and protection of the natural environment. The council has implement targets for sustainable design and construction that could be justified within the borough. These sustainability standards include credits that relate to the delivery of quantifiable biodiversity |

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| | | | actions. This gives the council the ability to negotiate on land, ecology and biodiversity issues with developers within a nationally recognised and accepted framework and according to a quantifiable methodology. These quantifiable approaches provides council officers with the tools to measure developers contributions core strategy policies relating to the protection and enhancement of the naturel environment. |
| Tree Warden Group Merton. | SA/ SEA implications 5.1 Add.and can accommodate trees that alleviate flooding and mitigate climate change. 5.2 Justification Add. Ditto above. | | Action – the justification text was amended accordingly. |
| Wimbledon Society | DM01b and c: Open Space: Start with the clear policy that there is to be no building in open space unless for the purpose of enhancing its use e.g. pavilion: and in iii: only for OUTDOOR sports and recreation. Open spaces must not be used a cheap building sites for non-open space uses, or to raise finance for open space maintenance. | | Yes – the following text was added ‘, <i>which have passed one of the tests in part b) above,</i> ’ after "open spaces" in the first line of paragraph c. The wording in part b is from the NPPF and there is no local evidence to justify a departure. Part c will only be relevant to development that has passed a part b criteria test. The proposed amendment clarifies this and the presumption against inappropriate development contained in part b (" <i>existing open space should not be built on</i> ") is therefore relevant to the criteria in part c). The policy will therefore not be amended. |
| Wimbledon Society | DM01e: the visual amenities AND DAYLIGHTING of the MOL... too many developments come too close to the site boundaries of open spaces. | | A daylight assessment on open space would be unreasonable and hard to assess objectively. The reference to "visual amenities" is deemed to be sufficient therefore the policy was not amended. |
| Wimbledon Society | Paragraph 5.9: Make clear that any subsidiary uses must be minor and subordinate to the prime reason for having a | | It would be unreasonable to insist that uses that meet all other policy tests and meet |

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| | | building (e.g. changing facilities) in the open space: otherwise there will be pressure to build to “generate income” for the Council’s open spaces budget. | condition b) i or ii (which officers think might only be on very rare occasions in Merton), need to be ancillary in nature and scale. Any proposals that meet condition b)iii have to re-provide sports and recreation facilities and as the policy has a strong presumption against development on open space (“...existing designated open spaces should not be build on...”), any other uses would need to be ancillary in nature and scale. The policy was therefore not amended. |
| DM O2 | Natural England | Natural England is supportive of sustainable transport options and encourages the links between this Policy and those of provision of green chains/links/corridors (Policies DM 01 and DM 02), together with increasing access to open/green spaces and nature where possible and appropriate (paragraph 9.4 | Noted with thanks. No action needed. |
| | Natural England | This policy is broadly supported and can be linked to the Council’s aspirations to improve green infrastructure and provision off green links, chains and corridors. This also has the potential to link in with the All London Green Grid | Noted with thanks. No action needed. |
| | Tree Warden Group Merton | DM.O2 Policy b)Add iv. within a conservation area and has amenity value only to neighbouring residents (to avoid the wholesale clearance of gardens in conservation areas which is occurring increasingly frequently) | Yes - amend policy criteria b to improve clarity - see comments. Change wording to: <i>"Development will only be permitted if it will not damage or destroy any tree which:</i> <i>i. is protected by a tree preservation order;</i> <i>ii. is within a conservation area; or,</i> <i>iii. has significant amenity value."</i> |
| | Tree Warden Group Merton | BS 5837:2005 has been revised and updated and is now BS 5837:2012 Trees in relation to design, demolition and construction. | Yes - change the reference number as suggested. |
| | Tree Warden Group | Clause 5.27 needs clarification. Does this mean that the | The planning policy team usually writes the |

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| | Merton | arboriculture officers will deliver and monitor or someone unnamed? | report, using data (on trees) from the council's arboriculture officers and occasionally other sources. No action is needed. |
| DM D1 | English Heritage | Policies DM E2, DM D1, and DM D2 – Reflecting our previous comments we would suggest that a reference to the historic context and significance of heritage assets would be useful in these policies, in order to avoid inappropriate developments that could cause harm being supported. | Policy DM.D1(a) was amended to read - "Relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area". |
| | LoveWimbledon (Merton Chamber of Commerce Make identical representation) | Page 82 – avii) with regard to external lighting, we support the concerns regarding light pollution would also welcome a policy to use energy-efficient lighting; | Action – policy amended to refer to energy efficient lighting (although this would already be required through achieving the necessary sustainable design standards). |
| | LoveWimbledon (Merton Chamber of Commerce Make identical representation) | axi) - we support the promotion of sustainable management of construction site waste. | Thanks for support (no action needed). |
| | LoveWimbledon (Merton Chamber of Commerce Make identical representation) | Page 82 – 6.1 – we would welcome some mention of the use of energy-efficient technologies in design policies, including in heritage buildings where appropriate. | Action - reference to Core Strategy policy CS15 (Climate Change) which sets out sustainable design requirements was included at justification paragraph 6.9. |
| | LoveWimbledon (Merton Chamber of Commerce Make identical representation) | Page 83 – 6.9 – we welcome new developments needing to demonstrate effective use of materials, water and other resources. | Thanks for support (no action needed). |
| DM D1 | Natural England | Natural England broadly supports this policy, especially in respect of the natural environment, biodiversity and natural habitats. The provision of green infrastructure and biodiversity enhancements in development applications is to be welcomed and encouraged, and has the potential to link into and strengthen other council policies. | Thanks for support (no action needed). |

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| DM D1 | Waring, N | Change “amenities” to “amenity”. | Action – the text was amended. |
| DM D1 and DM D2 | Waring, N | Requested clarification of the measure of <i>surrounding area</i> | Further guidance is contained in a number of the design guidance documents referenced at paragraph 6.13. Further guidance to be considered in the proposed Design SPD. No action needed. |
| DM D1 and DM D2 | Waring, N | Requested clarification of measure of <i>wider setting</i> | Further guidance to be considered in the proposed Design SPD. No action needed. |
| DM D1 | Waring, N | Requested clarification of measure of <i>safe layout</i> | Further guidance to be considered in the proposed Design SPD and contained in a number of relevant existing design guidance e.g. Secure by Design Guidance. No action needed. |
| DM D1 | Waring, N | Requested clarification of measure of <i>appropriate minimum standards</i> | The appropriate standards are detailed in paragraph 6.4. The Council will also have regard, as appropriate, to the standards set out in the London Plan and accompanying Supplementary Guidance e.g. London Housing Design Guide. No action is considered necessary. |
| DM D1 | Waring, N | needs to distinguish between “privacy” and “visual intrusion”. What is the difference? | Noted. This will be addressed further in the Design SPD. |
| DM D1 | Waring, N | light pollution is an environmental health matter, not development therefore beyond development control? | Light pollution is considered part of development control and policy exists accordingly. |
| DM D1 | Waring, N | “..any new development...”? ;Will you really ensure that landscaping forms an integral part of eg a roof extension proposal? | Action – the policy was amended to insert the wording “where appropriate”. |
| DM D1 | Waring, N | Use of the word “New” here is unnecessary. All development proposals by their nature are “new”. | Action – the word “new” was deleted as suggested. |
| DM D1 | Waring, N | Will you really require a roof extension proposal to take account of these requirements, by | Action – the word “any” was deleted as suggested. |

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| | | providing well designed public areas and routes and facilitating the natural surveillance of the public realm from adjacent buildings? | |
| DM D1 | Waring, N | light pollution is not a planning issue? When it is not possible to control by conditions unacceptable levels of illumination, on what grounds Will LB Merton refuse planning permission? | Action – the text “where this is not possible” was deleted as suggested. |
| DM D1 | Waring, N | Omit “new”; insert “all”. | Action – the word “new” was deleted as suggested. |
| DM D1 | Waring, N | Omit “new” | Action – the word “new” was deleted as suggested and add “their development proposals”. |
| DM D1 | Waring, N | Queried whether a DAS would be required for roof extensions | Action – CABE guidance advises that DAS are required for most planning applications, except house extensions. Therefore the word “all” was replaced with “planning”. |
| DM D1 | Wimbledon Society | Site Coverage: There is a strong case for limiting site coverage (including basements) so that there is an amount of green and natural garden land available for rain absorption, the growing of plants and trees etc. Not only will nature benefit, but having space around houses, particularly family dwellings, is known to be important for general well-being. | Action - requirements addressing basement developments to be added to DM D1. This will include the expectation that basement developments must not exceed 50% of the garden. |
| DM D1 | Wimbledon Society | Basements: There is a lack of clarity on the planning powers to control these; there are effects on underground water and on nearby property and trees; loss of both nature and absorption of rain run-off; structural consequences for older buildings; significant traffic implications when so much excavated material is taken off site; a split of responsibility with Building Control. | Action - guidance on basement developments to be added to policy DM D1. |
| DM D1 | Wimbledon Society | DMD1a ii: Additional policy (ii) is needed to emphasise that the Council | The term “appropriate architectural forms...” provides an appropriate level of detail and is |

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| | | encourages innovative architectural design rather than “keeping in keeping”. Suggested wording: (ii) “PROVIDE A HIGH QUALITY INNOVATIVE AND CONTEMPORARY DESIGN, SENSITIVE TO LOCAL DISTINCTIVENESS”; | consistent with the NPPF which states that “planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.” Further guidance is provided in justification paragraph 6.16 and it is proposed that additional wording as follows will be included: “The council will promote or reinforce local distinctiveness and encourage high quality innovative, contemporary and sustainable design.” |
| | Wimbledon Society | DM D1 a (v) needs to be placed third: neighbour protection is currently very poorly understood, so: “...sunlight and daylight AND PRIVACY, quality of amenity space, to both proposed and adjoining GARDEN LAND AND buildings ” Essential that the rear gardens do not have their privacy or daylighting adversely affected by aggressive new development: it is not just about protecting “buildings and their windows”. | The Sites and Policies Plan is read as a whole with all aspects having equal weighting. The content of the policies has been ordered logically and the sequence in which policies or where appropriate the points within them are ordered does not denote priority. It is acknowledged that point (v) should refer to adjoining buildings and gardens and this was amended accordingly. |
| | Wimbledon Society | DM D1 a viii needs to be fourth: add in more precision, such as maintaining a proportion of unbuilt open green land on a site (varying in different locations across the Borough), as without this open-ness, we lose nature corridors, wild life, rain percolation and control of run-off, as well as enough space for tree planting: | Disagree to suggested additional precision. A number of policies adequately address this issue including DM 01 (open space), DMO2 (trees, hedges and landscape features), DM F1 (support for flood risk management) and DM F2 (SuDS and wastewater and water infrastructure) and the proposed additional requirements concerning basement developments to DM D1 which will include a restriction on the proportion of any garden that |

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| | | | a basement can extend into. It is therefore considered that no action is needed. |
| | Wimbledon Society | DMD1a iv: "...compatible with the LOCAL DISTINCTIVENESS AND character of" This is a recurring theme in national, regional and local guidance. Add a reference to "URBAN DESIGN" being paramount. | It is considered that this is appropriately covered in justification paragraph 6.16, however additional text was added to the policy as follows will be included: The council will promote or reinforce local distinctiveness and encourage high quality innovative, contemporary and sustainable design. Policy DM D4 addresses urban design matters. |
| DM D2 | English Heritage | Policies DM E2, DM D1, and DM D2 – Reflecting our previous comments we would suggest that a reference to the historic context and significance of heritage assets would be useful in these policies, in order to avoid inappropriate developments that could cause harm being supported. | It is considered that criterion (ii) and criterion (v) in Policy DM.D2 already reference context of building and wider setting (whether historic or otherwise) therefore no action is needed. |
| | Tree Warden Group Merton | To respect the living conditions of existing residents, the number of planning approvals for basement constructions should be a limited, particularly in conservation areas where they are most likely to occur. Needs action on basements to address concerns about local amenity. | Action - inclusion of requirements concerning basement developments to policy DM D1 (design considerations in all developments). |
| | Wimbledon Society | Suggested inclusion of a basement policy | Action – a basement policy has now been included as part of DM D2. |
| | Wimbledon Society | Page 2 There is a strong case for limiting site coverage (including basements) so that there is an amount of green and natural garden land available for rain absorption, the growing of plants and trees etc | The policy was worded to ensure such matters are taken into account as part of any basement development. |
| DM D2 | Waring, N | For "amenities", do you mean "amenity"? Amenities =e.g. public toilets | Action – the word "amenities" was replaced with "amenity" as suggested. |
| DM D2 | Waring, N | Requested a definition of the word <i>original</i> . | The original building is generally defined as a building as it existed on 1 July 1948 (if it was built before that date) or as it was built when built after 1 July 1948. The original building will |

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| | | | therefore not include any extension to a building that has been built at any time since 1 July 1948. The original building does not, however, include any new building that has been built at any time without the need for planning permission as a result of the legislation introduced on 6 April 2010. The definition of original is a legal matter largely informed by planning case law and on an individual case by case basis. Therefore it is not considered appropriate to include a definition in this instance. |
| DM D2 | Waring, N | View that policy preserves the status quo, and that the merits of the original building should be assessed to identify what it has to offer | The policy provides specific guidance on proposals for extensions and alterations to existing buildings. The view that the policy preserves status quo is not supported. The policy does not restrict innovation, originality or initiative therefore is considered appropriate and does not need to be amended. No action needed. |
| DM D2 | Waring, N | Not a planning issue = environmental health. | Disagree. Planning, Environmental Health and Building Regulations all have a role to play in addressing matters raised at point (vi). One of the 12 core planning principles in the NPPF states that planning should "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings." The NPPF (paragraph 123) requires that "planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new |

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| | | | development.” The existing wording is therefore considered appropriate and no action is needed. |
| DM D2 | Waring, N | Do you mean existing building or original building? | Action – the word “existing” was replaced with “original” as suggested. |
| DM D2 | Waring, N | Does not support the SA/ SEA assessments implications of DM D2 | Action – the text “ensures that” was replaced with “encourages” and the word “any” was replaced with “appropriate” as suggested. |
| DM D2 | Waring, N | Is this the NPPF wording – “respect, reinforce and enhance” the local character.....” Why not stick with conservation mantra“preserve” or “enhance”? | Merton’s Core Planning Strategy (2011) pre-dates the NPPF. Wording in emerging Sites and Policies Plan is consistent with the NPPF. |
| DM D2 | Waring, N | Omit <i>new</i> | Action – the word “new” was deleted as suggested and the word “all” was replaced with “planning”. |
| DM D2 | Waring, N | As propos of “respect”, “complement”, “sympathetic” as in CPSP CS14. - By “respect” do you mean “copy”? - Or perhaps “Agree”? - Or “Learn from”? - Or “discuss with”? - Or “Take reference from” Are all of these equally and separately valid? To what extent are they so? How is this measured? I think ideally the local plan must be clearer on this. Is it to rely on simply the opinion of a design officer or Inspector? | Further guidance will be provided in Design SPD. This is considered too detailed and would not accord with the NPPF. |
| DM D2 | Wimbledon Society | DMD2ai should be along the lines of : “....RESPECT THE DAYLIGHTING, SUNLIGHTING AND PRIVACY OF THE NEIGHBOURING LAND AND BUILDINGS...” which means daylighting angles to all site boundaries, as well as to windows; and privacy distances between new windows (at different storey heights) and other people’s private garden | The policies in the development plan are read as a whole and the suggested addition is already addressed at point (v) of DM D1, therefore no action is considered necessary. |

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| | | land as well as their windows: | |
| DM D2 | Wimbledon Society | DMD2aii should be along the lines of: “.....Respect the form of the street and its gaps between buildings”: and one could include maintaining the roof slope/ridge, resisting front dormers unless this is the street character etc: | The suggestion is covered by point (iv) of DM D2 and also points (i) and (ii) of DM D1. Points (vii) and (viii) address the issue of roof developments. Further detail will be appropriately contained in the proposed Design SPD, therefore no action is considered necessary. |
| DM D2 | Wimbledon Society | DMD2a viii: insert the need for rear dormers etc to be set back from the roof eaves and not to allow intrusion of the privacy of the neighbouring gardens and properties: Add policy: “.....NO BALCONIES SHOULD ALLOW VIEWS INTO NEIGHBOURING PRIVATE LAND THAT ADVERSELY AFFECTS PRIVACY: NOTING THAT THE EXISTENCE OF TREES ETC SHOULD NOT BE USED TO JUSTIFY A BALCONY (ALL VEGETATION IS BY ITS NATURE IMPERMANENT AND CANNOT BE RELIED ON TO ACHIEVE PRIVACY)....” | The NPPF (paragraph 59) requires that design policies should avoid unnecessary prescription or detail. These are detailed suggested additions that will be more appropriately considered in the proposed Design SPD. No action is therefore needed as this is most appropriately considered outside the ambit of the Sites and Policies Plan. |
| DM D3 | Waring, N | Is “protect” new Govt wording? Why not stick with “preserve”? | Action – the word “protect” was replaced with “conserve” as suggested and to be consistent with the NPPF. |
| DM D3 | Waring, N | PPS 5 not legally binding and replaced by NPPF? | Action - PPS5 was superseded by the NPPF therefore the reference to it was deleted. |
| DM D3 | Waring, N | “conserves”? do you mean “preserves”? | The proposed wording is consistent with the NPPF therefore no action is needed. |
| DM D3 | Waring, N | will only be granted in exceptional circumstances...Why not say...will normally be refused. Leave the justification to the applicant eg NPPF or the following... | The wording as drafted is positively worded in comparison to that suggested. Positively worded policies are consistent with NPPF requirements. No action is considered necessary. |
| DM D3 | Waring, N | “.....it’s conservation.....”? Change to “.....its preservation.....” | The proposed wording is consistent with the NPPF therefore no action is needed. |

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| DM D3 | Waring, N | “conserves”? do you mean “preserves”? | The proposed wording is consistent with the NPPF therefore no action is needed. |
| DM D3 | Waring, N | Omit “style” | Action – the word “style” was deleted as suggested. |
| DM D3 | Waring, N | Omit “new” from “new development”. All development is new. | Action – the word “new” was deleted as suggested. |
| DM D3 | Waring, N | Replace “.....proposals conserve, enhance or restore heritage assets.....” With “.....proposals preserve, enhance or restore heritage assets.....” | The proposed wording is consistent with the NPPF therefore no action is needed. |
| DM D3 | Waring, N | Replace “All development proposals... with “All development.....” . PPS5 replaced by NPPF. | Action – the word “proposals” was deleted as suggested. The word “former” was added before PPS5. |
| DM D3 | Waring, N | Can you elaborate on the process whereby the council’s Design Review Panel and the Design Champion will advise on development proposals. | Action – the text “the design merits” was added before proposals. The following text was added after “Chaired by the Design Champion, the Design Review Panel consists of experts in the field of the built environment. Comments of the Panel are reported to the Planning Applications Committee and the weighting given to the Panel’s comments is a matter for Committee to decide.” |
| DM D3 | Wimbledon Society | The suggested approach is not considered satisfactory and it is suggested that the policy is minimal and <i>heritage or heritage buildings</i> need to be defined in the glossary. Suggestions provided detailing a re-ordering of the policy content | Noted. No action needed. The approach to managing heritage assets set out in the NPPF is broad ranging and inclusive. The policy drafting mirrors the NPPF approach. Paragraph 6.23 sets out a definition of heritage assets. Paragraph 6.22 provides examples of heritage assets to which policy DM D3 applies and is broadly consistent with that contained in other relevant references e.g. The companion guide to the former PPS5: Planning for the Historic |

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| | | | Environment states “The elements of the historic environment that are worthy of consideration in planning matters are called ‘heritage assets’. This term embraces all manner of features, including: buildings, parks and gardens, standing, buried and submerged remains, areas, sites and landscapes, whether designated or not and whether or not capable of designation.” |
| DM D3 | Wimbledon Society | suggest that <i>the historic building will be preserved</i> ” should be the clear policy message with the exceptions treated as unusual and unlikely | The point raised is appropriately addressed at DM D3 (b). Section (c) refers specifically to those proposals which lead to substantial harm as referred to in the NPPF. |
| DM D4 | Natural England | Policy DM D4: Urban Design and the Public Realm Natural England welcomes the inclusion of sub clause (h) referring to opportunities for enhancing biodiversity in all amenity spaces – “soft landscaping” and this can be extended to new development proposals in general, where appropriate. | Action – the text was amended in accordance with the suggestion to for all development proposals where appropriate to strengthen the policy. |
| DM D4 | Tree Warden Group Merton | DM D4 Urban design and the public realm 6.45 The Design SPG should include protection of the visual amenity of neighbouring properties and prevent the wholesale clearance of back gardens | Action – the former is already included. The latter is not within the scope of the Sites and Policies Plan. |
| DM D4 | Waring, N | Various comments raised suggesting minor layout / presentational changes to policy content. | No changes were except deletion of bracketed words at the ends of points (a), (b) and (c). No further action is needed. |
| DM D4 | Waring, N | Gated development is an applicant/client choice which represents response to customer security concerns. They restrict public access precisely for this reason. | No further actions/revisions are proposed therefore no action is needed. |
| DM D4 | Wimbledon Society | There is still confusion between urban design and the vague term “design”, which is unhelpful. Urban design concentrates on the scale, height, massing, relationship to other properties, building line and so on: it is not at all to do with “architectural | Urban design relates to the macro level e.g. consideration of buildings and how they relate together, the spaces between them and the creation of whole environments. In contrast |

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| | | <p>style”.</p> <p>It needs to be said that the (urban) design of the town is the responsibility of the Council (no-one else can do it), and it cannot be left to developers.</p> <p>They do not have the remit to design the town: they should design the individual development within the urban design constraints set by the Council. Not the other way round.</p> | <p>policy DM D1 (design considerations in all developments) addresses the more detailed design or planning standard considerations of individual development proposals. To improve clarity and understanding of the design policies it is proposed that that they will be re-ordered with DM D4 to be the first design policy (and renumbered to DM D1) and DM D1 (design considerations in all developments) re-ordered to be the second design policy (and renumbered to DM D2). The Sites and Policies Plan is read as a whole and the order in which the policies are presented in the plan does not represent a priority order. All policies in the Sites and Policies Plan have equal weighting.</p> |
| DM D4 | Wimbledon Society | <p>An extensive list of suggested additional considerations concerning public realm matters are suggested.</p> | <p>These are very detailed suggested considerations that will be more appropriately considered in the proposed Design SPD. The NPPF (paragraph 59) requires that design policies should avoid unnecessary prescription or detail therefore the policy accords to this and not placing unnecessary prescription or detail into the policy. No action needed.</p> |
| DM D5 | British sign graphics | <p>Last sentence of paragraph 6.5, the 2007 Regs only permit the use of discontinuance powers where an advertisement is causing "substantial injury" to amenity. Recommend deleting "adversely affected" and replace with "substantial injury"</p> | <p>Action – the amendment was made as suggested.</p> |
| DMD5 | Wimbledon Society | <p>Suggestions concerning policy structuring and inclusion of specific elements concerning signage, advertisements, flags and lighting. Also suggestion concerning the inclusion of two additional policies, one aimed at minimising adverse impacts on residential amenity and the other setting out the approach</p> | <p>It is considered that the form and level of detail set out in DMD5 is appropriate and proportionate and conforms with the NPPF requirement that requires that design policies should avoid unnecessary prescription or</p> |

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| | | that advertisers should adopt. | detail. The suggestions are very detailed considerations that will be more appropriately considered in preparing the proposed Design SPD therefore no action is needed. |
| DM D6 | Wimbledon Society | Suggestions concerning policy structuring and inclusion of specific elements concerning broadband, dishes, transmission poles and aerials | It is considered that the form and level of detail set out in DM D6 is appropriate and proportionate and conforms with the NPPF requirement that requires that design policies should avoid unnecessary prescription or detail. The suggestions are very detailed considerations that will be more appropriately considered in preparing the proposed Design SPD therefore no action is needed. |
| DM D7 | Wimbledon Society | DMD7 Shopfront design AND SIGNAGE (which better describes shop fascias) 12 It would be preferable if the policies were phrased more positively: eg in (ai) RETAIN OR RESTORE quality shopfronts where..... and (aiv) MAINTAIN separate access..... and (av) RESTORE separate access.....have been removed WHERE PRACTICAL. On (b), link up to DMD5: and identify areas where signage could be internally illuminated, or could only be externally illuminated, or kept unlit. Should there not be a requirement that all signage should (if in another language or format) have an English version included; and should incorporate a street number. | Action - revision of title to “shopfront design and signage” is supported to improve clarity. Changes suggested at (a) are supported and amended accordingly. Regarding (b) a cross reference to policy DM D5 is appropriately located in justificatory paragraph. 6.68. The suggested additional requirement is considered too prescriptive for inclusion into to the policy and will be more appropriately considered in preparing the proposed Design SPD. Therefore no further action was required. |
| Environmental Protection - general comment. | Wimbledon Society | The admirable initiative of the Merton Rule is not being followed up sufficiently, with major new high cost housing for example being “designed” to only the current minimum Code levels. | LBM's Core strategy introduced a mandatory requirement for achieving CSH4. This ensures that that there is a 25% improvement over building regulations part L. This represents the highest possible level of sustainable design and construction that could be supported by the |

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| | | | viability evidence available. There seems to be some level of confusion around the sustainability requirement required under building regulations (Part L) and the CSH, which remains a voluntary standard in the majority of developments unless CSH targets are enshrined in local policy (as is true for LBM). No action needed. |
| DM EP1 | LoveWimbledon and Merton Chamber of Commerce | We support the development of new decentralised energy networks but are keen that other renewable energy solutions are not overlooked as viable alternatives, where appropriate eg making provision for solar energy, which is not currently mentioned at all | Yes. Action - policy referencing will be added to improve the cross-referencing. |
| | Workspace Group | Opportunities for decentralised energy networks. Will decentralised energy be supported outside of identified opportunity areas (Colliers Wood, Morden and Mitcham) | Yes decentralised energy will be encouraged through the use of the lord mayor's energy reduction hierarchy and all planning applications will be expected to consider the potential for reducing emissions through the use of CHP. The decentralised energy opportunity areas have been identified in order highlight the areas with the greatest potential for establishing decentralised energy and developments within these areas will be expected to demonstrate compliance with Core Strategy Policy CS15d and demonstrate how they contribute to any existing or planned decentralised energy network. No changes are therefore required to the Sites and Policies Plan. |
| DM EP2 | Wimbledon society | Not only should the plan constrain noise-making developments, it should also repair the mistakes of the past by introducing noise barriers to protect vulnerable areas. For | It is not possible to mitigate against existing development via policy. However, any new development in sensitive areas or |

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| | | example, the noise map 7.2 needs to be updated to include the whole length of the A3, as it does not properly recognise that the elevated section beside BandQ is close to residential areas; and where it passes beside the playing fields at the bottom of the Common it causes a considerable amount of disturbing noise over wide areas. | developments that generate noise would need to carry out a NIA and mitigate against noise as part of the planning app. The NIA recognises the surrounding area (type of use) as part of the assessment (no need to show residential areas) developer is encourage consider all of the surrounding area. The noise map (we are not required to have this in DPD) shows the A3 road that is within Merton (this is all that is all that is require by the plan). If a developer needs to see outside the borough they can refer to the Mayors Noise Action Plan map. |
| DM EP3 | LoveWimbledon and Merton Chamber of Commerce | Page105-106 – 7.18 and 7.25 – we support the establishment of a Merton Community Energy Fund | Thanks for support. No action needed. |
| DM EP3 | LoveWimbledon and Merton Chamber of Commerce | Page 105 – 7.21 – we would like to see mention of businesses as well as homes, in terms of addressing regulated and unregulated carbon emissions | The policy will be amended in accordance with the suggestion. |
| DM EP4 | LoveWimbledon and Merton Chamber of Commerce | Page 109 – 7.40 – we welcome the use of Sustainable Urban Drainage Systems (SUDS) | Thanks for support. No action needed. |
| DM F1 | Environment Agency | DM F1: Support for flood risk management While we support the aims of this policy we recommend that some changes are made in order to strengthen it. The table included in this policy currently states in section for in Flood Zone 3b that ‘Developments classed as ‘highly vulnerable’ will not be permitted without Environment Agency approved mitigation measures.’ We believe this may be an error and in fact should be more vulnerable and relates to key sites with the borough which the council wishes to bring forward. We recommend that this section of the table is changed to read: More vulnerable development that is considered key to the delivery | The amendments were made as suggested. Developments classed as ‘more vulnerable’ will not be permitted unless it can be demonstrate that the wider sustainability benefits outweigh the flood zone 3b designation and the Environment Agency approves the proposed mitigation measures. |

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| | | of the boroughs wider aims may be acceptable provided that it can demonstrate that the wider sustainability benefits outweighs the designation of FZ 3b. The development will only be acceptable if it can demonstrate that it will be safe from and not increase flood risk off site. We recommend this modification as it is important that development within the functional floodplain does not set a precedent that allows other schemes to be approved. We feel it is also important as this is a departure from national policy. | |
| | Environment Agency | Although the supporting text from paragraph 8.2-8.5 mentions the borough Strategic Flood Risk Assessment (SFRA) including guidance on building design, site or area-specific Flood Risk Assessments and vulnerability, developments behind flood defences etc, there is no mention of SFRA in the policy wording itself. Therefore at [policy DM.F1] bullet (iv) we recommend inclusion of the following All development proposals must have regard to the Borough Strategic Flood Risk Assessment (SFRA) findings and recommendations and the Local Flood Risk Management Strategy. | The adopted Core Strategy policy and the proposed DMF1 cover both references to SFRA and LFRMS. |
| DM F2 | English Heritage | Policy DM F2 – The policy would benefit from a reference being made to the contextual qualities of a site being considered when developing sustainable drainage systems, waste water and water infrastructure. This includes consideration of any heritage assets and their significance. | Following advice from Merton conservation officers; the policy was amended in accordance with the suggestions made as follows: ‘Any development or re-development that impacts on a heritage asset or its setting (including conservation areas) has to consider Sustainable Drainage Systems (SuDS) and demonstrate within a Heritage Statement, the approach taken to ensure that there is no adverse impact on the character and appearance of the asset and also that there is no long term deterioration to the building’s fabric or fittings’. |

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| | Environment Agency | Paragraph 8.12 mentions the requirements of Local Flood Risk Management Strategy under the Flood and Water Management Act 2010. It would be prudent to include this on policy DM F2. As you are aware LLFAs are now mandated to manage local flood risk which means flood risk from (a) surface runoff, (b) groundwater, and (c) ordinary watercourses. | The policy was amended to make it more specific to SuDS as follows: 7.31. As required under the Flood and Water Management Act 2010 the council will monitor local flood risk in Merton through its Local Flood Risk Management Strategy (LFMS). The LFMS will manage local flood risk from all source including surface runoff, ground water and ordinary water courses. |
| | Natural England | DM F2 Sustainable Urban Drainage systems (SUDs) Natural England welcomes and encourages the use of SUDs where appropriate, as part of Green Infrastructure, Ecology/Biodiversity opportunities, where appropriate | Natural England support DM F2 policy . |
| | Thames Water | Thames Water support the policy in principle and that it has been amended to specifically relates to waste water and water infrastructure, but consider that it requires clarification in this respect. | Thames Water support the policy in principle.. |
| | Thames Water | A key sustainability objective for the preparation of the Local Development Framework/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the new National Planning Policy Framework (NPPF), March 2012, states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....” Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure | Action: additional wording added to text following comments from Thames Water. - 1.3 (8.3). <i>The Strategic Flood Risk Assessment (SFRA) producing, partnership with neighbouring boroughs</i> to highlight working with neighbouring boroughs and also under the Delivery and Monitoring heading 'continue working with neighbouring boroughs'. |

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| | | within their areas.” | |
| | Thames Water | <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel." Policy 5.15 of the London Plan relates to water use and supplies and states Planning decisions</p> <p>B Development should minimise the use of mains water by:</p> <p>a incorporating water saving measures and equipment</p> <p>b designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.</p> <p>C New development for sustainable water supply infrastructure, which has been selected within water companies' Water Resource Management Plans, will be supported.”</p> | Action: added to text - 'The council supports the principle of the Thames Tunnel to the policy' paragraph 7.30. Will need to get a statement of common ground from Thames Water regarding planned works and if they still feel that they can meet Merton's needs. |
| | Thames Water | <p>Whilst this is an improvement, it does not cover water supply and does not sufficiently waste water/sewerage infrastructure issues in accordance with the London Plan.</p> <p>It is considered that DMF2 e) should be amended along the lines of the following text:</p> <p>Take account of the capacity of existing off-site water and sewerage infrastructure and the impact of development proposals on them. Where necessary, the Council will seek improvements to water and/or sewerage infrastructure related and appropriate to the development so that the improvements are completed prior to occupation of the development.</p> <p>The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply</p> | Action – text was added to the policy in accordance with the suggestion made. |

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| | | and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised. | |
| | Thames Water | 8.26. All developments (including residential, residential care homes, hospitals and restaurants) that <u>connect to the public water supply and discharge s-water and</u> waste water into the public sewer will be required to provide confirmation from the local water and/or sewerage company that local <u>water supply/sewerage infrastructure</u> -has adequate capacity to serve the new development and existing surrounding developments. It is advised that this is carried out early in the design process and confirmation submitted as part of the SAB application. 8.27. The council will require new developments and re-developments to minimise water consumption and the pressure on the combined ensure sufficient sewerage capacity is available sewer network. Development proposals should incorporate water saving measures and equipment to reduce water consumption. Where a development has capacity problems and improvements in offsite infrastructure are not programmed by the water company, planning permission will only be granted <i>where the developer funds appropriate improvements which will be completed prior to occupation of the development</i> | The comments were accepted and added to the paragraph. |
| | Tree Warden Group Merton | Add to b) or d) a recommendation to encourage tree planting to help deal with flooding and drainage | Action: added reference to the use of appropriate planting (including tress) in mitigating against flooding in DM F2 policy. |
| DM T1 - T5 | Merton Cycling Campaign | These maps do not show the Strategic Cycle Network referred to in item 26.4 of the LDF. | The context of this reference relates more to a collective term for describing important cycle routes across the borough rather than a route designation indicating a specific status. No action is therefore necessary. |

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| | | <p>These maps do not demonstrate a 15 year Core Planning Strategy and do not demonstrate a clear Strategy for a shift away from private vehicles promoted in item 26.6 of the LDF</p> | <p>The cycle policies maps seek to identify proposed cycle routes that can realistically be delivered within the life span of the plan to achieve a series of continuous feeder routes. In some instance the proposed routes include existing facilities that will be reviewed and possibly improved. The policies map also needs to be considered alongside the Council's Bikeability maps, Biking Borough Strategy and other related policy, both at a national and regional level.</p> |
| | | <p>Despite active transport being emphasized in the transport section there is far too little emphasis on Active Transport in the Sub-Area Policies of the LDF. The Sub Area Policy Diagrams note 'Improve pedestrian links' but improving cycling links is not highlighted. If the Cycling Policies Maps had Strategic Routes delineated then Sub- Area policies could have had a considerable amount to say and include about cycling in relation to the Sub-Areas. Furthermore for general permeability, locations can be identified where giving priority or access to cyclists, can greatly benefit cyclists, but at little inconvenience to other users. For instance the relatively new DfT sign 'No Entry Except Cycles' is a cheap and easy way of opening up one-way streets to cycling. Recommendation: MCC recommend that Sub Area Policy Diagrams include 'Improve cycling links' in coordination with Strategic Cycling Policies Maps.</p> | <p>The Core Strategy was adopted on 13th July 2011 and the sub-area diagram can not be modified. No action is therefore necessary.</p> |
| | | <p>MCC are unable to accept the title of these maps as 'Cycling Network' or the category of routes as 'Existing Network'. This is not the 'comprehensive' and 'strategic' network referred to in the LDF. The maps show a mixture of roads/paths/tracks</p> | <p>A network can be defined as an interconnected group or system. However given the different typologies of route indicated the suggested wording could be considered more appropriate.</p> |

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| | | <p>highlighted that are individually seen as useful to cyclists. Some of them may be signed but they cannot necessarily be said to be safer than anywhere else, they do not show a 'Merton' Network. At the meeting of Jan 24th between MCC and the Council, Chris Chowns explained that the blue roads were taken from the TfL cycle maps. MCC find that several key linkages are missing. These linkages are well known to Merton they facilitate Merton's pre-existing Network strategies, installed as a result of costly consultants reports and implementation programmes, these must not be neglected. Recommendation. MCC recommend these maps be called 'Cycling Merton' as they currently do not represent a Network.</p> | <p>The cycle links to be included alongside other proposals of the Policies map.</p> |
| | | <p>The title 'Policies Map' is inappropriate, at present they appear to be short-term Proposal maps. MCC's primary Policy recommendation is that Merton firstly establish a principle of 'Care for Cyclists' on all roads with equal rights to personal safety for all road users. With regard to the Maps MCC recommend that Merton take the time now to turn these maps into Policy maps, where cycling routes prioritized for safe cycling continuity can be integrated to form a Strategic Plan. Routes should be considered N,S,E,W from significant shopping and commercial centres as well as schools and colleges and linking the main Merton Cycling Hubs.</p> | <p>The term policies map is derived from national policy and legislation. It is not derived by the council therefore no change can be made. The council considers the care of all road users on an equitable basis in accordance with relevant legislative frameworks and duties. All the policies maps sit alongside relevant policies defined in the Sites and Policies Plan and other related policy documents and maps, such as the boroughs Bikeability maps, which indicate the level of skill needed to cycle a particular route against nationally recognised standards of cycle ability. No action is therefore necessary.</p> |
| | | <p>Title: proposed 'Cycling Hubs' Colliers Wood, Morden and Wimbledon Cycling Hubs but not Mitcham which appears to be an error. However the radial route potential from Raynes Park, enlarged on in these comments, suggests that Raynes Park should also be</p> | <p>The locations for cycle hubs was identified from the Council's Biking Borough Strategy and do not preclude similar hubs being established in Mitcham or Raynes Park should proposals come forward. No action is therefore</p> |

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| | | considered as a proposed 'Cycling Hub'. | necessary. |
| | | <p>Title: Cycling Routes</p> <p>The maps show proposed 'Cycling Routes'. These are understood to designate where Merton proposes delivery of safe cycling continuity along the red marked line. MCC applaud the emphasis on continuity but find a Merton strategy lacking. Recommendation: Safe cycling continuity is rare in the Borough so there should be a priority programme of phased strategic improvements, of which these maps would highlight the first phase.</p> | The council is in regular dialog with MCC on the delivery of cycle routes across the borough including on going priorities. The proposed routes indicated inform this programme, although final delivery will be dependant on a number of factors including deliverability, third party support and funding. No action is therefore necessary. |
| | | <p>Title: Routes signed for use</p> <p>The maps show 'Routes signed for use' as a blue line. 'Routes signed for use' suggests two things (1) that LB Merton has identified and declared these routes to be suitable for cyclists of all ages (2) that Merton reduces consideration for the use of bicycles on all the roads not 'Signed for use', MCC do not find this acceptable. The Highway Code for young road users, aged 7-11 years, 'Tales of the Road' tells children that any blue cycle sign is a 'Recommended Route for Cycles'. TfL may be prepared to map and recommend routes that are unsuitable, but at the meeting discussing Merton High Street on Jan 24th 2013 it was clear that Merton Officers were not prepared to risk the straight adoption of TfL criteria. Recommendation: While Blue routes on these maps could be labelled 'A mixture of quiet and busier roads selected as useful for cycling by TfL'. MCC feel that Merton have a responsibility to identify their 'Recommended Routes for Cycles' and that these should be included on Policy Maps.</p> | For consistency, where possible the Council has adopted the same routes and colour coding adopted for TfL's Local Cycle Guide Map Series. |
| | | <p>Hub Analysis and Proposed Cycling Routes</p> <p>MCC welcome the proposed cycling routes on main roads and</p> | Where practicable the Council seeks to deliver new cycle facilities to the standards sent out in |

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| | assume that principles of cycling priority and safety will be combined to give continuity. Designing up to a standard, not down to a compromise, is the only way to significantly increase cycling levels. The London Cycling Campaign's Go Dutch principles should apply. | the London Cycle Design Guide produced by TfL. However, physical and financial constraints means this is not always achievable. |
| | Mitcham Map MCC applaud the route from Colliers Wood through Mitcham to Beddington Lane but significant work is needed to upgrade this unpleasant and dangerous route e.g. Significant work is needed on Western Road where there is almost no provision for cycling safely. | Agree. The council recognises the physical challenges in delivering the connect along Western Road to Colliers Wood. No change is required. |
| | Major work on the roundabout at Carshalton Road- Croydon Road. The traffic light scheme that Merton commissioned as a result of a cycling fatality should perhaps be re-considered. | This would be reviewed as part of any wider route review. This is not a relevant consideration within the Sites and Policies Plan. |
| | The Right turn into Beddington Lane and the road southward require severe attention. | This would be reviewed as part of any wider route review. This is not a relevant consideration within the Sites and Policies Plan. |
| | The Traffic lighted roundabout of London Road/Streatham Road requires tightening down to one lane to slow motorists. (Discussed between MCC/LBM on ride May 2012). | The Figges Marsh roundabout forms part of the Strategic Road Network and as such any highway modification will need to be supported by TfL. The roundabout probably needs a more comprehensive redesign rather than piecemeal changes to address movement issues. This is not a relevant consideration within the Sites and Policies Plan. |
| | Westbound on Streatham Road (to Mitcham Town Centre) MCC recommend a bus lane to extend from the Mitcham Industrial Estate Area. Precedents can be seen at Garratt Lane near Earlsfield Station and Queenstown Road. MCC | The refuge islands and hatching along Streatham Road were historically installed to address road safety concerns, including those involving vulnerable road users. These issues |

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| | recommend the removal of the camouflaged road narrowings on Streatham Road. | would need to be considered alongside any proposals to develop a cycle route, whilst improving bus reliability at the same time. This is not a relevant consideration within the Sites and Policies Plan. |
| | The London Road crossing Figges Marsh to Pitcairn Road should have stop/go cycle symbols for crossing. (Discussed between MCC/LBM on ride May 2012). | Detailed design issue – the comment was passed to the traffic team for consideration. This is not a relevant consideration within the Sites and Policies Plan. |
| | MCC welcomes the proposed 'Cycling Routes' through Mitcham Town Centre, but recommend that serious attempts to improve permeability throughout the surrounding roads to Mitcham Centre are made for pedestrians and cyclists. For instance making access through the wall between Chalkley Close and Clarendon Ground. Also a wheel friendly step-free bridge over the railway at Eastfield Station this could be accompanied by an upgrade of Sandy lane (Discussed between MCC/LBM on ride May 2012). | The Council intends to explore wider cycle access as part of its on going access proposals in conjunction with its Re-discover Mitcham Project. |
| | MCC also recommend the re-modelling of the triangular road layout of Lower Green West and London Road and suggest that the route south out of Mitcham down London Road should be given the red lined 'Cycling Route' priority of these maps and with Church Road extending 'Cycling Route' priority over its whole length. | The Council intends to explore wider cycle access as part of its on going access proposals in conjunction with its Re-discover Mitcham Project. Extend route southbound along London Road towards Cricket Green and link up with Western Road. |
| | Colliers Wood is an example of a maze of blue routes where Merton need to identify their 'Recommended Routes' dispersing from the end of CS7. | The Council's ultimate aim is to promote the extension of the cycle super highway in conjunction with TfL connected by a number of feeder routes. This will be explored in conjunction with updates to the councils Biking Borough Strategy. |
| | The No left turn sign at Christchurch Road needs removing. | Comment passed to traffic team for consideration in conjunction with planned |

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| | | | investment works being taken forward with TfL. This is not a relevant consideration within the Sites and Policies Plan. |
| | | Merton should use Compulsory Purchase powers to widen the pavement beside Baltic Close for crossing to Colliers Wood Underground Station. | Comment passed to traffic team for consideration in conjunction with planned investment works being taken forward with TfL. This is not a relevant consideration within the Sites and Policies Plan. |
| | | 'No cycling' signs need to be removed from the Greenway alongside the Tram Track between the North/South Morden Road and the Wandle Trail. A crossing of Morden Road to connect this Greenway with Dorset Road should be considered it is currently dangerous to cross at all. Both Dorset Road and Morden Road need to be made safer for cycling. Extending the bus lanes and making all 24 hour would improve Morden Road for cycling while the traffic speed in Dorset Road needs better cycle friendly reduction methods. | Detailed design issue – Comment passed to traffic team for consideration. This is not a relevant consideration within the Sites and Policies Plan. |
| | | MCC feel that the linkage of Morden and Mitcham is very unclear, Morden Hall Park is unlit and like all the Wandle Trail suffers from rough paths ponding when wet. MCC suggest a route along East/West Morden Road. | Include proposed cycle route via A239 London Road and A217 London Road, Lower Green West to link Morden and Mitcham TC's. Shown existing Morden Hall Road link (brown). Church Road is very narrow in places. May be scope for Quite Way in around Hallowfield Rd, Church Path and Miles Road. Pass to Traffic for further investigation. |
| | | A cycle Route along Epsom Road south to North Cheam is suggested. | A cycle route was shown along the A24 London Road in accordance with the suggestion. |
| | | Morden Park connections are not exploiting proposals that LB Merton has already surveyed, documented and promoted; firstly to the South East: Morden Park to Epsom Road crossing to Rutland Drive, Rustington Walk into Sutton | Shown as yellow routes on TfL cycle map – include as proposed routes. |

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| | <p>Common Recreation Ground. Then to the North West: Morden Park thru Car Park entrance into Hillcross Avenue, Monkleigh Road, Leamington Avenue to Cherrywood Lane and the Recreation Grounds. Then from the end of Whatley Avenue to a much needed crossing of Bushey Road to Prince Georges Avenue.</p> | |
| | <p>MCC hope that the proposed 'Cycling Route' work to the railside path Raynes Park to Lower Downs Road is to introduce the important lighting and to remedy faults in the surfacing the length of the railside path.</p> | <p>Detailed design issue – comment passed to traffic team for consideration. This is not a relevant consideration within the Sites and Policies Plan.</p> |
| | <p>MCC applaud the proposed link from West Barnes Lane, Raynes Park under the A3 towards Kingston, using the Raynes Park Recreation Ground.</p> | <p>Support. No action needed.</p> |
| | <p>The Martin Way and Bushey Road proposals are applauded, but what happens to the West end of the Bushey Road proposal at Grand Drive? What is the intention for meeting continuity criteria?</p> | <p>Given local road conditions and local physical constraints there are no obvious way to connect with existing routes. This will require careful and extensive investigations.</p> |
| | <p>MCC recommend the removal of restrictions to cycling from Bushey Mead across Grand Drive to Raynes Park Sports Ground.</p> | <p>Detailed design issue – comment passed to traffic team for consideration. This is not a relevant consideration within the Sites and Policies Plan.</p> |
| | <p>Routes from Raynes Park North are limited. MCC recommend the route that LB Merton has already surveyed, documented and promoted from Coombe Lane to Cottenham Park Road, Cottenham Drive, Ernle Road, Woodhayes Road to Westside Common. This could perhaps be linked to an East/West route along the Ridgway which would then serve the number of schools in the area.</p> | <p>Shown as yellow routes on TfL cycle map – include as proposed routes.</p> |
| | <p>MCC applaud the extension of the Railside Path from Raynes Park up to the crossing over to the forecourt of Wimbledon Station.</p> | <p>Support. No action needed.</p> |

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| | | The highlighted 'Steps' off the Railside Path are assumed to be a reminder that something must be done about them, on the pedestrian railway bridge and up towards Wimbledon Station. | Indirectly correct – more about connect link. This is not a relevant consideration within the Sites and Policies Plan. |
| | | If the Railside Path has an effective crossing of Lower Downs Road, while being generally lit, well surfaced and undergrowth trimmed, it would encourage cyclists who normally use Worple Road; if this cannot be achieved then serious consideration of upgrading Worple Road to be a parallel recommended route for cycling should be considered. . | Detailed design issue – comment passed to traffic team for consideration. This is not a relevant consideration within the Sites and Policies Plan. |
| | | Parkside to, and including, Wimbledon Hill Road is a route of some importance and should perhaps be raised to the category of Proposed 'Cycling Route'. | An alternative parallel shared use route exists via Wimbledon Common. However, this is not available during the hours of darkness- therefore the viability of developing an on-street route should be explored. Comment passed to traffic team for consideration. |
| | | Another North South route suitable as a 'Cycling Route' proposal would link Wimbledon Park with the Kingston Road and High Path East West Route, taking in Strathearn Road, Gap Road, Ashcombe, Trinity and Montague Roads to Kingston Road and Brisbane Avenue. | Accepted and proposed. |
| | | It is worth noting that between Dorset Road to Melbourne Road and then High Path there are 14 barriers which make it hostile to cycling and impossible with a cargo bike. This route allows cycling but does not enable or encourage it. | Detailed design issue – comment passed to traffic team for consideration. This is not a relevant consideration within the Sites and Policies Plan. |
| | | On the High Path route itself there is a lot of rat running conflicting dangerously with cycling at two points (i.e. cars turning across the cycle route). MCC recommend that Merton should take measures to stop the rat running through this area. | This has been explored by the Council's traffic team in the past. Proposal not taken forward due to wider traffic management issues. This is not a relevant consideration within the Sites and Policies Plan. |
| | | Stanley Road and Kings Road, going North out of the Broadway, MCC recommend should be made 2-way for | Detailed design issue – comment passed to traffic team for consideration. This is not a |

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| | | cycling. | relevant consideration within the Sites and Policies Plan. |
| | | <p>Missed key links (Probably not a complete list):</p> <p>Between Devonshire Road and Myrna Close</p> <p>Between Garfield Road and North Road</p> <p>The skew arch Raynes Park</p> <p>Between Coppice Close and Fairway</p> <p>Between Wilton Grove and Kingston Road</p> <p>Between Kingswood Road and Dundonald Road</p> | The amendments were made in accordance with the suggestions. |
| | | <p>Carshalton Road is a Strategic Route.</p> <p>Cycle infrastructure round Vestry Hall-Cricket Green is strategically important.</p> <p>Durnsford Road, Haydons Road is a Strategic Cycle Route and Durnsford Road railway bridge requires action.</p> <p>Bridge Road, Merton Road, Morden Road up to Tramlink is a Strategic Cycle Route.</p> <p>Morden Road to Lombard Road to Wandle Trail is a Strategic Cycle Route</p> <p>Morden Hall Road is a Strategic Cycle Route</p> <p>The Wandle Trail is missing between Merantun Way and Phipps Bridge Road.</p> <p>Mansel Road, Raymond Road plus that section at the east end of Worple Road are Strategic Cycle Routes.</p> | The amendments were made in accordance with the suggestions. |
| | | Coombe lane is shown as a Greenway rather than 'Separate on Road' across Shannon Corner to Burlington Road is a Merton Strategic Proposal. | The amendment was made in accordance with the suggestion. |

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| DM T1 - T6 | Wimbledon Society | <p>It would be helpful to have a “logical” listing of the different types of route: eg:</p> <ul style="list-style-type: none"> * Entirely Segregated: * Segregated and within The Common and open spaces: * Shared with footways by marking: * On the roadway but marked out as a side strip: * Signposted but not marked out: | <p>The key used has been aligned with London wide “Local Cycling Guide” map series produced by TfL to offer some consistency. The Council intends to work up a more comprehensive and detailed cycle map in conjunction with a review of its biking Borough Strategy and Bikeability Report.</p> |
| | | <p>Consider (where steps are shown) “Future elimination of steps” in the key. The potential for a radical improvement of the current cycle path facilities is very evident, but the whole Plan currently is still very low key on this issue.</p> | <p>The steps form part of Network Rail Structures. Should these structure be upgraded then opportunity will be taken to lobby for improved access for cyclists.</p> |
| | | <p>* Has enough thought been given to the opportunity to create new public footpath/cycle links through sites when they are developed (eg Pitcairn Road)?</p> | <p>This will generally be explored on a case by case basis and negotiation where it can be justified.</p> |
| | | <p>The headings could be simplified as sustainable transport, transport impact of development, car parking and standards, transport infrastructure, and access to road networks.</p> | <p>Agreed – heading modified.</p> |
| | | <p>Policy (c) for enhancing pedestrian and cycle routes is welcomed: But this should be expanded, with additional policies. Creating new paths through development sites where there is a significant block to movement on a locality (eg Mansell Road through to Worple Mews); Widening existing narrow routes: and Eliminating steps that limit everyday use by re-shaping the route (eg the rail bridge steps from Alt Grove, and the railway path steps behind the St Georges Road development). Rather than go through the draft transport sections in detail, the issues that need addressing include:</p> | <p>insert - where gaps “or barriers to movement” are identified in DM T1 c)</p> |
| | | <p>Also, the numbers of parking spaces that are needed to properly service the operation of all these centres is of vital</p> | <p>The Management of Council operated off-street car parks or on-street parking is the</p> |

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| | | importance, being both on-street and off-street, both publicly and privately provided: And there needs to be co-ordination of their charges and free periods; | responsibility of the Council or appropriate highway authority who set objectives and priorities in accordance with government, London and local policy. Private parking standards are in accordance with the local plan. Decisions on pricing structures etc are the responsibility of elected Members. |
| | | Access to new developments is currently too formulaic: the principal design criterion should be the character of the locality and street, and not the preferred traffic solution. An example is the Edge Hill development where many local houses have their access direct from that street, yet the new development had to have an internal service road, which seems perverse and a waste of site area. Traffic doctrine requirements have to be secondary to good urban design and local distinctiveness, and an additional policy should make this clear. | TfL's road task force is reviewing the moving and living functions of streets and appear to be moving toward adopting a framework of typologies, which better recognises the different varieties and changing functions of streets. Modify DM T5 a) road hierarchy “, respect the local street character and environment”. |
| | | There should be better access to stations (for example from Alexandra Road), and better connections between the stations and the bus stops, with weather protection. Wimbledon Station needs to be improved, prior to the bringing in of the various service enhancement projects. | The Council actively engages with the rail industry and its partners to improve accessibility to the rail network, including promoting infrastructure improvements where schemes are brought forward e.g. Mitcham Eastfields and Mitcham Junction Stations. |
| | | Traffic signalling should be set to control vehicles speeding: | Traffic signals across London are controlled and maintained by TfL. Their primary function is the safe, efficient and smooth movement of traffic including pedestrians. They are not specifically intended for use as a speed control device. |
| | | Allowable Traffic speeds in both residential areas and town/local centres need to be reviewed, and 20mph zones extended, with regulating measures and “policing” improved. | This is primarily a borough policy issue rather than development policy issue, although scope exists within transport policies to support homezones as part of new development. |

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| DM T2 | English Heritage | Policy DM T2 – Reflecting our previous comments the policy could benefit from a need to for development to take account of existing a potential transport capacity levels. The concern is that transport infrastructure provision could be amended to accommodate development proposals that in turn could have an adverse impact upon the significance of heritage assets. This is through the nature of the development and the changes made to the transport infrastructure e.g. displacement of traffic to sensitive locations, or inappropriate amendments in the road layout that could harm the setting of heritage assets. | No changes are made to the policy as the whole thrust is towards sustainable development and any major/significant proposal would have to prepare a Transport Assessment. This would need to assess the impact of all modes including public transport. Further policy direction is included elsewhere in the design policies. |
| Transport Proposals | GLA | TfL have no intention of providing a tram stop at Willow Lane so please remove reference | TfL have already provided passive provision for a tramstop and agreed with LBM that if funding is raised, they would provide one. No action is therefore proposed. |
| | Unknown - name not clear | Crossrail 2 proposal not included. | Current advice from Crossrail 2 is not to include alignment on policies map. No action needed. |
| | Wimbledon Society | 05TN Should there be a reference to Crossrail 2 for Wimbledon Station (see page 215)? | On going advice is not to include Crossrail2 proposals until routes options are better defined. |
| | | 12TN Include semi-pedestrianisation in 12TN (see pages 215/219)? | See policies map comments above. |
| | | 23TN Include a reference to the Wimbledon Way pedestrian priority route, initially from the Station to the All England Tennis, as an Olympic Legacy project 2012m long: and then extended along the Broadway to the Polka, and along Parkside to the Windmill. | See policies map comments above. |
| Transport Proposals: page 215: 04TN and 08TN: Wimbledon Station and Crossrail 2 and Tram works: Suggest add phrase: "WITH ADDITIONAL PEDESTRIAN ENTRANCES TO THE ENLARGED STATION, FROM ALEXANDRA ROAD AND/OR QUEENS ROAD." | TfL are planning to undertake a strategic consultation on Crossrail2 route options. A Mayoral decision on the preferred route alignment is expected Autumn 2013. The Department of Transport will follow this up with | | |

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| | | <p>This is to make the Station more accessible from the local area, and avoid the need for all passengers to use the existing single entrance to what will be an even more important and busy rail interchange.</p> <p>It also keeps open the possibility of a pedestrian/cycle link route across the tracks at the northern end of the Station. Additionally, include a reference to the desirability of bringing in escalators and better lifts for this enhanced station. The essential point here is that the Crossrail 2 and other track and service improvements need to be accompanied by significant improvements to the actual station building itself.</p> | <p>a Safeguarding Consultation in spring 2014. Current advice from Crossrail/TfL is not to include potential alignments on emerging Proposal Maps until the Safeguarding has been approved. No change is therefore needed.</p> |
| | | <p>Transport Proposals: page 215: 12TN: Suggest Add phrase: "...pedestrian environment, INCLUDING THE WIMBLEDON WAY, WITH SEMI PEDESTRIANISATION AND removal of one way system." This is part of the current Olympic Legacy proposal being formulated by a working group, about to be considered in more detail by the Council.</p> | <p>For the most part, the existing description is generic of the type and scope of measures to be taken forward rather than an inclusive menu. The potential for semi pedestrianisation of The Broadway and Wimbledon Way can be considered alongside other ideas in association with any future feasibility work aimed at removing the one-way system and other public realm works and therefore does not specifically need to be referenced.</p> |

Table 4: Summary of representations received during Stage 3 regarding appendices and the policies map

| Section | Respondent | Comments from respondent | Action/Comment |
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| Policies map – open space or similar issue | Boyle, M | It is fairly certain that the two stands of trees support bat roosts, the grass mowing regime is being relaxed and its species composition enhanced. In short, this area has nature conservation interest and should therefore be within the Ravensbury Park SINC, except for play space area. | The change was made following validation from the London Wildlife Sites Board. |
| Policies map – open space or similar issue | GPG No 5 Ltd | Remove the site of the recently implemented Planning Permission (06/P0320) for a medical centre, café and nursery (nursery has not been built yet) from the open space, green corridor Wandle Valley Regional Park designations. | <p>The site has been excluded from the WVRP because the medical and nursery use is not ancillary to the park's use and would not be in accordance with the objectives of the WVAF. The site have been excluded from the green corridor and only a small part of the site, the part along the eastern side of the site that is within MOL, is within designated open space.</p> <p>With application 06/P0320 the argument that the modest replacement café, public toilets and park warden's office was acceptable ancillary uses to the MOL, was accepted. The MOL and open space boundary should therefore not be changed fundamentally and the café, public toilets and park wardens office should be included in these designated areas. Only minor changes to the MOL boundary are proposed at the eastern side of the site so that it is a rational and easily identifiable boundary. The boundary rationalisation includes an approximately 3m wide (51m²) reduction at the northeastern corner of the site and an approximately 3m wide (53m²) increase at the southeastern corner of the site. The open</p> |

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| | | | space and Wandle Valley Regional Park boundaries follow the MOL boundary alignment. The green corridor boundary is along the fence surrounding the new building. No change is therefore proposed. |
| Policies map – open space or similar issue | Greater London Scout County | Scout site no connection or access to adjacent playing fields. Originally builders yard for houses on Cannon Hill Lane. No public access. 50% hard standing, 10% building, remainder overgrown. Very small (0.1ha) so meets criterion for small space. Non standard shape | The area was removed from open space. Not open space as it meets the exclusion criteria for 'Very small areas'. |
| Policies map – open space or similar issue | Groves. Cllr Maurice | Be aware of the land beside the Scout Hut site (to the right from the entrance) has 9 Tree Protection Orders on it. | Noted. No action needed. |
| Policies map – open space or similar issue | Kings College School | The boundaries of the Open Space have (in the main) been significantly extended beyond the 2003 UDP areas to include land and buildings that we think do not warrant inclusion, and continues to include land and buildings that we think should be excluded (<i>officers note - details of exclusions separately</i>) King's College School is currently one of the best in the country being in the top 10 academically. It educates some 1300 pupils every year and employs around 270 staff. It also has a significant outreach programme with local schools which takes place every Friday. The twelve projects identified in the master plan are critical to its future and the open space proposals being put forward, if accepted, would put this development in jeopardy. For the reasons set out the school believes that the four areas described should not be designated open space. | The master plan is not an adopted council document and is therefore not a material consideration. Details of any amendments will be considered on a case by case basis. No action needed. |
| Policies map – open space or similar issue | Kings College School | Objection to include a 'sunken' area of all-weather tennis courts including floodlights, boundary fencing and pavilion adjacent to the existing Sports Hall because site not of "public value" (NPPF) - can't be seen from public view because of | The area was removed from open space. If the public can't see the tennis courts and can't access them, and the land has no unique features that should be preserved for future |

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| | | existing buildings and sunken nature. Courts are ancillary to existing sports hall. | generations, it can't be said that the land is of public value. Public access is however not a relevant matter. MOSS 2011 shows Kings College has a total of 18 tennis courts: 6 dedicated for tennis (this site) and another 12 artificial grass pitches on which tennis can be played. No action needed. |
| Policies map – open space or similar issue | Kings College School | Objection to the continued inclusion of an area currently the subject of a planning application (ref no. 13/P0090) for new classrooms and multi-use hall adjacent to the existing science block. Planning app due to be determined before Development Plan finalised, and if approved, open space designation should be removed. Case made in planning app for this development is: this is a residual area used by pupils at break-time for informal recreation if the weather permits; Its loss would not affect the functionality of the adjacent rugby pitch; It will not 'break up' an extensive area of open space. The proposed building includes a multi-function hall which will include indoor sports use which will improve the availability of sports/recreation over the current situation. | Yes - the area was removed from open space. If any planning applications approved change designations before the Sites and Policies Plan is finalised, then these new designations would be included on Policies Map. |
| Policies map – open space or similar issue | Kings College School | Object to continued inclusion of the existing maintenance building. The maintenance building is large, with a frontage to Ridgway of 35m and a height of some 4m. It forms a strong visual barrier to the open space beyond. It is not ancillary to the open space because it is used as workshops and for storage relating to the whole school estate (not just the open space). For this reason, and by virtue of its scale when considered together with the adjacent house, it does not warrant inclusion as open space. | Yes - the area was removed from open space because it is not ancillary to open space and meets council criteria for exclusion if non-ancillary. |
| Policies map – open space or similar issue | Kings College School | Object to continued inclusion of main school, coach/car park. The car/coach park is regularly occupied with high sided vehicles and thus again forms a visual barrier to open space | The area was removed from open space. The further evidence submitted on 17/04/2013 shows that this parking area is not ancillary to |

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| | | beyond. It is not ancillary to that open space because it is used for the parking of school minibuses, teacher and visitor vehicles and coaches used for transporting pupils to and from the school, rather than exclusively for sports use on the open space. | the adjacent open space therefore does not meet council criteria for inclusion in open space. |
| Policies map – open space or similar issue | Kings College School | Objection to continued inclusion of site manager’s house, adjacent to Ridgeway road. The Site Manager’s house is a private residence and should therefore be excluded from the Open Space designation as it does not meet the definition for inclusion set down by Officers. | The area was removed from open space. The dwelling is not ancillary to the open space and therefore does not meet council criteria for inclusion in open space. |
| Policies map – open space or similar issue | Kings College School | Objection to inclusion of existing swimming pool. This is an indoor swimming pool and is not ancillary to any adjacent open space. It does not therefore meet the Council’s definition of open space and should remain excluded as per the 2003 UDP designation. | The area was removed from open space. Covered swimming pools, tennis courts, gyms etc not ancillary to open space use, therefore do not meet criteria. |
| Policies map – open space or similar issue | London Borough of Merton Children Schools and Families | I wish to propose that the area within the school grounds of Abbotsbury Primary School is no longer designated a SINC. As the need for school sport has again increased the school has found it increasingly difficult to deliver the PE curriculum due to the restricted external space at the school when the SINC is not taken into account. While the field area should provide plenty of space for the children to enjoy, the restriction of the SINC means that no area of the field can be cut appropriately for the school to provide PE, games, and even lunchtime play in the summer as long grass stays wet for a prolonged period after any rain. There are also budget issues in that the school do not feel able to pay for maintenance of the facility for a SINC within their grounds when the school pupils get little benefit from it. It is therefore felt that removal of the SINC designation will better meet open space and education planning policies by providing an open space which children will be able to benefit from for sport and play. | Insufficient grounds for SINC boundary rationalisation. Green spaces team officers will be meeting with the head teacher to discuss suitable solutions so that the children can enjoy this part of the site, while its management as a SINC is not compromised. No action is needed. |

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| Policies map – open space or similar issue | Longthornton redevelopment working party | It appears that one area marked on your map has not been included in the list. Oakleigh Way Park is marked as M040 on your map in grid reference C4 but is not listed amongst the other parks and open spaces. | Although this site, which is on the boundary between the Mitcham and Colliers Wood areas, was unfortunately missed off the Mitcham list, it was listed on the Colliers Wood list on page 278. In the Submission document there is only one list of sites. No action needed. |
| Policies map – open space or similar issue | Merton Tree Wardens Group | The Canons, Mitcham should be included to the Wandle Valley Regional Park boundary. | Agreed and importantly, in accordance with Core Strategy paragraph 15.9, the WVRP Board also agreed. The change was made accordingly. |
| Policies map – open space or similar issue | National Trust | Thanks you for your reply which is immensely reassuring to us. To confirm the National Trust is the freeholder for the land occupied by Capital Gardens and they have a leasehold interest. We are aware of their representation in the stage 2 consultations. Our reply, in essence is that the MOL designation serves a distinct and different planning purpose to the Historic Park and Garden (Registered Landscape) and Conservation Area designations. In the longer term interests of the land it should remain contiguous with the whole MOL and not be divided because the car park and structures constitute development. We also rely upon the strategic allocation in the London Plan and the fact that the land is within National Trust ownership and as such serves a purpose to provide public benefit in this case. | Agreed. The Inspector for the 2003 UDP EiP considered and rejected a similar proposal. There have since been no major changes to the site or with regards to the considerations for the exclusion of land from MOL. No action is therefore needed. |
| Policies map – open space or similar issue | Wimbledon Society | Map i1: Metropolitan Open Land (MOL): (Wimbledon Common): Page 586: According to the maps of the Common produced by the Conservators, it appears that the Common extends across “The Green” to include the land occupied by the War Memorial, and also the small area of green space beside number 4. These two areas therefore, should (subject to a check with the | MOL - this area is clearly distinguishable from the neighbouring built up area and therefore contributes to the physical structure of this part of Wimbledon and its common. Open space - although each portion is small, and separated from the large portion of common land by adopted highway, they do appear to be part of the common and have |

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| | | Ranger's Office) be added to the MOL. This correction will be needed to a number of maps in the document, including green corridor. | public value as a part of the whole open space area. Green Corridor - both portions are separated from the large portion of common land by a relatively busy road, do not function as a link to another site and the War Memorial site in particular appears to have limited biodiversity value. Action - include in MOL, but only War Memorial in open space and neither in green corridor. |
| Policies map – open space or similar issue | Wimbledon Society | Map i1: MOL: page 586: The green area beside Woodhayes and bounded by the Crooked Billet, (M043 on page 595) and being opposite Wright's Alley and Southside House, should be shown as part of the MOL and should be in green corridor. | MOL - The approximately 28m gap between the corner house at 1 West Side Common and King's College school's Great Hall on South Side, effectively forms a corner for this part of Wimbledon Common. This relatively small, enclosed, triangular open space, measuring approximate 150m at its longest and 40m at its widest point, does not have a sense of openness or contribute <i>"to the physical structure of London by being clearly distinguishable from the built up area"</i> and will be protected effectively by the open space designation. Green corridor - The approximately 40m gap to the west and the 22m gap to the east is considered to be too severe for this site to function as a "relatively continuous" (southern) link between Cannizaro Park and Wimbledon Common. Based on this information no changes are made. |
| Policies map – open space or similar issue | Wimbledon Society | Map i1: MOL: page 502: A010: Oakwood Road. MOL reduction. Previous MOL designations, in the Council's formal plans, | No change was made based on the following information. The council approved planning application 08/P1163 after the Secretary of |

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| | | <p>included this end property as part of the MOL greenway strip which links Oakwood Road to Cottenham Park Road.</p> <p>Many properties exist in designated Green Belt (MOL is equivalent to Green Belt says the London Plan) and the practical effect is that they are only able to increase their building footprint by a small amount, so as to retain the openness of the GB/MOL.</p> <p>This is being constantly re-affirmed by Inspectors' decisions at appeals.</p> <p>Removal of the MOL designation in this case would allow significant rear extension, or within-rear-garden development, perhaps as PD.</p> <p>This would add significant building footprint into what is currently an open area.</p> <p>So the originally defined MOL designation should therefore be retained as existing, and the proposed modification should not be accepted.</p> | <p>State considered the case but decided not to intervene. The officers report included the following paragraph:</p> <p><i>"1.5 The side garden at 37 Oakwood Road, which forms the current proposal site, has been wrongly designated as MoL. This parcel of land was purchased by the applicant over 30 years ago and the Council acknowledges that a drafting error occurred in the subsequent UDP policies map. This error only became apparent to the Council and the applicant following the grant of planning permission in 2007 for a new attached dwelling house (07/P2780). The Council has agreed that this parcel of land should be re-designated as part of the LDF process so that no part of the garden land at 37 Oakwood Road is shown as being MoL. This technicality does not inhibit the Council in terms of being able to make the recommendation now, provided that correct procedure is followed to refer the application to GoL"</i></p> <p><i>The residential property will also not conform with open space criteria and therefore this boundary should also be moved to the existing property boundary.</i></p> <p><i>For Information - the subject area/amendment measures 200sqm</i></p> |
| Policies map – open space or similar issue | Wimbledon Society | <p>Consider adding Wimbledon Hill Road (northern side), being a link between Town and Village, as a Green Corridor.</p> <p>This is far more than a line of street trees, it is a significant green strip, and part of a conservation area, and an integral part of the Wimbledon Way.</p> | <p>This is an isolated green strip that does not connect to any existing green corridors therefore no action is needed.</p> |

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| Policies map – open space or similar issue | Wimbledon Society | Consider adding in the open green area at the front of Eagle House, Village High Street (as designated open space): A private space, used for garden plus vehicle parking, but in full public view, with several trees; listed railings as well as a listed main building. Roughly the same size as the enclosed private Galustian Garden off St Mark’s Place. | This approximately 1000m ² area of private space does not meet the criteria for open space (‘very small areas’). The space in front of the building makes a positive contribution to the setting of the listed building and its contribution to this part of Wimbledon Village will be considered as part of the borough-wide Character Assessments that are currently underway. No change is therefore proposed. |
| Policies map – open space or similar issue | Wimbledon Society | Add the half circle at the junction of Murray Road and Southside to the areas designated as open space. | Although this 1100m ² portion (and the adjacent smaller portions to the south of Southside Common) appears to be part of Wimbledon Common and therefore contribute to the openness and physical structure of this part of London (as MOL), due to its proximity and size in relation to the common and the fact that it is surrounded by adopted highway, this land has limited recreational and sporting function and does not warrant safeguarding as open space. No change is therefore proposed. |
| Policies map – open space or similar issue | Wimbledon Society | Should the green strip (The Chase) between the Kingston Road and Merton Hall Road be included in the Green Chain, being contiguous with the rail strip and an open space? The open space beside the school and Merton Hall Road is not shown, but is shown map C2 on p449. | <p>Although the response refers to “Green Chains”, in the context of the sentence it is assumed it should have been ‘Green Corridor’.</p> <p>‘The Chase’ is a SINC and therefore the Green Corridor has been amended to incorporate this area.</p> <p>The open space area south of the school buildings and beside Merton Hall Road is proposed as open space and is therefore shown map C2 on p449. The map on p411 does not include/show open space.</p> |

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| Policies map – open space or similar issue | Wimbledon Society | It would be helpful to show a feint mapping of the areas immediately outside the Borough boundary; (this applies generally to all such maps). | The Policies Maps were amended to show feint mapping within the adjoining boroughs. |
| Policies map – open space or similar issue | Wimbledon Society | Should not the open space at the corner of Dennis Park Crescent be included as a small open space? Ditto the space beside Toynbee Road? | Due to the location (in relation to other publically accessible open spaces), relatively low local traffic volumes, size and shape of the open space in the Dennis Park Crescent, it has potential to function as a pocket park therefore it was included. The Toynbee Road space is too small and narrow therefore does not meet the criteria and was excluded from the designation. |
| Policies map – open space or similar issue | Wimbledon Society | Consider adding site W007 (Rookwood Road) as a SINC, linked by the riverside path alongside the Beverley Brook. | The Council's ecologist has visited and assessed the site which was found to have " <i>bramble, tall herbs, elm scrub etc</i> ". Although it does not currently qualify for SINC protection status, its protection as part of a Green Corridor is proposed to be retained and it is proposed to be protected as open space. No change to the SINC designation is therefore proposed. |
| Policies map – open space or similar issue | Wimbledon Society | As some of these “greenspace” maps do not aim to show “other” defined open spaces, might it be helpful to make this clear by perhaps a note on the various relevant maps? | The changes have therefore been made. |
| Policies map - cycling proposals | Merton Cycling Campaign | Various suggests to proposed cycle network and gaps in existing network | Action – policies map was modified accordingly. |
| Policies map - transport proposals | Wimbledon society | Various suggests to improve policies map | Minor modifications to policies made in accordance with the suggestion. |
| General - Crossrail 2 | Name not clear | Crossrail 2 proposal not included | Current advice from Crossrail 2 is not to include alignment on policies map. No action needed. |

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| Policies map - town centre boundaries | Fisher. P | Raynes Park town centre boundary. Respondent is pleased that Raynes Park town centre boundary has been extended, though they are of the opinion that the boundary has not been extended far enough. Argues for the town centre boundary to be in line with that of the Raynes Park Enhancement Plan - as the area's local facilities and commercial are likely to increase in the next decade to support the extensive amount of additional residential accommodation that has been/ will be built in the Raynes Park Area and also to include three bus stops and the area up to Durham Road neighbourhood parade. | Raynes Park Enhancement Plan shows a boundary where the council intended to invest funding to improve the public realm. If we extended to the boundary to reflect that of Raynes Park Enhancement Plan, it would include residential areas that do not need to be in a town centre boundary and would allow more town centre type uses to be developed in out of centre locations that would be physically separated from the main core of Raynes Park town centre. No action needed. |
| Policies map - town centre boundaries | Living Streets | Unclear of where Arthur Road local centre is located and identified in the Sites and Policies DPD. | Living Streets were advised of the designations surrounding Arthur Road. No further comments were received. No further action needed. |
| Policies map - town centre boundaries | Mitcham Village Residents Association | They support the new, tight town centre boundary proposed for Mitcham town centre. | We welcome the respondents support. No action needed. |
| Policies map - town centre boundaries | Mitcham Village Residents Association | Policies Map. We support the new, tighter, boundary proposed for Mitcham Town Centre | No action needed. |
| Policies map - town centre boundaries | Plant. J | They welcome the current extension to the Raynes park town centre boundary but argue that it should be extended further to include the Rock Restaurant and the commercial parade opposite and in West Barnes Lane and it should be in line with the adopted Raynes Park Enhancement Plan Area. | Raynes Park Enhancement Plan shows a boundary where the council intended to invest funding to improve the public realm. If we extended to the boundary to reflect that of Raynes Park Enhancement Plan, it would include residential areas that do not need to be in a town centre boundary and would allow more town centre type uses to be developed in out of centre locations that would be physically separated from the main core of Raynes Park |

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| | | | town centre. No action needed. |
| Policies map - town centre boundaries | Transport for London (TfL) | inclusion of site 61 (Morden station car park) in town centre boundary | The site is not a town centre site and is considered to be separated from the area desired to be part of the town centre. The site is therefore not considered to be an appropriate location for town centre type uses or shopping frontage. The site fronts Kenley Road which is a residential street. The Morden Station planning brief is considering a number of sites in and around Morden town centre which will guide development on the site. This planning brief is being prepared in conjunction with TfL. No action needed. |
| Policies map - town centre boundaries | Waitrose | They support the proposed boundary of Raynes Park Local centre insofar that it includes the Waitrose Store. | We welcome the respondents support. No action needed. |
| Policies map - town centre boundaries | Ward. J L | Objection to the inclusion of 40 - 54 Christchurch Road and grounds being included in Colliers Wood town centre boundary; 1) as there has been no Public consultation and no letters of notification of intent have been sent to residents 2) to demolish existing homes and gardens and commercial area encroach further into a residential area 3) planning officers do not have plans for the area 4) Proposal for this area have been rejected for the 1991 UDP 5) development on the proposed site would be detrimental to Colliers Wood. | We have previously explained to JL Ward that because these areas are included in the town centre boundary does not mean that the council will CPO these properties and that this is a public consultation allowing residents and other key stakeholders to provide feedback on this document to the council. These units were included in Merton's UDP town centre boundary and will be integral to the creation of a physical and coherent town centre for Colliers Wood. No action needed. |
| Policies map – industrial areas | GLA | Accept in principle that SIL can be changed to LSIS in this location. But note that subject to London Plan redesignation going through examination in 2013-14 | No action needed. |

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| Policies map – industrial areas | Nicholas. J D | Supports the proposed change from a Strategic Industrial Location to a Locally Significant Industrial Area subject to adoption in future revisions of the London Plan. | We welcome the respondents support. No action needed. |
| Appendix E | Wimbledon Society | A note saying that these areas are identified on the Policies map would be helpful. | Action - the amendment was made. This update will improve the documents reader friendliness. |
| Appendix G | Wimbledon Society | A note that these areas are identified on the Policies map would be helpful | Action - the amendment was made. This update will improve the documents reader friendliness. |
| Appendix Glossary | Wimbledon Society | To consider adding the following Flood Zones, Heritage Assets, Historic Building, Locally listed building, community facilities, PTAL. | Action – the relevant amendments were made. This update will improve the documents reader friendliness. |
| General | Wimbledon Society | An additional policy is needed on the re-conversion of flats back into single houses, which is resulting in a net loss of housing stock (see Core Strategy Policy CS9a). | No action needed. This is adequately covered by the Core Strategy policies CS9 and CS14. |

Table 5: Summary of representations received during Stage 4 regarding development policies

| Policy | Respondent | Comments from respondent | Action/Comment |
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| DM R1 | Merton Priory Homes | 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. | Noted with thanks |
| DM R1 | The Co-operative Group | The existing Co-operative store should be identified as a mixed use development site (A1 to A5, D1 and D2 Uses); and The Co-operative store car park should be included within the designated neighbourhood parade. | Not taken forward. Ref: 12/p0493/New is a report completed after a pre-application meeting and does not represent planning permission. The applications would still need to gain planning permission before development could commence on-site. Neighbourhood parades are not recognised as town centres in the National Planning Policy Frameworks definition of town centres. As detailed in the retail policies in the Sites and Policies Plan, neighbourhood parades were designated to protect the uses that serve local essential needs such as convenience shops, GP's, post offices etc within walking distance of local residents not to allocate land for additional development. The sites referred to were not submitted as part of the earlier consultation and call for site allocations. |
| DM R1 | Mayor's office for Policing | Earlier representations sought flexibility within this policy seeking policing facilities to be located within high streets where appropriate. This would allow for public access points and front counters to be | No amendment to this policy is required. Policy DM R1 relates to the scale and function of town centres and does not preclude policing facilities rather instead encourages community uses |

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| | | established in areas which are highly accessible to the public, meeting the aims of the MOPAC strategies. | (which would technically include police shops) to Merton's town centres and neighbourhood parades. |
| DM R1 | Kames Capital | Minor amendment to text. | Noted with thanks. |
| DM R1 | Wimbledon Society | The policy should better align with the Core Strategy. | Noted. Policy CS7 is Merton's overall strategy for retail and town centre type uses in Merton. The Core Strategy forms part of Merton's local plan, as will the Sites and Policies Plan, and in accordance with the NPPF and guidance (as amended), does not need to be repeated in this document. |
| DM R1 | Wimbledon Society | The land use policies at present are not very clear in this document but are acknowledged as covering appropriate matters. | Noted. |
| DM R1 | Wimbledon Society | DMR1a(ii): The upper limit of 1,000sqm for a unit in Wimbledon Village should not be accepted, and is far too large: larger than any other retail unit locally. | Noted - no amendments to policy are proposed. Part c) of DM R1 prevents the amalgamation of existing units in the high street in order to retain small units. Only new development up to 1,000m ² that are commensurate to the scale and function of the area would be allowed in this location. There are existing units in Wimbledon Village and Arthur Road that are over 280m ² in floorspace. |
| DM R2 | Waitrose | Waitrose recommends that within the proposed allocation for development of 'the intensification of sporting activity (Class D2 Use) with enabling development' should explicitly require any planning application for retail development to satisfy the retail planning policy tests included within Core Strategy Policy CS7 and emerging Sites and Policies Plan Policy DM R2. | Not taken forward. The council expects all site allocation proposals to comply with Local Plan policies unless explicitly stated. Repetition is not necessary. |
| DM R3 | Merton Council Director of | I am concerned that classes of retail outlets seem to be | Not taken forward. Corner shops do not only |

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| | public health | protected, even though they may harm health; for example corner stores that are able to survive only by selling alcohol. | sell alcohol but they also sell a wide range of convenience items such as bread, milk and butter as well as other food items that are required on a daily basis. The purpose of this policy is to ensure that all homes in Merton are within 5 mins walk of a local store that can provide essential daily items, should residents be unwilling or unable to travel by car to a town centre or larger store. |
| DM R4 | Merton Council Director of public health | I am concerned that retail outlets such as banks can change to betting shops with no further authorisation from government planners. This is something that needs to be watched as there is clear evidence that not only betting shops but also fast food, alcohol and payday loan outlets target deprived areas such as the east of Merton. | Agreed and the council will continue to monitor the issue. A change to the policy approach is not required. |
| DM R4 | Merton Priory Homes | 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. | Noted with thanks. |
| DM R4 | Mayor's office for Policing | Earlier representations sought flexibility within this policy seeking policing facilities to be located within high streets where appropriate. This would allow for public access points and front counters to be established in areas which are highly accessible to the public, meeting the aims of the MOPAC strategies. The GLA have published their Draft Town Centres SPG. This includes a section on Police Shop Units and paragraph 2.5.12 seeks the provision of a number of such units within each borough, either within standalone units within key retail frontages or community buildings. Policy DM R1 and R4 should therefore be revised to accommodate the GLA SPG and MOPAC strategies. | No amendments to this policy are required. These policies are actually more flexible than that set out in the UDP (2003) and allow community uses in the main shopping frontages of town centres subject to criteria, in addition to community uses being permitted in the secondary shopping frontages subject to criteria and in the non-designated shopping frontages. Again, community uses are encouraged to locate in Merton's town centres and neighbourhood parades (which would technically include police shops) to Merton's town centres and neighbourhood parades. |
| DM R5 | Merton Priory Homes | We welcome the balanced approach taken by the Council in | Noted with thanks. |

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| | | this section | |
| DM R5 | Merton Council Director of public health | Food and drink - Fast food outlets will be supported under certain conditions, as long as there is not an over-concentration. | Noted - no amendments to the policy are required. |
| DM R6 | The Theatres Trust | <p>Again, we support this thorough and detailed document, especially for Policy DM R6, but still have an issue with 'sui generis'.</p> <p>Throughout the text, leisure and entertainment uses are designated as D2. Your two theatres are included in para.1.90 on page 35 under the sub heading of Protection of leisure and entertainment facilities and there is another section at para.1.109 on page 40 with a sub heading of Protection of arts, culture and tourism. But at no point is it explained that theatres are not D2, but sui generis – for clarity and accuracy this fact should be stated - probably in para.1.93 where community and cultural uses are designated D1!</p> <p>The new paragraph at 1.110 – 2nd line from the bottom – 'revert back' is tautology – revert should be used on its own</p> | The policy was amended in accordance with the suggestions. |
| DM R6 | Merton Priory Homes | We note and support the Councils 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. | Noted with thanks. |
| DM R6 | Wimbledon Society | This Policy is drafted in terms of regulation and, to some extent, encouragement, of cultural and arts activities. The Society considers that the Council should surely have far more pro-active policies, expressed either here, or in DM C1. There should be a positive Policy of developing the area between the Theatre and the Polka Theatre as a "Cultural Quarter". Specific projects the Council should play an active part in, include provision of a new performance space to | Not taken forward in this policy. As illustrated in Merton's Core Planning Strategy policy CS6 "Wimbledon" (c) and on the Wimbledon sub-area diagram, a cultural quarter is already recognised in the Local Plan at that end of The Broadway. The majority of this end of The Broadway area is located in the secondary shopping frontage where a wide range of uses |

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| | | replace the Civic Hall, which was demolished to make way for a shopping area in the 1980's: (see comments on site 01, page 334): and also: Development of the "Wimbledon Way" pedestrian route. This is seen as an Olympic legacy project of 2012 metres length, following the encouragement given to better pedestrian access to the AELTC for the Olympic tennis (see comments on 25TN on page 151). A range of public realm improvements have been proposed, and the first elements are already in place. The route is already shown on the Council's street plans, and runs between the Station and the AELTC. It could later be extended to the east to reach the Polka Theatre and to the west to the Common and the Windmill. | are encouraged therefore a new policy is not required. Similarly, the creation of a Civic Hall in Wimbledon town centre and Wimbledon Way do not require policies. The Wimbledon Way is a heritage walk in and around Wimbledon town centre set up to celebrate the Olympics. There is a plan for this project with initiatives set out. |
| DM R7 | Wimbledon Society | ADD a new policy at 1.114(c) "NEW MARKETS SHOULD BE SITED WITHIN A TOWN OR LOCAL CENTRE". | Not taken forward. This policy is for all markets in Merton regardless of their location. |
| DMR1 | Internal | Pg 14 - "Neighbouring" should read "neighbourhood". | Incorrect word for sentence. |
| DMR1 - R7 | Internal | Typos, Capital Letters and changes to '.' and ',' throughout the document. | Spelling and grammar. |
| DMR2 | Internal | 1) Formatting c) ii. Location of "And". 2) Para 1.27 refers to Appendix 6 - this should be replaced with Appendix F. 3) Para 1.28 delete the following from this sentence and 10 minutes walk (800 metres). | Updated policy. |
| DMR3 | Internal | 1) Para 1.39 - capital 'In'. 2) Paragraph 1.37 made changes to provide more clarity on the changes to the GDPO. 3) Inserted "when adopted" after "Design SPD". | Updated Policy. |
| DMR4 | Internal | 1) Paragraph 1.46 made changes to provide more clarity on the changes to the GDPO. | Updated Policy |
| DMR5 | Internal | 1) Paragraph 1.85 made changes to provide more clarity on the changes to the GDPO. 2) Insert the word 'Policy' before E3. | Updated Policy. |
| DMR6 | Internal | Minor text amendments. | "By recognising the value of arts, culture and tourism uses to Merton's economy and |

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| | | | employment, the council aims to protect and provide additional arts, culture and tourist and culture -uses in the borough". 2) To part F of the policy, to insert the following word in red: "f) Subject to Policy DMR3 , protecting, maintaining and encouraging the work-space needed to support creative and cultural industries across the borough". |
| DM H1 | Merton Priory Homes | 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. | Comment noted. |
| DM H1-H5 | Wimbledon Society | A general policy on Housing is surely needed (as none is provided in the Core Strategy), that will provide the context for the detailed policies. | Not taken forward. Merton's Core Planning Strategy provides three strategic policies on housing CS8 (housing choice), CS9 Housing provision) and CS10 (accommodation for Gypsies and travellers). It is our view that these provide extensive context for the detailed policies. |
| DM H2 | Merton Priory Homes | 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. | Comment noted. |
| DM H2 | English Heritage | Support for the policy. | Noted with thanks. |
| DM H2 | Wimbledon Society | The Society has noted that the Council has received a number of applications for the re-conversion to single dwellings of houses that have, in the past, been split into a number of flats. This is leading to the loss of useful housing units, at a time when there is a shortage of housing, and when policy dictates that London's population will continue to grow. The Council's response has been to say that they will keep a watch on the situation - presumably with a view to possible action in the | Merton's Core Planning Strategy CS.9 states " <i>we will... not support proposals that result in a net loss of residential units, or net loss of affordable housing units</i> ". The council recognises that some re-conversions have resulted in a loss of units and it may be that particular material considerations pertaining to these planning applications have overridden |

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| | | <p>future.</p> <p>In the Society's view the evidence of loss of housing is already clear, and the opportunity to develop a policy to deal with this situation should not be missed. The present Policy wording does not give intending developers a clear idea of what the Council expects, and an easier to understand approach should be produced. (see for example the table at 2.34). Paragraph 2.37 (gated communities) seems to have no place in a policy on Mix, and should be located elsewhere in the document, perhaps in a new general policy.</p> | <p>council policy on those occasions. The council will continue to monitor the situation.</p> |
| DM H3 | GLA | <p>The document's approach to affordable housing is not in general conformity with the London Plan and is not a basis for informing sites and policies on affordable housing. It is disappointing to see that the Council has not addressed the strategic issues raised by the GLA at the previous stage 3 consultation in respect to limiting average rent levels on the affordable rent product. As stated in our previous responses, setting rent caps on affordable rent (including re let conversions) at 65% of market rent could constrain delivery and prevent the maximisation of affordable housing delivery.</p> <p>14. The London Plan Revised Early Minor Alterations (REMA) and the revised London Housing Strategy emphasise that the priority for affordable housing is maximising supply and increasing delivery, having regard to the availability of resources. The Secretary of State's letter of 13 August 2013 which supports the publication of REMA also states that "imposing rent controls through local planning policies would inter this objective and risk letting Londoners down by limiting the supply of affordable housing, and reducing the choice for tenants." The nationally set definition of the affordable rent product as set out in the National Planning Policy Framework makes clear that affordable rent is up to 80% of market rent.</p> | <p>Agreed. After careful consideration the council is proposing to amend policy DM.H3 to bring it into general conformity with the Mayor's London Plan on this matter. We are proposing the following amendments to 2.42 <i>There is a wide variation in market rents in Merton. Homes with a rent of up to 80% of market rent could prove unaffordable to applicants in housing need, particularly those needing family-sized homes. In dealing with individual planning applications the council will have regard to a number of considerations including Merton's Housing Strategy , and Merton's Interim Policy Statement on Affordable Rent (07 November 2011) and the Council's Merton's draft Tenancy Strategy (November 2012). In accordance with Merton's Housing Strategy, the council will only support new housing schemes in Merton where average rent levels across all bed sizes do not exceed 65% of market rent, unless registered providers can demonstrate exceptional circumstances.</i></p> |

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| | | <p>15. Merton Council's Policy DM.H3 'Support for affordable housing' and justification text which seek to impose local, lower rent ceiling⁵ through the planning system would compromise the flexibility necessary for the product to deliver affordable housing in different circumstances and in turn will not be compliant with national guidance and would not be in general conformity with the London Plan (Policies 3.11 and 3.12). 16. Officers would welcome further discussion regarding this non-conformity issue with the Council prior to its Examination in Public.</p> | <p>Affordable rent levels for any bed size must not exceed 80% market rent or 65% for larger homes with three or more bedrooms. Affordable rent for all re-let conversions should not exceed 65% of market rent</p> |
| DM H3 | Merton Priory Homes | <p>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. Whilst we appreciate that affordability of larger family housing is an important issue we would caution against an absolute cap on all larger family housing at 65% as this might affect viability of schemes in areas where market rents are lower than average for the Borough.</p> | <p>The council are proposing the following amendments to 2.42 <i>There is a wide variation in market rents in Merton. Homes with a rent of up to 80% of market rent could prove unaffordable to applicants in housing need, particularly those needing family-sized homes. In dealing with individual planning applications the council will have regard to a number of considerations including Merton's Housing Strategy , and Merton's Interim Policy Statement on Affordable Rent (07 November 2011) and the Council's Merton's draft Tenancy Strategy (November 2012). In accordance with Merton's Housing Strategy, the council will only support new housing schemes in Merton where average rent levels across all bed sizes do not exceed 65% of market rent, unless registered providers can demonstrate exceptional circumstances. Affordable rent levels for any bed size must not exceed 80% market rent or 65% for larger homes with three or more bedrooms.</i></p> |

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| | | | <i>Affordable rent for all re-let conversions should not exceed 65% of market rent</i> |
| DM H4 | Internal | Amendments to text suggested. | Addition to sustainability appraisal section (in red) for clarification It is considered that there are no material social, environmental or economic benefits from the demolition of a structurally sound single dwelling and its replacement with another single dwelling. This policy meets a number of sustainability objectives including natural resources and climate change by helping to compensate for resources lost through demolition and rebuilding of single dwelling houses. |
| DM H4 | Wimbledon Society | <p>It has been the Government's intention that Code level 6 should apply from 2016, which is only a year or two after the Policies in this document will come into effect. This Policy should therefore recognise this and provide for an increase in the Council's required Code (5) level, when the Government introduce the higher figure. As this Policy applies only to total demolition, it is likely to be open to avoidance by developers, and additional criteria should be included. There have been several recent cases where demolition of a structurally sound house has been very extensive but not complete; where a small portion of the front facade is retained, ostensibly to protect the street scene. The result is a virtually new house but built to a lower Code level. To achieve the Council's aims on sustainability, the policy should apply to houses where the demolition is more than 50%, rather than total demolition.</p> <p>ADD: DMH4(d): "THE POLICY WILL BE APPLIED TO HOUSES WHERE MORE THAN HALF OF THE HOUSE IS TO BE DEMOLISHED".</p> <p>The same policy should also apply to the demolition of two</p> | <p>Agree with principle of this change. Proposed addition to the justification of DM. H4 (last paragraph) This policy will also apply in cases where a substantial amount, but not all, of the original single dwelling house is demolished and rebuilt as a single dwelling (for example, where the original façade is required to be retained). If the project is required to adhere to the part of building regulations relating to new build (as opposed to refurbishment), currently known as Building Regulations Part L approved document A (New Build) then the council would expect this policy to be applied.</p> |

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| | | semi-detached (or adjoining) houses, as to a single house. | |
| DM H5 | GLA | The borough should not restrict student housing provision to meet the needs of particular boroughs but should meet strategic needs as well as local ones in line with London Plan Policy 3.8 Housing Choice. It is therefore suggested that the reference to specific south London boroughs in paragraph (vii) be removed and replaced by “caters for recognised educational establishments within a reasonable travelling distance.” | The text was amended in accordance with the suggestion. |
| Housing - GnT | Merton Priory Homes | Support for the policy. | Noted with thanks. |
| Housing para 2.77 | Internal | pg 48, change "ad" to "as" | Spelling and grammar. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | In our view this is not a robust assessment of need and it does not provide sufficient evidence to support the policy statement in the Sites and Policies Plan. We are also concerned that the waiting list for pitches is not maintained effectively and further discourages Gypsies and Travellers from accessing pitches in Merton. None of the 6 residents who were identified as in need in 2011 were registered on the waiting list. | It remains the council's view that the research the council undertook is effective and robust. The council has undertaken primary research (the event hosted by the GandT group, assessment of and interviews with households on site) secondary research, (assessment of the Census and other available data) and co-ordination with neighbouring boroughs. The co-operation with other boroughs demonstrates that our findings are similar to others in south London (e.g. Wandsworth). Merton's GandT pitch waiting list can be applied for by informing the council or Merton Priory Homes that a person or household wants to be on the list; it is not mandatory to fill in a form in order to join the list in order to make it as straightforward as possible and not present barriers in terms of literacy levels or reluctance to provide information to authorities. Research responses are anonymous; the council does not use |

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| | | | responses provided in this way to offer council services. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | In particular, we object to the process of filtering down the responses so that in the final analysis only 6 out of 36 responses are taken into consideration. The filtering only includes responses from Travellers who provided verifiable bricks and mortar addresses in Merton. This excludes those not currently resident in Merton. Furthermore, from our experience in working with this community, Gypsies and Travellers are generally reluctant to provide such information to the authorities. This filtering process has excluded a significant number of Merton Travellers from the final analysis, as only 13 out of 19 responses were considered when assessing the level of need. | Disagree. On the advice of the local Gypsy and Traveller group that led on the organization of the event, we encouraged anyone to attend the event and we did not restrict attendance of the research event to our target population only (i.e. Gypsies and Travellers living in Merton). Therefore it is necessary to disaggregate the data to ensure that the requirements of people who do not identify themselves as Gypsies and Travellers and those who do not reside in the borough are separated from those of our target population (Gypsies and Travellers living in Merton). All 36 responses were considered in the analysis, the analysis found that 6 respondents from our target population had identified 'a lack of sites' as the reason for living in bricks and mortar housing. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | There is then further filtering based on an assumption that differentiates between 'cultural preference' to live on a site and 'actual need'. Although the majority of respondents (91%) rated living on a site as essential, important or very important, this was not considered when identifying the level of need. A question regarding the reasons for not living on a site was used to determine how many households would require living on sites. Only the responses of 6 Merton residents with verifiable addresses were taken into account. | It is common practice, and often advised by research experts that, questionnaire surveys adopt a funnel approach, where broad and general questions are asked at the beginning as a warm-up, before moving on to more specific questions. The question that asked respondent to rate living on site as essential, important or very important is a general one, which aimed to gather the respondents' opinion on the importance of site living for the Gypsy and Traveller community as a whole, rather than the specific requirement of that person or household that would inform pitch target |

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| | | | setting. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | As stated in our previous consultation response, the Sites and Policies Plan should seek to meet the need identified in the 2008 London GTANA of 4-16 pitches by 2017, by allocating sites for Gypsy and Traveller accommodation or integrating Gypsy and Traveller pitches on larger housing development sites. With regards to the emphasis on the needs of housed Gypsies and Travellers, we would point out that many Travellers in London have been forced into bricks and mortar against their will because of lack of adequate site provision and their needs should be included in any assessment of need. We therefore recommend that the maximum level of need identified in the London GTANA (16 additional pitches by 2017) is used as the baseline figure to inform the Site and Policies DPD. We agree that the accommodation needs assessment should be reviewed on a 5-year rolling basis after this backlog of need is met. | Not taken forward. The 2008 London GTNA is based on data from 2007. It is out of date. The methodology has been challenged by the Mayor of London, who has concluded that GTNA should be undertaken locally. Merton has undertaken more up-to-date, thorough, local assessment of the gypsy and traveller population in Merton, and co-ordinated with neighbouring boroughs. It is this up-to-date local assessment that has been used to inform Merton's Sites and Policies Plan. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | Finally, we would like to attend the Examination in Public hearing session regarding Gypsy and Traveller provision in order to present evidence on this issue and participate in the debate. | Noted. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | In our response to the previous consultation on the Merton Sites and Policies DPD we raised a number of concerns regarding the level of need identified in the Merton Gypsy and Traveller Accommodation Needs Assessment from 2011, the lack of a 5-year land supply for Gypsy and Traveller sites and the Duty to Cooperate with neighbouring Boroughs, the Gypsy and Traveller community and support organisations. In June 2013, the London Gypsy and Traveller Unit discussed these concerns at a meeting with Merton Planning Policy officers. The notes from the meeting together with our previous consultation response are attached to this submission as | Noted. It is the council's view that Merton's approach to accommodation provision for the gypsy and traveller community is a sound and positive strategy consistent with the requirements for government guidance on planning policy for traveller sites and extensive local evidence. |

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| | | <p>further evidence. Although this meeting clarified a number of issues raised in our previous consultation response, we are not convinced the approach taken by Merton Council regarding provision for the Gypsy and Traveller community is a sound and positive strategy consistent with the requirements of the Planning Policy for Traveller Sites.</p> | |
| <p>Position statement on gypsies and travellers</p> | <p>London Gypsy and Traveller Unit</p> | <p>We do not consider that Merton is in compliance with the Duty to Cooperate. Though Merton held discussions with neighbouring Boroughs through the sub-regional housing partnership, the Councils decided not to take a joint approach on the issue of Gypsies and Travellers. As a result, Merton has not shared with other Boroughs the data from their research concerning families in need who live outside of Merton and neither have other Boroughs shared data they may have collected concerning Merton residents. At our meeting with Merton officers on 12 June 2013, they agreed to seek a meeting of the Gypsy and Traveller sub-group of the sub-regional housing partnership. As of the date of this representation, no feedback has been provided on when or whether the Gypsy and Traveller sub-group will convene.</p> | <p>Disagree. The council has complied with the duty to cooperate. Merton Council has taken the lead in organising a Gypsy and Traveller needs assessment workshop for the seven London boroughs (Sutton, Richmond, Kingston-upon-Thames, Wandsworth, Croydon and Merton) to cooperate in assessing GandT needs sub-regionally, even though the Mayor is clear that this should be dealt with locally. The first workshop took place on 21 August 2012. Subsequent cross-borough engagement took place throughout Merton's plan-making, between planners and also between housing colleagues and land and property officers. The most recent meetings took place in August and September 2013. Each borough is at a different stage of local GandT needs assessment and plan making. In addition, the evidence presented from the boroughs that have carried out local assessments (such as Merton) does not show that GandT needs are uniformly characterised across south London boroughs. Therefore the boroughs have decided to continue to undertake local assessments and co-ordinate results. No evidence has been presented to any of the south London boroughs</p> |

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| | | | (particularly Wandsworth and Merton who are at a similar plan-making stage) that demonstrates that this approach is unsound. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | We would like to make the following comments on the Merton Submission Draft Sites and Policies Plan regarding the Position Statement on meeting the accommodation needs of Gypsies and Travellers in conformity with the Planning Policy for Traveller Sites. We hope that the format of our response and our consideration of the tests of soundness (which we do not feel are met) is appropriate. We could find no pro-forma, or guidance about regulations that need to be followed, on Merton's website and we would ask the Inspector to take this into account. | Noted. |
| Position statement on gypsies and travellers | London Gypsy and Traveller Unit | While the Position Statement on Gypsy and Traveller accommodation does not set pitch targets and assumes the need for 4 public pitches will be met though site turn-over, it recognises the need to identify land for 2 pitches to meet the need of Traveller households who are current bricks and mortar homeowners. However, the document does not make a site allocation for this purpose, on the grounds that no suitable sites have been identified in the assessment against PPTS and Merton Core Strategy criteria. This site appraisal has not been published on the Council's website as part of the evidence base and therefore we are not convinced this approach is sufficiently justified. We would wish to request for this information to be made public as part of the Examination of the Sites and Policies Plan. We are concerned that Merton has not made a site allocation because a) it holds the view that it is the responsibility of individual Gypsies and Travellers to bring forward sites and b) it considers Gypsy and Traveller needs are not a priority need because the group expressing the need is small in number. | Disagree. The council's Housing Strategy 2012-15 summarises Merton's housing needs and how these will be delivered. It clearly states that one of the council's priorities is to "Identify and meet housing and support needs of minority groups". The council has assessed all of the sites in the <i>sites and Policies Plan</i> against PPTS and Merton Core Strategy criteria and will publish this on Merton Council's website. |

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| DM C1 | Mayor's office for Policing | Alterations to this policy were sought seeking to allow the release of policing facilities where there would be no net loss in the overall service provision. Policy DM C1 b) i. allows the loss in these circumstances it also highlights that there should be no viable demand for other community uses on the site. However associated paragraph 3.8 requires marketing evidence although is specific to D1 Use Class Community Uses. | No changes proposed. London Plan policy 3.16 and Merton's Core Planning Strategy policy CS11 infrastructure support the retention of community facilities (D1 uses). The latter policy also supports the redevelopment of the police estate. |
| DM C1 | Sport England | Sport England supports this alternative option and indoor and outdoor sports facilities should have a specific section within this policy or a separate policy. | Not taken forward. The council considers that the existing policy framework adequately covers sporting scenarios (indoors and outdoors) and having separate policies for each is unnecessary. |
| DM C1 | Wimbledon Society | The protection of the facilities that exist should be paramount. Therefore the wording of Policy (b) SHOULD COME FIRST and BE STRENGTHENED. The Policy should start from the position that existing facilities should be retained, and any loss would be unusual and governed by strict criteria – see the wording at the end of para 3.4 of the justification. As currently written, the retention of existing facilities is inadequately protected. | Not taken forward. Merton's Core Planning Strategy policy CS11 states that community facilities should be retained, also supported by the London Plan policy 3.16. There is no need for duplication. |
| DM C1 | English Heritage | We raised concern in respect that Policy DM C1 Community facilities, did not appear to allow that other factors might mitigate against the suitability of the proposal and it may be appropriate that such development occurs in a different location. | No change proposed - the plan should be read as a whole. Design and heritage policies would apply to all development. |
| DM C1 | Wimbledon Society | An additional Policy is needed to meet the past undertakings by the Council 6 for a replacement of the Civic Hall in Wimbledon Town Centre. | Not taken forward. The council is not currently or seeking to provide a new public hall in Wimbledon town centre, in addition to the |

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| | | | existing two theatres. |
| DM C1 | Wimbledon Society | An additional Policy is required to reflect the emergence of the Wimbledon Way project. | No change proposed. A1.7/Transport proposal – Wimbledon Way – Signed route to Wimbledon Village along existing routes. – It is not necessary or possible to name each marked pedestrian route in the Local Plan. |
| DM C1 | Natural England | The Council may wish to make reference to Open/green Spaces under this section as community facilities also. | Not taken forward - considered unnecessary duplication. |
| DM C2 | Merton Priory Homes | 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. | Noted. |
| DM C2 | Wimbledon Society | For over 5's (policies (a) – (d)), the current shortage of school places emphasises the need for a clear and publicly available plan for provision of places. | Agree with principle of comment. The council has published several documents setting out the approach to planning for school places, including two studies on provision of primary and secondary school places. |
| DM C2 | Internal | For the avoidance of confusion, retain the erroneous paragraph reference number 'e)' in this policy. | This numbering error should only be corrected for the 'adoption' version of the document. |
| DM C2 | RESIDENTS' ASSOCIATION OF WEST WIMBLEDON English Heritage Wimbledon Society Barnes J Smith N Edwards T | WITHDRAW PARAGRAPH 3.22 | As the paragraph is not designed to directly relate to an existing scenario, is not fundamental to the Sites and Policies Plan's delivery, and is designed to introduce clarity rather than cause confusion and anxiety, it is recommended for removal. |
| DM C2 | English Heritage | Policy DMC2 Education, we are please to note the inclusion of paragraph 3.23 in respect of historic school buildings. | Noted with thanks |
| DM C2 | Wimbledon Society | Day Care for under 5's should have its own policy, utilizing (f) – (h). | Agreed - this is already in DM C2. Amendment to correct drafting error: criterion (e.) stated |

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| | | | <i>Children's Day Care Centres (0-4)</i> . It is now a heading. |
| DM E1 | Wimbledon Society | The PTAL maps that are referred to do not seem to be included. The previous UDP map (2/2003) was described as having unverified PTAL data. An up to date version is therefore needed. The previous rating for Raynes Park (at only PTAL 3, yet having a mainline station and several bus routes) should be checked. | Minor amendment proposed for clarity to paragraph 4.10, which explains what the PTAL maps are used for and how site proposals should use the most up to date PTAL information from Transport for London. |
| DM E1 | Wimbledon Society | This design point is welcomed, but should include a reference to local character. | No change proposed. 'Local distinctiveness' is already covered by the existing criterion ' <i>...appropriate to the site and its surroundings</i> ' |
| DM E1 | Wimbledon Society | The local amenity of residential property near employment sites also needs to be protected. | Agree with principle of change. Propose amendment to DM E1 e(iii) Should not adversely affect traffic movement or road safety or local amenity. Propose deletion of "should" as repeated word. It should also be noted that policies DM D1 Urban design and the public realm and D2 Design considerations in all developments would also form part of any assessment for employment development |
| DM E1 | Wimbledon Society | Policy aim: Should be amended to read "minimize the need to travel". i.e. OMITTING the reference to "BY CAR", as providing the opportunity for local people to get to their local workplace easily should be the aim, by whatever transport mode is available; congestion on buses and the rail system also needs to be addressed. | Agreed: amendment proposed to policy aim for DM E1 and DM E2 to read "To ensure that there is an adequate supply of suitable sites and premises in locations that <i>optimise maximise opportunities and co-locational advantages for businesses, minimise negative effects on other users and minimise the need to travel by car</i> " |
| DM E1 | Costco | General support, however, Costco objects to criteria a) of Policy DM E2 Costco also objects to the wording of criteria d) which sets out that proposals relating to employment sites will only be supported that 'provide research and development | Partial amendment proposed. The London Plan's Industrial Land and Transport SPG (2012) states that sui generis use cannot be applied as a general policy position, not least |

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| | | <p>(B1(b) Use Class), light industrial (B1(c) Use Class), general industrial (B2 Use Class) and storage and distribution (B8 Use Class) in Merton's Strategic Industrial Locations and Locally Significant Industrial Sites'. Warehouse clubs are a new and emerging sector of wholesaling and, in recognition, and in accordance with the National Planning Policy Framework, London Borough of Merton should recognise this emerging sector which is entirely appropriate on employment sites and the council should plan positively accordingly. Warehouse clubs are commonly found on industrial estates/employment sites and are an established and accepted use of employment allocated land. They generate employment, often at greater levels than BI, B2 and B8 uses and have characteristics that make them comparable with other industrial/employment uses. Indeed, Costco has been found to be appropriate for Strategic Industrial Locations, the highest level of employment land protection. Policy DM EI as currently drafted does not provide any flexibility for appropriate alternative employment generating uses. This is not considered to be consistent with the National Planning Policy Framework which highlights the need for flexibility within policy frameworks to ensure local authorities can respond to changing market circumstances.</p> | <p>because, by their nature, sui generis uses must be treated on their individual merits. This is stated in the justification of policy DM.E1 in paragraph 4.13. It is proposed to move paragraph 4.13 to below paragraph 4.4 and make minor amendments to reference the police estate In accordance with the Mayor's London Plan, sui generis use cannot be applied as a general policy position on designated employment sites, not least because by their nature, sui generis uses must be treated on their individual merits and considered on a site-by-site basis. the council does not consider that sui generis uses are generally suitable on designated employment sites. Sui generis use is a term given to the uses of land or buildings not falling into any of the use classes identified by the Use Classes Order. These uses include theatres, nightclubs, retail warehouse clubs, amusement arcades, launderettes, petrol filling stations, and motor car showrooms and parts of the police estate. Proposals for sui generis uses will be treated on their own individual merits and on a site-by-site basis.</p> |
| DM E1 | Mayor's office for Policing | <p>Representations to this Policy sought flexibility to allow for policing uses within the sui generis Use Class to be located within employment areas.</p> | <p>Partial amendment proposed. The London Plan's Industrial Land and Transport SPG (2012) states that sui generis use cannot be applied as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits. This is stated in the justification of policy DM.E1 in paragraph 4.13. It is proposed to move</p> |

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| | | | <p>paragraph 4.13 to below paragraph 4.4 and make minor amendments to reference the police estate "In accordance with the Mayor's London Plan, sui generis use cannot be applied as a general policy position on designated employment sites, not least because by their nature, sui generis uses must be treated on their individual merits and considered on a site-by-site basis. the council does not consider that sui generis uses are generally suitable on designated employment sites. Sui generis use is a term given to the uses of land or buildings not falling into any of the use classes identified by the Use Classes Order. These uses include theatres, nightclubs, retail warehouse clubs, amusement arcades, launderettes, petrol filling stations, and motor car showrooms and parts of the police estate. Proposals for sui generis uses will be treated on their own individual merits and on a site-by-site basis."</p> |
| DM E3 | Merton Priory Homes | Support for the policy. | Noted with thanks. |
| DM E3 | Astranta Asset Management | The criteria based approach to determining whether existing scattered employment sites should be re-worded to be more flexible. | Not taken forward. The marketing period is based on evidence and is very flexible as we do not require the unit to be vacant before its marketed and we do state in the marketing criteria that this is the marketing time period unless otherwise agreed with the council. |
| DM E4 | Merton Priory Homes | Support for the policy. | Noted with thanks. |
| DM E1- E4 | Internal | Spelling and grammar. | 1) Due to Inspectors recommendations at Camden, change 'maximise' to 'optimise' in relation to residential. 2) Typos, Capital Letters changes to '.' and ',' throughout the document. |

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| | | | 3) In Para 4.22's and 4.31 made changes to provide more clarity on the changes to the GDPO. |
| DM O1 | Wimbledon Society | DMO1: ADD: "...the development is for alternative OUTDOOR sports and recreation...". The London Plan specifically says this at para 7.56. Otherwise, open spaces can be lost to indoor sports and recreation buildings. DMO1 d(iv): ADD: "THE DEVELOPMENT IS FOR OUTDOOR SPORTS AND RECREATION". | Not taken forward. The wording in part b is from the NPPF and the phrase: "should not be built on" ensures that proposals for the erection or expansion of indoor sports facilities on open space would also need to be assessed against the criteria in policy DM O1. |
| DM O1 | Wimbledon Society | DMO1f: This policy is welcomed: ADD: "...BY REASON OF MASSING, siting, materials or design." This ensures that the bulk of nearby development does not have an adverse effect on the quality of the open space. | Not taken forward. 'Massing is only one of the elements of good design which is described more comprehensively in policy DM D2 (a) 'Design considerations in all developments'. In this sentence, the use of the word 'design' is deemed to be sufficient. |
| DM O1 | Wimbledon Society | DMO1g: To make clear that any partial loss of Open Spaces is covered by policy; ADD: "ANY LOSS OF PROTECTED OPEN SPACE WILL BE RESISTED UNLESS EQUIVALENT PROVISION IS MADE IN THE LOCAL CATCHMENT". See for example London Plan paragraph 7.56B. 5.3A: In order that the Council's policy is fully understood, the justification at 5.3 should be strengthened, as follows: ADD: "...guidance. THE STRONGEST PROTECTION WILL BE GIVEN TO MOL, WHICH HAS THE SAME LEVEL OF PROTECTION AS THE GREEN BELT. ANY DEVELOPMENT IN MOL SHOULD BE LIMITED TO SMALL SCALE STRUCTURES THAT SUPPORT OUTDOOR OPEN SPACE USES". The addition underpins the Council's basic policy point about protection, and makes clear that open spaces must not be regarded as cheap building sites for non-open space | The reference to the London Plan in part a and paragraph 5.3 is sufficient to clarify that policies 7.17 and 7.18 of the London Plan would be a material consideration for any development proposals on MOL and/or open space. The wording in Policy DM O1 (" <i>...existing designated open space should not be built on unless:...</i> ") is sufficiently clear to indicated that the policy tests would also be applicable for proposals that protrude onto a part of the open space. |

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| | | activities. The wording is specifically derived from the London Plan policy 7.17 and para 7.56. | |
| DM O1 | Internal | For the avoidance of confusion, retain the erroneous paragraph reference number 'c)' in this policy. | This numbering error should only be corrected for the 'adoption' version of the document. |
| DM O1 | Wimbledon Society | OPEN SPACES: 5.8: As written, this paragraph could allow the incursion of other uses into open spaces, which would be contrary to basic policy. This should be clarified therefore by: ADDING: line 2/3: "Where redevelopment (of pavilions etc) can provide for more than one OPEN SPACE COMPATIBLE use, the...." | Agreed. Insert 'open space compatible' before the word 'use' in the second sentence of paragraph 5.8. |
| DM O1 | Thames Water | Designate the Thames Water Sewage Pumping Station site at Byegrove Road, Colliers Wood as an existing Major Developed Site (MDS) in the MOL. | The Council agrees with Thames Water that the land should remain designated as MOL but disagrees with the part proposing that the site be designated as a Major Developed Site (MDS). The last bullet point of paragraph 89 in the NPPF would be a material consideration with any planning application on the subject site but in Annex 3 of the NPPF it is clarified that PPG2 has been replaced by the NPPF and it is evident that the NPPF does not incorporate the concept of 'Major Developed Sites' as described in Annex C of the former PPG2. Neither the NPPF nor the London Plan requires Merton Council to identify MDS's in MOL and Merton has no policies identifying or referring to MDS. |
| DM O1 | Natural England | This policy appears to have been strengthened in line with our previous comments and we therefore welcome the amendments. Natural England broadly supports this policy, but would like to see reference to creation of 'new open/green space' where appropriate, currently policy is passive. | Not taken forward. DM O1(e) actively supports the creation of new open spaces and further guidance is provided in paragraph 5.11. |
| DM O1 - O2 | Natural England | In respect of delivering on the Natural Environment policies | Not taken forward. The Mayor's All London |

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| | | <p>the Council may find that use of the existing natural signature of the borough can be used to help deliver this objective. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.</p> | <p>Green Grid supplementary planning guidance document (SPG) forms part of Merton's Development Plan and is a material consideration for planning applications in Merton. This SPG, which is referred to in paragraph 5.16 of policy DM O1, lists the natural signatures for the Wandle Valley and Arcadian Thames, the two Green Grid Areas relevant to Merton, respectively in tables 5.7 and 5.8. There is therefore no need to replicate this information here.</p> |
| DM O2 | Wimbledon Society | <p>REVISE 5.29 to read: "WHEN TREES ARE LOST IN A DEVELOPMENT SITE, THE COUNCIL WILL REQUIRE REPLACEMENTS THAT MATCH THE COMBINED AGE OF THOSE TREES THAT ARE LOST; ie A "TREE YEARS" POLICY. WHERE THE APPLICATION SITE IS NOT ABLE TO ACCOMMODATE ALL THE REPLACEMENTS, THE SURPLUS ARE TO BE PLANTED BY THE COUNCIL ON SUITABLE SITES IN THE LOCALITY".</p> <p>It is suggested that the issue of whether semi-mature or heavy nursery stock are used can then be left for decision in individual cases.</p> | <p>Not taken forward. Not every tree species is available at mature or semi-mature size. Tree nurseries can supply semi-mature trees for several species, a few species of which can be acquired at a very large size. However, whilst the immediate visual effect is great at a large size, there is an greater risk of the tree failing to take. Depending on the species required, smaller trees may be more appropriate to plant. The proposed trees policy provides enough flexibility to ensure provision of appropriate replacement trees.</p> |
| DM O2 | Natural England | <p>This policy also appears to have been strengthened in response to previous comments and the amendments are welcomed.</p> | <p>Noted with thanks.</p> |
| DM O2 | Wimbledon Society | <p>There should be an addition to policy (b) as follows: ADD: after DMO2b: " other landscape features of amenity value; AND MAINTAIN A SIGNIFICANT PORTION OF REAR GARDEN SPACE." 5.25: ADD a justification, using the points above. Paragraph</p> | <p>Not taken forward. No further amendments are required because these matters are adequately addressed in policy DM D2 part a and in Core Strategy policy CS 13 part e.</p> |

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| | | 6.32 could be noted. | |
| Rookwood Open Space (W007) | Dr PJ Hogarth Kaveh D Howell L Goodson J Wimbledon Society Mrs Newman Councillor Jeanes M J | I am writing with concern to the above site reference. At present the site is designated at green corridor/open land. I believe this to be an essential part of the Defra strategy for wildlife and strongly feel that the site should remain designated as such in the current review. It is an important site for local wildlife, and has been protected as such for over 100 years. It must remain so. | The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space. |
| DM D1 | Wimbledon Society | ADD: Additional policy after (b) which also relates to building and spaces: "THE RESPECTING OF LOCAL BUILDING LINES AND GAPS IN STREET ELEVATIONS, WHICH ARE THE PRINCIPAL ELEMENTS IN FORMING THE SCALE AND CHARACTER OF A LOCALITY". | Not taken forward. It is considered that existing criteria are sufficient. |
| DM D1 | Natural England | Support for the policy. | Noted with thanks. |
| DM D1 - D3 | English Heritage | The justification paragraphs for DM D1 (Urban design and Public realm), DM D2 (Design considerations in all developments), and DM D3 (Alterations and Extensions) make reference to Core Strategy Policy CS14 setting out the need for development to respect, reinforce and enhance local character. | Not taken forward. Reference to Core Planning Strategy policy CS14 is included at the start of all of the DM policies. It is our view that repeating specific elements of the CS policies throughout the DM policies is unnecessary; the Development Plan should be read as a whole (this is stated in the introduction) . Specific site proposals have reference to heritage assets and other significant design considerations where this is relevant. |
| DM D1 - D6 | Merton Priory Homes | Support for policy. | Noted. |
| DM D1 - D7 | Natural England | Support for policy. | Noted with thanks. |
| DM D1 - D7 | Wimbledon Society | The ordering of this important Chapter would be improved by; (a) putting the present DMD2 FIRST (as was the case in the earlier draft), as this has the principal design parameters spelled out, and (b) having a SEPARATE POLICY FOR BASEMENT WORKS rather than adding it to the Design policy: as can be seen, it is | Not taken forward. Chapter re-ordered to place "urban design and the public realm (DM.D1)" first, thus setting the wider context, then followed by "design considerations in all development (DM.D2) which relates to specific sites. DM.D2 (b) on basements can stand as |

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| | | very extensive, and rather dominates the rest of DMD2. | part of DM.D2 <i>Design considerations in all developments</i> or on its own |
| DM D1, D2, E2 | English Heritage | We recommended that Polices DM E2, D1 and D2 would benefit from a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised. Such a policy is included in policy D2 in respect of basements (DM D2 (b)) but not in Policy DM D2 (a) in respect of design considerations for all developments. | Not taken forward. The part of the policy relating to basements (DM. D2 (b)(ii) is a criterion stating “ <i>not harm heritage assets</i> ”. DM. D2 (a)(i) states developments must “ <i>relate positively to... historic context</i> ” Core Planning Strategy CS 14 (a) states that we will achieve this [enhance character and sense of place] by “ <i>conserving and enhancing Merton’s heritage assets...</i> ” London Plan (2011) policy 7.8 <i>eritage assets and archaeology</i> also states (criterion C) that “ <i>development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate</i> “ In our view, the wording in all of these policies is sufficiently positive regarding the protection of heritage assets not to have to re-iterate protection. Regarding E2 - No amendments proposed. Amendments made to design policies instead (to which all developments would reference). |
| DM D2 | Pizzuto Adrian | I recently viewed the planning policy document on the merton council website, i noticed in section 6.19 Lighting, there was no mention of attempts to reduce light pollution by street lights. Are there any plans to reduce the level of wasted light and therefore tax payer money by properly shielding or directing light or any other method so that it falls only where it is needed rather than into the sky, or peoples homes? | Noted. The council is currently investing in its street lighting to reduce energy use and light pollution. For planning policy, there are references are made to reducing light pollution in both the policy (DM D2) and section 6.19. |
| DM D2 | Natural England | The references to biodiversity and landscaping under paragraphs 6.20 and 6.21 are welcomed. | Noted with thanks. |
| DM D2 | Wimbledon Society | Generally: This should be RE-POSITIONED to be the first of | Not taken forward. In our view the current order |

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| | | <p>the Design Policies. Consideration should be given to placing the detailed policies from (a)i-ix under separate sub-headings, for example: Urban form and local distinctiveness, Neighbour Protection, Safety and access, Quality of the new work, Construction issues. This would then emphasise that, in planning terms, the design process has to start with the location, then neighbour protection, and only later go to considering the actual building. Too often, applicants start with the building and only later try to “fit it in” to the locality: and neighbouring property interests are often ignored until too late.</p> | <p>delivers what the representor proposes. The chapter was originally re-ordered to place "urban design and the public realm (DM.D1)" first, thus setting the wider context, then followed by "design considerations in all development (DM.D2) which relates to specific sites.</p> |
| DM D2 | Wimbledon Society | <p>DMD2(a) on page 94 ADD: “THE COUNCIL WISHES TO SUPPORT AND ENCOURAGE INNOVATIVE MODERN DESIGN THAT UNDERSTANDS LOCAL DISTINCTIVENESS, RATHER THAN A PASTICHE APPROACH”. Development that superficially harks back to supposedly earlier “styles” should have no place, and contributes little to either present or future generations. It also fails to realise the potential opportunities that modern technology can bring. This should be the FIRST policy (a), with the present (a) becoming (b).</p> | <p>Not taken forward. The council’s view is that the current criteria, for example DM.D2(a) (i) and (ii) allows for flexibility in building styles. This also complements the extensive explanation of high quality urban design and local distinctiveness given as part of the justification for Core Planning Strategy CS.14 (especially paragraphs 22.9 to 22.12)</p> |
| DM D2 | Wimbledon Society | <p>DMD2(ix) ADD: “ Ensure that trees and other landscape features are protected BOTH DURING CONSTRUCTION, AND WHEN DEVELOPMENT IS COMPLETED. ANY REPLACEMENTS SHOULD BE ACHIEVED VIA THE “TREE YEARS” APPROACH”. (See comment on 5.29 above). The construction phase, although short in the life of the new</p> | <p>Not taken forward. Not every tree species is available at mature or semi-mature size. Tree nurseries can supply semi-mature trees for several species, a few species of which can be acquired at a very large size. However, whilst the immediate visual effect is great at a large size, there is a greater risk of the tree failing to take. Depending on the species required,</p> |

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| | | building, is often very destructive of trees etc. | smaller trees may be more appropriate to plant. The proposed trees provides enough flexibility to ensure provision of appropriate replacement trees. |
| DM D2 | Wimbledon Society | <p>DMD2b BASEMENTS: on page 95 There is significant interest in having a policy on Basements, and this new approach in response to earlier consultation is welcomed. The range of Policies set out in DMD2 are rather unbalanced by the Basement addition, and therefore it is suggested that: THE SECTION ON BASEMENTS SHOULD HAVE ITS OWN DMD POLICY. ADD NEW POLICY at (b)(x) "WHERE PRACTIBLE, BE SET WELL BACK FROM PROPERTY BOUNDARIES". It appears that there is significant disquiet when basement works abut the property of neighbours. Whilst the Party Wall Act legislation is then usually utilised, the inherent difficulty of placing "stiff" modern construction under or beside "flexible" foundations of earlier buildings can still cause problems. Achieving some horizontal distance between foundations appears to be one way of lessening this issue.</p> <p>ADD NEW POLICY (d): "BASEMENTS CONTAINING HABITABLE ROOMS IN FLOOD PRONE ZONES WILL NOT BE ACCEPTED". See the Council's similar policy DMF1 para 8.16 page 127.</p> <p>DMD2 6.15 onwards: on page 96 ADD a paragraph at 6.16: The justification for the preceding Policy (a)v on sunlight and daylight etc (which is welcomed) needs to be clearly spelled out.</p> <p>It should come before the other paragraphs, as it should shape the whole design, and is currently very poorly understood by applicants.</p> <p>HEADING: "NEIGHBOUR PROTECTION"</p> <p>6.16 NEW TEXT: "NEW DEVELOPMENT MUST RESPECT</p> | The council considers that the existing policies appropriately deal with the matters raised. |

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| | | <p>THE DAYLIGHTING, SUNLIGHTING AND PRIVACY OF ADJOINING PROPERTIES INCLUDING GARDENS. DETAILED GUIDANCE WILL BE CONTAINED IN MERTON'S DESIGN SPD". The section on "High Quality Design" at 6.16 then becomes 6.17.</p> <p>DMD2 on page 98 para: 6.30 ADD AT END: " demonstrate that the integrity of the listed OR UNLISTED building will be unaffected". Locally Listed buildings are classed as Heritage Assets, and need basement control.</p> | |
| DM D2 (a) new | Wimbledon Society | DMD2a(xiv) DESIGN on page 94 ADD: "ENSURE THAT THE APPROPRIATE CODE/BREEAM LEVELS ARE ACHIEVED BY INCORPORATING THESE AS INTEGRAL PARTS OF THE OVERALL DESIGN, RATHER THAN AS ADD-ONS". | Agreed. The text was amended in accordance with the suggestion. |
| DM D2(a)(x) | Wimbledon Society | DMD2(a)(x) DESIGN on page 94 ADD: "...that landscaping forms an integral part of any new development where appropriate, AND THAT AT LEAST HALF OF THE REAR GARDEN SPACE IS RETAINED UNBUILT". (see for example para 6.32 and comments at DMO2). This would ensure that a significant amount of potentially green land could be maintained, for biodiversity corridors, water husbandry and run off control, amenity when viewed from neighbouring properties, and children's outdoor activities. | Not taken forward. While the council supports any measures householders take that will help to enhance biodiversity, provide playspace, improve runoff and visual impact, permitted development rights mean that householders can manage their rear gardens (e.g. paving the surface) outside the planning process. In addition, requiring half a rear garden to remain unbuilt is arbitrary, inflexible and has not been subject to assessment across the different characteristics of the borough. |
| DM D3 | Wimbledon Society | <p>DMD3a Alterations and Extensions on page 100</p> <p>The emphasis of this policy as drafted is on the detailed design of the alteration, where instead it should be to respect firstly the prevailing street forms and local distinctiveness, and then the amenity of adjoining gardens and properties. Only when these design parameters have been understood should the detailed design of the extension be produced. Also, it is clear that there are many examples of rear</p> | <p>1. It is acknowledged that alterations do not have to copy all aspects of the building to be considered high quality design. High quality design can be achieved in other ways and not necessarily by replicating existing built form. The policy will be amended in accordance with the suggestion.</p> |

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| | | <p>extensions that are of high design quality, respect neighbours etc, but do not adopt the architectural idiom of the host building. The desirability of “keeping in keeping” in such situations needs to be questioned, and in some cases is not of any consequence.</p> <p>The ordering of the Council’s policy headings should therefore be amended as follows, to put the important elements first. (a) New subtitle: “LOCAL AREA CONTEXT:” (respect street gaps as set out in (iv), wider setting “ (v), roof forms (ix), roof materials “ (vii), materials “ (v), (b) New Subtitle: “NEIGHBOURLINESS” (or respect for adjoining property):ADD NEW POLICY: “ENSURE PROVISION OF APPROPRIATE LEVELS OF DAYLIGHTING, SUNLIGHT, PRIVACY TO ADJOINING BUILDINGS AND GARDENS”. (similar to para 6.18)</p> <p>ADD NEW POLICY: “THE PRESENCE OF TREES ETC SHOULD NOT BE USED TO ACHIEVE PRIVACY, AS THEY ARE BY THEIR NATURE IMPERMANENT”.</p> <p>A new Policy here is essential to guide applicants. Unless an extension is designed from the outset to respect the legitimate expectations of neighbours on these issues, difficulties and delays and objections will be the result. (noise and disturbance as set out in (vi), dormers as set out in (viii)) (c) New subtitle: “THE PROPOSED STRUCTURE” (Form and bulk of the original as set out in (ii), Detailing as set put in (i))</p> | <ol style="list-style-type: none"> 2. Regarding the ordering of the headings, the introduction states that the order of the policies is not important. All policies in the plan should be read as a whole and are not in a priority order unless explicitly stated. 3. Not taken forward. Planting including trees are not used as a substitute for privacy but can be used to enhance privacy. 4. The policy will be left verbatim. Not taken forward as it is unclear what it would achieve. |
| DM D4 | Bellamy J | (p89)Historic Interest of the Above Area: however the 'formal 'Listing' of the canons landscape (the house itself already being listed) is long overdue. The fine lake, walled garden, lawns, shrubberies, specimen trees and the yew walk suely | Noted. It should be noted that Canons House is listed, therefore the surrounding area, including the boundaries and open garden, are protected as the setting of a listed building |

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| | | merit recognition. As in many other respects, the historic landscape of Mitcham is under-valued at present. The gardens contain olive trees - surely these are 'special case' trees as mentioned on Page 89, S. 30? (The lake-overlooked by a listed dovecot-is believed to have originated as a monastic stew pond.) Changes: the western extremity of Lower Green West should continue to be shown as an integral part of Fair Green, not as an irrelevant fragment? | |
| DM D4 | Bellamy J | Heritage Asset: at the same time as the progression of Local Listing for the War Memorial on lower Green West, Council officers considered (by local request) the need to recognise the location in the Mitcham Parish Churchyard of a distinguished 'Cross of Sacrifice ' War Memorial, together with the associated Commonwealth War Graves Commission gravestones. As a result of this action, the- memorial and stones are also recognised for local listing. Again, as a result 6T local pressure, both Figges Marsh and London Road Playing Fields are in the process of being designated as Queen Elizabeth II Playing Fields, and hence as items of heritage conservation. | Yes, the structures in Mitcham Parish Churchyard are progressing towards local listing. Figges Marsh and London Road Playing Fields are being considered for designation as Queen Elizabeth II playing fields, however this will not make them heritage assets. |
| DM D4 | Wimbledon Society | DMD4 MANAGING HERITAGE ASSETS on page 102 As is the case with the Extensions policy above, the sub headings in this policy should be re-ordered: policies for works to an individual building need a different approach from policies that deal with whole areas. It is suggested therefore: the first policy should cover the actual buildings: So items c,d,f: The second should cover Conservation Areas and the Setting: So item b: | Not taken forward. The council has clearly set out what is covered by the term "heritage asset" (para 6.49). To avoid duplication, the policy covers all heritage assets. |
| DM D4 | Wimbledon Society | Thirdly a NEW POLICY is needed to cover Archaeology and Scheduled Ancient Monuments: ADD: "WITHIN THE DEFINED ARCHAEOLOGICAL ZONES, PROPOSALS WILL | Not taken forward. DM D4(b) and (c) set out the steps that need to be undertaken when undertaking work in relation to heritage assets, |

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| | | NEED TO DEMONSTRATE THAT A DESK-TOP STUDY HAS BEEN EVALUATED. ARCHAEOLOGICAL CONDITIONS WILL BE APPLIED WHERE ACCESS AND/OR SITE EVALUATION ARE DEEMED NECESSARY” Justification: “The Council considers that archaeological remains are fragile, and should generally be preserved in situ, with new development designed around them: their future exploration and evaluation will then remain possible”. | including the defined APZs. Paragraph 6.50-6.52 clearly set out the way forward with respect to APZs |
| DM D4 | Wimbledon Society | Para: 6.49: Which lists Heritage Assets: on page 103 ADD at the end of the list “SCHEDULES OF LISTED AND LOCALLY LISTED BUILDINGS, CONSERVATION AREAS AND SCHEDULED ANCIENT MONUMENTS ARE SET OUT IN THE ACCOMPANYING APPENDIX”. It is important that Locally Listed Buildings are also included, as they are clearly Heritage Assets, and specifically covered by Policies. (The typo “it’s” in (b) and (ci) needs correction). | Policy Amendment Not taken forward. DM D4 Paragraph 6.55 states that the details of heritage assets are available on Merton Council’s website. Typos corrected |
| DM D5 | Wimbledon Society | DMD5 ADVERTISEMENTS on page 106 It should be made clear that the Signage required on individual shopfronts etc (which are very necessary for the identification of premises) are dealt with in DMD7. This policy therefore deals with Advertisements for products/events, which generally do not need to be located in relation to specific businesses. | Agree that document improved by referencing. Propose adding reference to DM.D5 Advertisements and DM.D7 Shopfront design and signage "Links to Core Planning Strategy policy CS.14 Design; for shopfronts, see also policy DM D7 Shopfront design and signage " |
| DM D5 | Wimbledon Society | DMD5 ADVERTISEMENTS on page 106 Suggest that after the general Policy, “Express consent etc... .” which could now be Policy (a): ADD: Policy (b): “ADVERTISING PANELS SHOULD BE SITED SO AS NOT TO AFFECT THE SETTING OF HISTORIC ASSETS OR VALUED TOWNSCAPE, AND | Not taken forward. DM.D5 already states " <i>Express consent will only be granted for advertisements where they do not harm the character of an area, amenity or public safety</i> " adding the proposed policy would duplicate unnecessarily. |

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| | | ALLOW THE FREE MOVEMENT OF PEDESTRIANS”. | |
| DM D6 | Wimbledon Society | DMD6 TELECOMMUNICATIONS on page 108 Suggest that after the general policy, which could be policy (a): ADD: policy (b): “EQUIPMENT SHOULD BE SITED SO AS NOT TO AFFECT THE SETTING OF HISTORIC ASSETS OR VALUED TOWNSCAPE OR LANDSCAPE”. ADD: policy (c): “EQUIPMENT FITTED TO BUILDINGS SHOULD BE POSITIONED AS UNOBTRUSIVELY AS POSSIBLE, AND NOT SEEN AGAINST THE SKYLINE”. | Partially agreed. |
| DM D7 | Wimbledon Society | DMD7 SHOPFRONT DESIGN and SIGNAGE on page 109 It is good that the design of the shopfront, the structure that forms the front face of the shop, and the signage on the fascia above, should each have their own policy. A new shopfront will need planning permission, the sign will usually need advertisement consent. Policy (a) already covers the design of the shopfront. The signage needs to have additional policy input, as follows: ADD: after (b)iii: (b) iv: “INTERNAL ILLUMINATION OF THE SHOP FASCIA OR LETTERING WILL NOT BE APPROPRIATE FOR LISTED BUILDINGS AND OTHER HERITAGE ASSETS, NOR IN CONSERVATION AREAS”. ADD: after (b) iv: (b) v: “EXTERNAL ILLUMINATION OF THE LETTERING WILL NOT BE APPROPRIATE FOR LISTED BUILDINGS”. | Not taken forward. The policy (part b) already sets out criteria to ensure that the design and means of illumination will enhance the street scene. There are ways that shop fronts can be illuminated sensitively in conservation areas and for listed buildings that do this. |
| DM EP1 | Wimbledon Society | ADD: to Map 7.1: AN ADDITIONAL AREA BASED ON THE WIMBLEDON TOWN CENTRE. As background, see the Commons Energy and Climate Change Committee report of 8/8/2013, which recommended “financial aid to support medium size renewable energy generating systems”. Should such financial support become available in some form, as seems likely, then the Council needs to be in a position to put | Agreed. Figure 7.1 updated to be the same as was consulted on at Stage 3 which included the most recent copy of the decentralised energy opportunity areas map. The Wimbledon Town Centre CHP opportunity area was added to Figure 7.1 in stage 3 of the consultation. It was accidentally replaced by an early version of the |

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| | | forward proposals for suitable funding. | map for stage 4 of the consultation. This has been corrected by reverting back to the map used in stage 3 of consultation. |
| DM EP1 | Wimbledon Society | DMEP1 Decentralised Energy Networks on page 111 The encouragement for the setting up of such networks is welcomed, as it could lead to a reduction in fuel importation into the Borough, and potentially deliver more economical energy to developments in town centres. Future development schemes should be expected to demonstrate that their heating and cooling systems are capable of being adapted and connected into a future DE network, if this becomes available. The Council should not only identify suitable areas, it should promote them. Wimbledon, Merton's largest single town centre, with a significant number of big developments both existing and future, and capable of forming into a town-wide energy network scheme, is unaccountably omitted from the map, and should be added. The existing BID status could provide an aid in the setting up of a scheme. ADD: to Policy: "The Council will identify AND PROMOTE areas of greatest opportunity for the development of decentralised energy networks " | Agree with change. Amend policy to read " The council will identify and promote areas of the greatest opportunity for the development of decentralised energy networks (see Figure 7.1). |
| DM EP2 | Internal | DM EP2 Reducing and mitigating against noise | Remove unnecessary word. |
| DM EP2 | Wimbledon Society | DMEP2 Noise on page 114 ADD: to Policy: " have significant effect on existing and future occupiers AND NEIGHBOURS, or the local amenity ADD: to Policy after (iv): (v) THAT NOISE FROM THE CONSTRUCTION PROCESS DURING DEVELOPMENT IS CONTROLLED". ADD: to para 7.14: " examples of noise-sensitive land uses are hospitals, housing, schools AND OPEN SPACES". | Add to justification para 7.12 - ' Noise from construction during building of developments will be managed through use of planning conditions '. |

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| | | As an example, the wide area of the Common is susceptible to significant traffic noise, principally from the A3, which is partly in the RB of Kingston, but skirts the Borough boundary. | |
| DM EP3 | Wimbledon Society | DMEP3 Allowable Solutions on page 117 The Society is unable to comment on the merits or otherwise of this type of scheme at this time. There appears to be a danger that, by making suitable payments, new developments could be able to avoid meeting Code/BREEAM targets. | Noted. |
| DM EP3 | LoveWimbledon (Stage 2) | Para 7.22 amend ", an essential part of every home" to "essential energy uses within buildings". | Para 7.22 amend ", an essential part of every home" to " <i>essential energy uses within buildings</i> ". |
| DM EP3 | LoveWimbledon (Stage 2) | Para 7.22. From 2016 <i>In the future</i> , new developments will be required to reduce 100% of regulated emissions (for example, electricity/gas used in heating, cooking and lighting, an essential part of every home <i>essential energy uses within buildings</i>). There will be three ways in which developments can reduce emissions: | Agreed. Para 7.22. From 2016 <i>In the future</i> , new developments will be required to reduce 100% of regulated emissions (for example, electricity/gas used in heating, cooking and lighting, an essential part of every home <i>essential energy uses within buildings</i>). |
| DM EP4 | Wimbledon Society | DMEP4 Pollutants on page 119 ADD: to Para 7.30: "... Therefore development that may result in an adverse impact to local air quality, INCLUDING DURING CONSTRUCTION, may require...." | Agreed amendment to Para 7.30: "... Therefore development that may result in an adverse impact to local air quality, <i>including during construction</i> , may require...." |
| DM EP1-EP4 | Merton Priory Homes | MPH is supportive in principle 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 | Noted. The council does not propose to enforce decentralised energy regardless of quality, rather it wishes to support the development of high quality CHP networks that deliver both environmental and economic benefits to the development which they serve. Issues of quality and feasibility should be picked up during development and design stages. The purpose of this policy is to ensure that decentralised energy are carefully considered during the design rather than making them a |

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| | | 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. | mandatory part of the design. |
| DM F1 | Environment Agency | Although we supported the comments inserted on page 124 in regard to Policy DM F1 in our previous representation, the comments have been inserted in the wrong column which may cause some confusion because it would appear to suggest that 'More Vulnerable' development can be permitted in Flood Zone 3b if it supports London Borough of Merton's wider objectives and can be shown to result in an overall reduction in flood risk. Whilst this may be appropriate in largely developed areas like Merton, there has been no precedent for this approach elsewhere and it's contrary to the National Planning Policy Framework, which restricts Flood Zone 3b to Essential Infrastructure/Water Compatible development only. To avoid any confusion and setting a precedent for development within the functional floodplain, the comments would only fit on Flood Zone 3a column not Flood Zone 3b column which is the functional flood plain. | LBM has written to the EA for clarity on this response as it contradicts stage 3 comments |
| DM F1 | Wimbledon Society | The proposed Polices permit development where flooding is expected to happen, and this is regarded are unacceptable. It does not seem sensible that vulnerable development should be built in any areas that are liable to a flooding risk, and THE POLICIES SHOULD BE RADICALLY CHANGED TO REFLECT THIS. Additionally, there should be an additional policy for the protection of existing vulnerable uses, particularly housing, that now lie in flood-prone zones. ADD: after (a)v: (a)vi: (The Council will) "SUPPORT ALLEVIATION MEASURES THAT WILL REDUCE THE RISK OF FLOODING TO EXISTING VULNERABLE USES, PARTICULARLY HOUSING". | Not taken forward. Merton's Core Planning Strategy policy CS16 Flood Risk Management states " <i>We will (a) work with the Environment Agency, landowners and developers based on findings of the most recent Strategic Flood Risk Assessment and other plans to manage and reduce flood risk from all sources of flooding</i> " This would include alleviation measures to existing properties. The table in policy DM F1 already mentions specifically how basement developments should be managed in flood risk zones 2,3a and 3b. |

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| | | ADD: after (a) vi: (a)vii: (The Council will) “NOT ACCEPT BASEMENT SCHEMES WHICH INCLUDE HABITABLE ROOMS”. (This follows the wording in para 8.16) | |
| DM F1 | Thames Water Environment Agency | Support for the policy. | Noted with thanks. |
| DM F2 | Thames Water English Heritage Natural England | Support for the policy. | Noted with thanks. |
| 04 TN | Nicholson JD Mallon M | Site and Location: Delete "Chelsea - Hackney Line" and insert "Crossrail 2 Wimbledon to Tottenham Hale". Proposed use: delete "using District Line Track (on route of District Line) to Parsons Green" | Agreed. Transport for London recently undertook a major public consultation to obtain people's views towards two alternative route options, a metro-style. High frequency underground option and a regional option with strong connections to the south western main line routes and the north-east, both options would link to Wimbledon Station. The consultation is now complete and TfL/Network Rail will be compiling the results over the coming weeks. However early feedback suggests strong support for the regional option. The chosen route will form the basis of a new safeguarding consultation in 2014. The council have been advised by TfL that the existing safeguarding must be retained until new route alignments are become available. However, understanding may be helped by minor text changes - page 149, 04TN change site and Location to "Crossrail 2 (formerly Chelsea Hackney Line). Change proposed use.....and access improvements. "Proposal being reviewed by TfL and Network rail. New |

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| | | | safeguarding expected 2014, include significant alignment changes". |
| 05 TN | Nicholson JD | Site and Location: delete "adjoining District Line". Proposed use: delete " Chelsea - Hackney Line". Ps: Chelsea - Hackney proposal has been abandoned. | Agreed. See above. |
| 06 TN | Sutton Council | The London Borough of Sutton is extremely pleased to see that the proposed Tramlink routes within your borough have been safeguarded on the Draft Policies Map (Draft Policy 06TN). As you are aware, the London Borough of Sutton is very keen for two extensions to be constructed: Sutton Rosehill Morden Wimbledon; and Sutton Rosehill Mitcham Junction (Croydon). We have already safeguarded these routes within our planning framework and it is heartening that our safeguarding and your safeguarding dovetail. We are also grateful for the support that the London Borough of Merton has given the London Borough of Sutton in meetings with Transport for London. However, on a point of consistency, it may be helpful to name the safeguarding consistently. We note: On Page 150 the safeguarding is referred to as "Tram Line Extension" and "Tram Service". On Page 279 the safeguarding is referred to as "Light Rail Policies" | Agree with improvements for clarity Reference to link rail changed to tram - pages 218, 244, 282, 308 and 328 legend delete reference to "Light Rail" replaced with "Tram Extension" |
| 12 TN | Wimbledon Society | Wimbledon Town Centre Public Realm improvements: ADD: " and pedestrian environment, WITH ADDITIONAL PEDESTRIAN ENTRANCES TO THE ENLARGED STATION, FROM ALEXANDRA AND QUEEN'S ROADS: ENHANCEMENT OF THE WIMBLEDON WAY PEDESTRIAN SPINE ROUTE, WITH SEMI-PEDESTRIANISATION AND THE.....removal of the one way system." This is to make the Station more accessible from the local area, and avoid the need for all passengers to use the single | Partially agreed. Transport Proposals A.1.4 Proposal number 12TN – Reference to Improved station access arrangement included as internal station capacity improvements are likely to come forward during lifetime of plan and these could be supported by wider access improvements. Walking improvements such as Wimbledon Way are already covered by the broader Proposed Use description. The exclusion of a particular scheme or aspiration |

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| | | <p>existing entrance to what will become an even more important and busy rail interchange.</p> <p>And to continue the earlier initiatives by the Council and others to the creation of a special pedestrian spine route through the town centre, which is already shown on the Council's street signage maps.</p> | <p>within the description does not preclude additional proposals coming forward. Minor text change 12 TN insert "...pedestrian environment", improved station access arrangements". Proposed Atkinson Morley Hospital site shared cycle route added.</p> |
| 15 TN | Sutton Council | Support for the proposal. | Noted with thanks. |
| 24 TN | Wimbledon Society | <p>Fully support the proposal for an additional pedestrian/cycle link to Earlsfield Station. Also pages 358 and 361.</p> <p>A1 .7 page 151: Pedestrian/cycle routes: The "Wimbledon Way" should be shown:</p> <p>ADD: 25TN: Wimbledon Town Centre and Village: "NEW WALKING ROUTE 'THE WIMBLEDON WAY' EXTENDING FROM THE POLKA THEATRE TO THE COMMON AND THE ALL ENGLAND TENNIS GROUNDS, VIA THE STATION".</p> <p>This route is already shown on the Council's street signage maps</p> | <p>No change proposed. A1.7/Transport proposal – Wimbledon Way – Signed route to Wimbledon Village – It is not necessary or possible to include every way marked pedestrian route. Scale of route does not merit separate designation.</p> |
| DM T1 | Bellamy J | <p>p132 the text advocates the enhancement for shared use of walking and cycling routes. This appears to ignore the fact that various statutory rights of way in the Borough, (such as Church Path and Cold Blows) are designated Public Footpaths, with a width appropriate to this use, (not Public Bridleways, a higher form of designation incorporating more generous dimension). Moreover, these footpaths are of great antiquity and are cherished as heritage items. To allocate them for cycle traffic (without the detailed study which would have been inherent in applications to raise their designation to that of Public Bridleway) would risk inherent incompatibility between pedestrians and cycle traffic, to the detriment of people on foot. Various incidents in this locality have</p> | <p>Partially agree. The development of cycle facilities including shared facilities would be subject to a detailed design process, which would review any potential safety or legal impacts that might arise. They would also be subject to a public consultation/legal process where legal advice requires any change to their designation. For clarity propose amendment to Description on <i>Transport proposal 22TN - Borough wide cycle facilities</i> revised to include reference to safety issues also refer to general comment. Add to end of text Colliers Wood and Morden "(subject to safety reviews)."</p> |

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| | | illustrated an unwillingness by cyclists to show due care for the safety of pedestrians, (Reference also Site Map, 246; Policies: Map Mitcham C3. Any major attempt at widening of such routes would be at the expense of hedgerows and local character The suggestion that a conventional public path carrying pedestrians across Lower Green West should be opened to cyclists would detract from pedestrian safety. | |
| DM T1 | GLA | In Chapter 9, Transport, Policy, point A, the 'Community Plan Infrastructure Levy' is mentioned. It is assumed that this is referring to the Community Infrastructure Levy, however, this should be clarified. | Community Plan Infrastructure Levy, |
| DM T1-T2 | Natural England | Natural England is supportive of sustainable transport options and encourages the links between this Policy and those of provision of green chains/links/corridors (Policies DM 01 and DM 02), together with increasing access to open/green spaces and nature where possible and appropriate (paragraph 9.4). | Agree to strengthen references Page 133 - para 9.4 insert after open space "as well as opening up new accesses to open/green spaces and nature (policies DM 01 and DM02)" |
| DM T1-T5 | Wimbledon Society | Control of traffic behaviour, by speed reduction zones, or sequenced traffic lights etc, appears to be delivering environmental benefits to both centres and housing areas. An additional policy should indicate the Council's support for such measures. ADD NEW POLICY AFTER DMT4: "THE COUNCIL WILL SUPPORT THE INTRODUCTION OF SPEED CONTROL MEASURES, WHERE THIS WILL IMPROVE LOCAL ENVIRONMENTAL QUALITY". | Not taken forward. The council's transport policies promote sustainable choices and objectives. The use of traffic management tools, such as speed control measures can be the appropriate means of achieving movement or environmental objectives in the right circumstances or where identified in the Transport Assessment, consequently the council does not believe there is no need for a dedicated policy to achieve this. |
| DM T3 | Internal | Camden - change maximise to optimise in relation to residential | Agree with change. text change para 9.39 - Is recommended to "optimise" delete word "maximise" |
| Walking / Cycling Routes | Internal | Rename Walking/Cycling Routes back to Green Chains in Glossary | Rename Walking/Cycling Routes back to <i>Green Chains</i> in Glossary - The amendment |

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| | | | has been made. |
| Walking/Cycle Routes (Green Chains) | RESIDENTS' ASSOCIATION OF WEST WIMBLEDON | <ul style="list-style-type: none"> • Green and white dashed line. Legend states Walking/cycling route (previously known as Green Chain). Route marks periphery of Wimbledon Common and Copse Hill Conservation Area as well as some roads. Much of this marked route is inaccessible. REPUBLISH DETAIL. • North/South footpath from Lindisfarne Road to Cottenham Park Road. Important walking route to access Raynes Park and St. Matthew's School. Marked on map but footpaths not shown on Legend. | Comments suggest confusion regard legend description "walking and cycling route (previously known as green chain)" Proposed change to " <i>green chain</i> " |
| Walking/Cycle Routes (Green Chains) | Wimbledon Society | <p>Walking/Cycle route is shown as a double line with some solid green and white contained within it, and positioned largely around the boundaries of designated MOL. Unclear what the meaning of the line is. It is drawn around publicly accessible spaces, but also around private spaces, where presumably the public would not be generally able to have access: It is also shown aligned along public roads, set away from MOL: It clearly does not define an actual walking/cycle route, so the description in the Key panel may need to be amended.</p> <p>Page 329: ADD: walking/cycle routes north/south through Atkinson Morley, and East West between sites SO45 and AO10: footpath north/south from Cottenham Park Road to Lindisfarne Road:</p> | Agree with minor text change. Add to page 350 issues - improving bus infrastructure " <i>access to public transport,</i> " walking and cycling. |
| Transport - General | Wimbledon Society | Car parking on Town and Local centres needs to be reconsidered, both in the number of spaces available and the cost of parking. Currently the aim of the Council appears to be the maximizing of income from parking charges, but this needs to be tempered by the need to ensure that businesses in the centres are able to prosper, whilst not promoting car travel where it is not desirable. Anecdotal evidence suggests that short-stay charges are far too high, and are adversely affecting business activities. The current draft Policy DMT3 | Not taken forward. The council's policy approach to parking charges within its car parks and on-street falls outside council strategic planning policy. Inclusion of a new policy is therefore inappropriate in this instance. |

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| | | deals only with car parking within Developments, and which is accessible to the occupants or users of that development. But a very significant amount of local parking is provided on the public highway, and in publicly owned car parks, and planning policy should control these. ADD NEW POLICY AFTER DMT3: "THE COUNCIL WILL REVIEW THE WAY IN WHICH PUBLIC CAR PARKING CHARGES ARE SET, TO ENSURE THAT TOWN and LOCAL CENTRES and PARADES ARE ABLE TO FUNCTION EFFICIENTLY". | |
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Table 6: Summary of representations received during Stage 4 regarding appendices and the policies map

| Policy | Respondent | Comments from respondent | Action/Comment |
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| Appendices | Internal | A.1.6. 22 TN,p151: Delete "Continued" and add at the end "(subject to safety reviews)" | A.1.6. 22 TN,p151: Delete "Continued" and add at the end " <i>(subject to safety reviews)</i> " |
| Appendices | Internal | Change the order of D.1 Conservation Areas to match the maps numbering. And add a link to numbers with the Appendices D1. | Change the order of D.1 Conservation Areas to match the maps numbering. And add a link to numbers with the Appendices D1. |
| Appendices | RESIDENTS' ASSOCIATION OF WEST WIMBLEDON | Christ Church. Copse Hill, NOT 28 CONWAY ROAD, SW20. - CORRECT. | Factual error. Check council's list of statutory buildings. |
| Appendices | RESIDENTS' ASSOCIATION OF WEST WIMBLEDON | SECTION C3. Atkinson Morley Hospital Woodland. ADD. - "AND SINC LAWN". | No change proposed because the SINC citation name for site Ref. MeBI09 is 'Atkinson Morley's Hospital Woodland' and the site description includes a reference to the lawn ("Enclosed on three sides by woodland is a large rectangular lawn of acid grassland, with bird's-foot (<i>Ornithopus perpusillus</i>)"). |
| Appendices (Archaeological Priority Zones) | Wimbledon Society | It is assumed that the information on pages 363/4 will be amalgamated with the Policies maps. If the black numbering on pages 363/4 relate to archaeological zones, it could be helpful to set those numbers against the list shown at E1 on page 171. | Agreed, the Conservation areas, APZs, Scheduled Ancient Monuments etc (on pages 363-364, 365) will be amalgamated into the Policies Map. |
| Appendices (Conservation Areas, Historic Parks and Gardens, Listed Buildings) | Wimbledon Society | ADD: The schedule of the Locally Listed Buildings after Schedule D page 170: | Not taken forward. Merton's Locally listed building schedule is available on Merton Council's website and is appropriately referenced in the <i>Sites and Policies Plan</i> . Due principally to its length, we are not minded to add this to the <i>Sites and Policies Plan</i> . |
| Appendices (Conservation Areas, Historic | Wimbledon Society | D3: Christ Church is in Cottenham Park Road not Conway: page 164; D3: Listed Buildings: the correct spelling is Ridgway not Ridgeway (5 entries): p167; Page 169 Drinking Fountain | Agreed with all factual amendments D3: Christ Church is in <i>Cottenham Park Road</i> not Conway: page 164; D3: Listed Buildings: the |

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| Parks and Gardens, Listed Buildings) | | and The White House are in Wimbledon Hill Road SW19 (not "Windmill");; D3: There does not appear to be an entry for the Old Rectory in Church Road, Wimbledon. | correct spelling is <i>Ridgway</i> not Ridgeway (5 entries): p167; Page 169 Drinking Fountain and The White House are in Wimbledon Hill Road SW19 (not "Windmill");; D3: There does not appear to be an entry for the Old Rectory in Church Road, Wimbledon. |
| Appendices (Nature Conservation) | Wimbledon Society | C3: page 159: ADD: "...Atkinson Morley Hospital Woodland AND SINC LAWN" | No change proposed. Refer to response R055/C178 |
| Appendices (Nature Conservation) | Wimbledon Society | C5: page160: Sites of Importance for Nature Conservation: ADD the site W007 (page 158) and public riverside path beside the Beverley Brook at Rookwood Avenue: (see comment below for page 309). | No change proposed. Refer to response R081/C342 |
| Appendices (Open Space) | Wimbledon Society | 1) B1 page 152: MOL: Assume that the Royal Wimbledon Golf Club and the playing fields have been included within the "Common" site description: The Common itself is said to be some 267 hectares, rather than the much larger figure quoted. Assumed that the Aorangi Park and AELTC lands have been included in the "Wimbledon Park" entry. Suggest: Clarify/amend the titles, and Make clear that the open spaces which have been designated as MOL, are listed again separately in B4, B5 etc: eg SO45, M001, MO50, MO56, MO77, MO1 04 etc. 2) SO48 page 154: Address is Wimbledon: Omit "Park." 3) POO4 page 157: site changes to Education in 9/13, so Move into Schedule B4. | 1) Not taken forward: the map clearly illustrates the extent of MOL whereas local names are not always universally agreed on (either in name or extent) 2) change made 3) No change - 'Educational Open Space' is soft landscaped areas immediately surrounding the school buildings or other sports pitches for the exclusive use of the school. |
| Appendices (Open Space) | Raynes Park and West Barnes Residents Association | B.5. All Other Open Spaces: 1-3)M001 Morden Hall Park, M047 Cannon Hill Common and M072 Joseph Hood Recreation Ground are MOL, 4) P004 Sun Alliance Sports Ground should be added to B 4.2 Secondary School as Raynes Park High School including Oberon abd Fairway SW20, | 1-3) No change - these sites are designated as both MOL and open space. For the sake of clarity these sites have been listed between brackets next to the larger portion of MOL that they are part of. 4) No change - 'Educational Open Space' is |

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| | | <p>5) P006 Suggest Former London Electricity Sports Ground (LESSA), 6) P014 Delete Raynes Park Lawn Tennis Club and insert The Residents Pavilion RPandWBRA, 129 Grand Drive SW20,</p> <p>7) PO22 should read Prince George's playing fields (=is MOL),</p> <p>8) PO 23 Messines (is MOL),</p> <p>9) PO36 Playing Fields (former St Cathrine's) (is MOL). I have listed 1,2,3,7,8 and 9 because they are all MOL but do not show up under the main MOL heading. But I assume the areas of each are included in the broad heading under MOL. Hope you follow me.</p> <p>10) Also amend Pt11-74 Grid C1 P014 The Residents Pavilion Grand Drive (RPandWBRA)</p> | <p>soft landscaped areas immediately surrounding the school buildings or other sports pitches for the exclusive use of the school.</p> <p>5) No change now - change will be made for adoption version (awaiting forthcoming address database update)</p> <p>6) change made</p> <p>7) No change - this site is designated as both MOL and open space. For the sake of clarity this site has been listed between brackets next to the larger portion of MOL that it is part of i.e. Cannon Hill</p> <p>8) Change made - this site is designated as both MOL and open space. For the sake of clarity this site has been listed between brackets next to the larger portion of MOL that it is part of i.e. Cannon Hill</p> <p>9) Change made - this site is designated as both MOL and open space. For the sake of clarity this site has been listed between brackets next to the larger portion of MOL that it is part of i.e. Lower Morden</p> <p>10) P014 change will be made for adoption version (awaiting confirmation of correct name - refer to response R050/C171(a): 'Raynes Park Residents Open Space')</p> |
| <p>Appendices (Open Space)</p> | <p>Nicholson JD</p> | <p>B5 All other open space: P005 Malden Golf Course, delete "troops" and insert "traps", P006 delete "London Electricity Sports Ground (LESSA) Grand Drive and insert Raynes Park Lawn Tennis club and open space" "Meadow View Road, SW20" "3.64 (ha). NB Several houses built a LESSA site plus new tennis club open space on opposite site, P014 delet</p> | <p>P005 change made</p> <p>P006 change will be made for adoption version (awaiting forthcoming address database update)</p> <p>P014 change will be made for adoption version (awaiting confirmation of correct name - refer to</p> |

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| | | "Raynes Park Lawn Tennis Club" and insert " Raynes Park Residents Open Space""Grand Drive, SW20" NB: Raynes Park Residents association now occupy this site. | response R054/C177: 'The Residents Pavilion Grand Drive') |
| Appendix E3 b1 | Internal | Grammar change to "Providing employment, as part as of a mixed use scheme on-site" | Grammar change to "Providing employment, as part as of a mixed use scheme on-site" |
| Appendix F | Internal | To include additional information contained in the NPPF guidance which is currently out for public consultation. Included the following text "and guidance (as amended)" after reference to NPPF and "This appendix sets out a summary of what is required for sequential tests and impact assessments. Applicants should ensure that they meet the requirements of the NPPF and guidance (as amended) in full." In part D of F.1 replaced 'we' with 'the council' In F.2 included the words 'trade draw'. | To include additional information contained in the NPPF guidance which is currently out for public consultation. Included the following text "and guidance (as amended)" after reference to NPPF and "This appendix sets out a summary of what is required for sequential tests and impact assessments. Applicants should ensure that they meet the requirements of the NPPF and guidance (as amended) in full." In part D of F.1 replaced 'we' with 'the council' In F.2 included the words 'trade draw'. |
| Appendix K | Internal | Updated this appendix with more evidence base documents that needed to be included. | Updated Appendix. |
| Glossary | Wimbledon Society | It would be helpful to include in this glossary: Flood Zone (page 175): Historic Building: Locally Listed Building: PTAL. | Agreed We will update the Glossary |
| All | English Heritage | Having reviewed the draft submission in light of other councils' approach, such as Camden and Waltham Forest, we consider that there would be considerable benefit in including a paragraph for each site allocation that sets out clearly the design, context, and development opportunities. In line with the NPPF, the Site Allocations DPD provides the opportunity to interpret the Council's Local Plan policies within the context of the issues identified, resulting in a clear set of development parameters that are site specific. For example, Morden, Proposal 24 outlines the need to respect character and views to and from Morden Hall Park but does not clarify the potential | Not taken forward. Council considered the costs and benefits of taking a design led approach with respect to the sites allocated in the Sites and Policies Plan. To summarise, the council decided not to include detailed site design requirements for the following reasons: design related matters are best considered once the scale and form of development is known, information which is not available for most sites; development should be considered against policies - specifying design criteria |

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| | | <p>scale of development or clarify the local character that needs to be respected in this context. Such an approach would help provide greater certainty for potential development, identify opportunities for the enhancement of local character, and deliver sustainable proposals. Such an approach could also address our previous comments in respect of the need to recognise and respond to the Conservation Area status of grouped sites in Mitcham and the sensitivity of the site next to Wimbledon Theatre.</p> <p>Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the Draft Sites and Policies Plan</p> | <p>could pre-empt decision making before suitable information and evidence is available; specifying design criteria could unduly restrict some development without sufficient evidence; development is considered to be best determined by development control when interpreting policy; specifying design constraints could become too prescriptive and could limit flexibility on sites which does not accord with the NPPF; Merton is considered a diverse borough with few of the allocated sites exhibiting similar characteristics which would result in a relatively detailed design assessment being required for all sites in the plan, with huge inputs required for larger or more complex sites; it is considered that the council generally has sufficient information with emerging policy, conservation area and borough character studies and other documents to guide development at the time planning permission is sought - this will enable all relevant matters to be considered with a design for an entire site at one time, rather than determining various components at different stages.</p> |
| General | GLA | <p>The fact that a development plan document is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan.</p> | Noted. |
| General | GLA | Any expression of opinion from the Mayor that the Draft Sites | Noted. |

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| | | and Policies Plan and Draft Policies Map CPU is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion "will be given considerable weight" and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence. | |
| General | GLA | The Development Management Policies document submission version contains many positive aspects. The document however, remains to be not in general conformity with the London Plan in relation to the Council's position on affordable housing, and specifically the new policy DM.H3, which proposes to cap affordable rent levels at 65% of market rent. Further discussion would be welcomed in relation to this point and those issues raised in respect of student housing, transport and the allocated use for the Wimbledon Greyhound Stadium site in order to bring a document forward that is in line with national guidance and the London Plan. | Noted. Amendment proposed to DM H3 to remove reference affordable rent levels. Further discussion has been undertaken on student housing, allocation of Wimbledon greyhound stadium and transport matters. The council believes that these proposed amendments bring the document into general conformity with the London Plan |
| General | Mallon M | As a general point if the Council is going to sell land to developers please be a lot more savvy than you were with the Arthur Road development of the local hall into a grotesquely disproportionate building which is entirely unsympathetic to the character of the local area and totally unpopular with people who live in the area except for one individual who calls himself the chairman of Wimbledon Park Residents Association but speaks for no one but himself. Make sure you get overage; make sure you get clawback where development is not commenced within a period of time; make sure you get proper CIL payments; don't be bullied into accepting revised planning applications or reduced s.106 commitments from developers on the basis that their schemes are otherwise not | Noted. No amendments proposed to the Sites and Policies Plan and Proposals Map. This comment is more relevant for the forthcoming Planning Obligations SPD. |

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| | | <p>viable – with the way that resi values are going up in Wimbledon they will invariably be lying. Find out the profit on cost that developers actually expect and do deals with them as if you were a private land owner who had obtained the planning (i.e. the developer can take the first x% of profit on costs and shares the rest with you) – those are the type of deals done in the private sector – as custodians of public land don't enter into bad deals – you don't need too.</p> | |
| General | GLA | <p>As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24(1) (b) of the Planning and Compulsory Purchase Act 2004. However, it is my opinion that the Sites and Policies Plan proposed submission document is not in general conformity with the London Plan in respect to the Council's position on affordable housing, and specifically Policy DM.H3 which proposes to cap affordable rent levels at 65% of market rent. Further discussion would be welcomed in relation to this point and the issues raised in respect of student housing, the allocated use of Wimbledon Greyhound Stadium and transport in order to bring a document forward that is in line with national guidance and the London Plan.</p> | <p>Noted. Amendment proposed to DM H3 to remove reference affordable rent levels. Further discussion has been undertaken on student housing, allocation of Wimbledon greyhound stadium and transport matters. The council believes that these proposed amendments bring the document into general conformity with the London Plan</p> |
| General | Merton Council Director of public health | <p>Both the core strategy and these policies show some awareness of the influence of the built environment on health. About 70 -80 percent of what creates health comes from the interaction of factors outside health care services, including education and work/income, as well as the built environment – housing and our high streets, for example. The figure below sets out this relationship, showing that we are born with our biology/genetic inheritance and this interacts with our families and communities to influence our lifestyle choices. These are influenced by the opportunities to which we have access during our lives, especially education and work, which in turn</p> | <p>Noted with thanks. Merton's Core Planning Strategy Strategic Objectives 2 and 5 shows the overall strategic objectives of the local plan, particularly with regards to reducing social deprivation and making Merton a healthier and better place for people to live and work in or visit. In each policy section of the Core Planning Strategy the council links the policy to the relevant strategic objective. This exercise will also be completed for Merton's Sites and Policies Plan and Proposals Map.</p> |

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| | | <p>are influenced by the wider socio-economic and political environment. It would be good to reference the framework and its relationship to the policies set out in this plan. This plan seems to provide some advance in terms of health on the core strategy, which deals mainly with health care. These development management policies do go further by recognising the importance of the built environment. For example, work, open space, and sustainable transport are seen as adding value in themselves although without reference to their influence on health and well being. The plan makes mention of a requirement to undertake health impact assessment on planning proposals, which would contribute to a better understanding of the relationship between the built environment and health, among other things.</p> | |
| General | Wimbledon Society | <p>Another general point concerns the need for certainty about the force of Policies. Some Policies are accompanied by caveats which significantly weaken their basic intention, and this could encourage attempts at evasion. There is a need for all Policies to be reviewed to ensure that they send a clear message to applicants; and do not leave the public in doubt about the protection that Policies provide.</p> <p>Whilst it is understood that this type of Plan is required to concentrate on what can be knowingly achieved, nevertheless there is a case for putting together some kind of “shopping list” of projects that could eventually become part of the Council’s future plans.</p> <p>Such a list would stimulate interest and input, and give a pointer to the future, and could help in seeking investment or public funding.</p> <p>As examples, a CHP retrofit scheme for a town centre, acoustic barriers to busy traffic routes, improvements to particular pedestrian and cycle paths, pressing for large</p> | <p>Not taken forward in the Sites and Policies Plan. Merton’s Community Infrastructure Levy project lists (required under CIL Regulations 123) will contain up-to-date infrastructure projects with broad costings attached. The project list will be prepared with community consultation; anyone will be able to submit projects. Local communities will also be able to prepare their own project lists to set out how local CIL or other monies will be spent.</p> |

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| | | <p>retail to be placed in a separate use class from local shops, a replacement Civic Hall/performance space in Wimbledon town centre: the Wimbledon Way pedestrian route project and its associated public realm improvements: there are many more initiatives and worthwhile aims.</p> <p>Whilst none may currently have a specific funding stream currently available, such projects may well be thought of as desirable.</p> <p>The advent of the CIL funding regime should be a stimulus to this approach. Without such an aspirational list to draw on, future opportunities could be missed.</p> <p>If there is a resistance to incorporating this approach, may there be a case for some kind of accompanying document, that could be seen as a menu, to be drawn down as opportunities present themselves?</p> | |
| General | Internal | Change " <i>LDF Annual Monitoring Report</i> " to " Authority's Monitoring Report " wherever it occurs | Factual change |
| General | Mitcham Cricket Green Community and Heritage Group | <p>Mitcham Cricket Green Community and Heritage is the civic society for the Cricket Green Conservation Area and its environs. We have been closely involved in the development of the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. We are also part of the wider civic movement through membership of the national charity Civic Voice.</p> <p>2.The Sites and Policies DPD is an important document shaping the future development and land use of the area and we welcomed the opportunity to comment on both the potential development sites and the draft proposals map at Stages 2 and 3. We welcome a number of the changes which have subsequently been made and offer some further comments below. As part of this process we have worked with the futureMerton team at</p> | Noted with thanks. |

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| | | Merton Council and with our ward councillors to establish a clearer community aspiration for the Cricket Green neighbourhood and a number of the key development sites and opportunities within it. The results of this work are published in the report of the Tune In Cricket Green community event which was held in March 2013 and the subsequent Cricket Green Charter. These consider a number of the specific development sites as well as setting out wider aspirations for the area. We ask that they be considered prior to adopting the final document and copies are enclosed. | |
| General | GLA | Strategic issues: The Development Management Policies Document is still not in general conformity with the London Plan in relation to its affordable housing policy. The report also raises issues with regards to student housing, transport and the site allocations. | Noted. Amendment proposed to DM H3 to remove reference affordable rent levels. Further discussion has been undertaken on student housing, allocation of Wimbledon greyhound stadium and transport matters. The council believes that these proposed amendments bring the document into general conformity with the London Plan |
| General | Wimbledon Society | STRUCTURE: There is a need to review the structure of the document so that it better meets the needs of users - both members of the public and practitioners. Some progress has been made in this direction, but more needs to be done to enable those involved in, or affected by, the Council's development management policies to have a simple and clear way into this document, which will be the turn-to document for most users. FORMAT: The final shape of the formal document is not yet clear. The introductory pages (3 - 13) are a mixture of long-term plan material on the one hand, and background information about how the current document has been produced, and the consultation arrangements on the other. | Noted. The introduction will be reviewed prior to adoption and any transitory information will be removed. |

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| | | <p>Page 3 and the top two paragraphs on page 4 provide the clear statement about the various elements that go to make up the Local Plan, which the Society have requested.</p> <p>Pages 4 and 5 are historical and might form part of a preface before the formal statutory plan is reached.</p> <p>Page 6 is purely transitory.</p> <p>Pages 7 - 8 are a mixture of material which might form part of a preface, and some paragraphs (such as those on the presumption) which might be better linked with the account of what the Local Plan is in pages 3-4.</p> <p>These considerations apply also to pages 12-13, parts of which are, again purely transitory.</p> | |
| General | English Heritage | <p>We are please to note that the many of our suggested revisions (please see Claire Craig's letter of 17 August 2012) have been incorporated into the revised document. Where appropriate I have referred to our previous comments and set out any observations arising. In light of the emerging approach by other councils, I have also set out our recommendations which we consider could be beneficially incorporated into the document.</p> | Noted with thanks. |
| General | Merton Priory Homes | <p>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.</p> | Noted with thanks |
| General - Locally listed buildings | Mitcham Cricket Green Community and Heritage Group | <p>19. We encourage inclusion of the following in the Local List: Three Kings Pond – noted for the historic carriage ramps; War memorial on Lower Green West</p> | These will be assessed against the Local List criteria |
| General - Page 14 | Internal | Policy aim - change "neighbouring" to "neighbourhood" | Policy aim - change "neighbouring" to "neighbourhood" |
| General - Page 19 | Internal | Para 1.27 refers to Appendix 6 but the appendices are lettered. Amend | Para 1.27 refers to Appendix 6 but the appendices are lettered. Amend |
| General - Page | Internal | Para 1.28 refers to 800m but the figure shows 500m. Amend | Para 1.28 refers to 800m but the figure shows |

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| 20 | | one. | 500m. Amend one. |
| General - Page 23 | Internal | Para 1.39 second word correct "In" to "in" | Para 1.39 second word correct "In" to "in" |

1 Background to the site allocations

- 1.1 Sites allocations give effect to the Core Planning Strategy; by allocating sites for development in the borough. For sites that are suitable for waste management, the South London Waste Plan has also been subject to a sustainability appraisal.
- 1.2 This sustainability assessment does not therefore seek to revisit the appraisal South London Waste Plan or Core Planning Strategy, but instead focuses on the performance of the development sites and site designations against the sustainability objectives established in Merton's Sustainability Appraisal Scoping Report (2006).

Table 7: Summary of representations received during all stages regarding potential site allocations

| Site 1: 'P3' Hartfield Road car park | | |
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| Respondent | Comments | Officer recommendation |
| VM Morrisons (supermarket) | Support for the allocation including retail use however it should be reserved for expansion of the Morrisons supermarket. | The site allocation does not preclude the expansion of the Morrisons supermarket. The site is considered appropriate for A1 retail use which does not preclude the expansion of the Morrisons supermarket. As stated above, the final use of the site will be subject to viability testing and subject to design as part of a planning brief to be developed for the site. It is likely that it would provide a ground floor anchor tenant to part of a mixed use development comprising other retail uses on the ground floor with possible residential or office accommodation on upper floors. |
| Wimbledon Society | The prime use for this site should be for community and public hall based activity that is able to be used for concerts, performances, exhibitions, major social events, plus many other local community activities. Any other uses should be entirely subservient to this, and not compromise its functioning (as could be the case with housing, being noise sensitive etc). It is noted that the preferred uses do not include car parking. The council should not dispose of its freehold. All town centre sites should be planned as a group. | The allocation provides the ability for such uses to be established. The sites location in the town centre renders it suitable for a range of uses. Council is deliberately providing a degree of flexibility to ensure a viable development can be presented. Onsite parking requirements will be determined at the time a planning application is submitted in conjunction with wider studies to be completed regarding Wimbledon town centre. The 2012 parking survey identified sufficient capacity within existing car parks when taking into account the loss of this site as a private car park. Council property team officers have determined it appropriate that the site can be released to the market. As council does not own all the sites or undertake development, all the sites cannot be developed together. |
| Merton Liberal Democrats | The cumulative impact on town centre parking must be considered if both of these sites are developed (Site 1 and 28). Previous plans for an underground multi-storey car park at P3, and the removal of all parking at P4 would have ensured that a sizable | Council commissioned parking survey of Wimbledon town centre in 2012. The results showed that there is sufficient capacity in town centre parking even when taking into account the removal of both Site 01 and 28 from operation. This will remove a portion of the existing parking provision from the congested one-way |

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| | proportion of Wimbledon's town centre parking would have become concentrated around an already congested one-way system. | system. |
| Merriman D | Object to the proposals, other than for "Community and Public Hall activity". | The site allocation includes the potential to be developed for such uses. Whether this site is developed for such uses will depend on viability and market conditions. It is not considered appropriate to unduly restrict this central town centre site to a narrow range of uses without sufficient evidence regarding viability. No party has suggested to the council that the site is viable of being delivered for such use. It is considered an appropriate location for a mixed use town centre development. It is likely that a solely community/leisure facility would not be deliverable on its own. |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. The correspondence received stating expansion may be required was received prior to the correspondence stating that rationalisation was proposed. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |

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| <p>South Molton Real Estate</p> | <p>Sought clarification on the preferred use regarding “an appropriate mix of ...” and the intention of the wording, believing it states that all of the preferred uses must be included. The allocation should provide for offices. The site should be developed for a large floor plate office development.</p> | <p>The wording of the allocated uses was amended to be more clear. The site allocation enables the provision of offices within any redevelopment of the site. It is known that there is good demand for office space in Wimbledon town centre. Whether offices were included as part of any development would be subject to viability testing in conjunction with wholesale redevelopment of the site. Whilst the preference is for a suitable mixed use development to complement the town centre location, the allocation does not preclude an office based development. There is nothing in the allocation to preclude such use of the site, if the demand exists.</p> |
| <p>The John Innes Society</p> | <p>Wants consideration of the fact that existing open level surface car parks provide an “open to the sky” ambience in an otherwise overbearingly dense built up environment and views across to the dome of Wimbledon Theatre. The allocation should be subject to the provision of existing facilities elsewhere.</p> | <p>Any redevelopment of the site would be required to have specific regard to the nature of the site and surrounding uses. The site is located within the town centre but has relatively unique borders with office, retail and residential uses. Specific regard would need to be had to council’s Tall Buildings Background Paper 2010 in particular.</p> <p>Indicative massing plans have been draughted which take into account the nature of the site and surrounding area. The massing plans have specific regard to the adjoining residential properties in Ashbourne Terrace and building heights along Hartfield Road and Sir Cyril Black Way in the vicinity of the site. Further investigation in this regard will be done through the development of the planning brief to ensure an appropriate scale of development is delivered on site.</p> <p>An analysis of the parking provision in Wimbledon town centre has been undertaken and concludes that there is sufficient capacity within the town centre to accommodate the necessary demand for parking.</p> |

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| Think Future | Support for the suggested use of a major cultural development with appropriate supporting and community uses. Also supports other town centre uses but not large leisure chains. The site, in conjunction with Site 28, could strengthen Merton's position as a creative hub and offer the world's tourists a world class standard of entertainment. | <p>The site allocation includes the potential to be developed for such uses. Whether this site is developed for such uses will depend on viability and market conditions. It is not considered appropriate to unduly restrict this central town centre site to a narrow range of uses without sufficient evidence regarding viability. No party has suggested to the council that the site is viable of being delivered for such use. It is considered an appropriate location for a mixed use town centre development. It is likely that a solely community/leisure facility would not be deliverable on its own.</p> <p>If retail use is to be provided, the strategic allocation can not dictate any future proprietor.</p> |
| Whelan K | The present use is the best use. If in years to come, the need for car parking is reduced, they should be left as open spaces. We do not want the whole town centre to be built over. | site should be retained as a car park. If in years to come the demand for parking reduces the site should be left as open space. They do not want the whole town centre built over. |
| Thomas B.A | If development is considered for the site it should be more in keeping with its surroundings as opposed to the monstrosity that was planned for the site in 2006. | <p>Any redevelopment of the site would be required to have specific regarding to the nature of the site and surrounding uses. The site is located within the town centre but has relatively unique borders with office, retail and residential uses. Specific regard would need to be had to council's Tall Buildings Background Paper 2010 in particular.</p> <p>Indicative massing plans have been draughted which take into account the nature of the site and surrounding area. The massing plans have specific regard to the adjoining residential properties in Ashbourne Terrace and building heights along Hartfield Road and</p> |

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| | | Sir Cyril Black Way in the vicinity of the site. Further investigation in this regard will be done through the development of the planning brief to ensure an appropriate scale of development is delivered on site. |
| GLA | The bus stand on Sir Cyril Black Way is an important asset and must be protected from any potential development if bus services in the area are to be adequately provided. The draft allocation does not acknowledge the importance of the bus stand. TfL requests appropriate protection of the bus stand needs to be referred to unless a suitable alternative can be determined. | The bus stand was removed from the red line boundary of the site. |
| Morrisons plc | <i>Stage 3:</i> the allocation should account for the expansion of the Morrisons store which is supported by DM R1. | The allocation does not preclude the expansion of the Morrisons store. No action is required. |
| Wimbledon Society | <i>Stage 3:</i> The allocated use should include bus station. The future of the site should be formally linked with Sites 28 (The Broadway Car Park). The site should provide a significant public cultural hall and leisure facility as a replacement for the old civic hall. Residential would not be a compatible use with a proper performance hall space. Whether public parking should be provided on site should be discussed later when parking facilities for the whole town centre have been studied. | The area comprising the bus station was removed from the allocation. It was suggested that development of the site should be formally linked with Site 28 (The Broadway Car Park). Both sites are in ownership by council and are currently operated as public car parks. These car parks are surplus to requirements (there is sufficient parking capacity in Wimbledon town centre according to the study undertaken in 2012) hence council is releasing them to the market. Site 28 will be disposed of within the short term whereas this site will be disposed of in the long term (beyond 2019) due to the presence of caveats on the title regarding parking. This restricts the ability to formally link the sites and it is unclear what formally linking the sites would achieve, or how this would be done. It would either require the council to develop both sites (which the council does not currently get involved with) or |

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| | | <p>dispose of both sites to the same entity with appropriate covenants regarding development. Council has not investigated the development options to a suitable level to achieve this. Due to the size and nature of the sites, council's involvement will differ between the two with a development brief providing guidance for Site 28, but a planning brief (SPD) being developed for Site 01 which will provide more detailed guidance on viability and deliverability expectations. Based on the above it is not considered appropriate to formally link the development of both sites.</p> <p>The allocated use for the site does not preclude the establishment of a public hall and cultural leisure space. This will however be dependent on viability.</p> |
| Stage 4 consultation | | |
| GLA | TfL still has concerns over the proposal for the above site as the Sir Cyril Black Way Bus Stand is located within its boundary. | No action needed as more recent correspondence was received from the GLA advised that this comment was made in error as the bus stand referred to has been excluded from the site allocation. |
| Wimbledon Society | <p>The Society considers that it should be clearly stated in the Plan that "THE PRINCIPAL USE SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY: AND ANY OTHER USES SHOULD BE ANCILLARY".</p> <p>Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease. Additionally, this is a site that should be identified as a potential contributor to a Town Centre Combined Heat and Power (CHP) scheme (see comments on policy DMEP1).</p> | Not taken forward. The allocation does not preclude the type of development suggested within the representation. The site allocation provides for a range of uses which enables a degree of flexibility with regard to the future development of the site and the commercial viability of development given various constraints. This is consistent with town centre development and policies with the idea of creating a vibrant and viable town centre. It is also consistent with the NPPF to ensure a new development can be delivered on the site in accordance with existing and emerging policy. It is not considered appropriate to allocate the site principally for cultural, arts, leisure and community uses for several reasons. Firstly, the viability of such a development is questionable and no party has approached the council or provided |

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| | | information to suggest that such a scheme would be deliverable, as required by the NPPF. If it was viable, the allocation enables such a development to occur. It is also considered that there is a sufficient amount of existing community space available within Wimbledon town centre. Emerging policy regarding combined heat and power scheme will govern how such services are provided. |
| Mayor's office for Policing | The site is considered to have the potential for development which may impact on the policing needs. | Noted. In line with Merton's planning policies, the potential impact on local infrastructure will be considered as part of a planning application once the scale and form of development is known. |
| Wallace .S | The Hartfield Road car park should be retained as a car park - it should not be part converted to retail use - quite why you propose further Morison's (sic) expansion is baffling. Improvements could be made to improve the bus interchange adjacent to the car park which has poor and hazardous access for bus users. | Noted. The allocation does not state that the council proposes any expansion of the Morrisons store. This was proposed by the owners of the adjoining Morrisons store. The council has undertaken parking surveys within Wimbledon town centre which confirmed there is surplus parking in the town centre. Accordingly, the council decided to release the site for redevelopment. As stated in the allocation, parking demands on the site generated from any redevelopment will be considered at the time a planning application is sought. Onsite parking may have to be provided onsite as part of any redevelopment, however this will be subject to further investigation and evidence at the time of redevelopment. The bus interchange has been excluded from the site allocation at the request of the GLA and TfL and access would have to be taken into account and improved with the redevelopment of the site. |
| Wimbledon Society | The site description should be amended to state that it is council owned, and that the council has control over it as a land owner and planning authority. | Not taken forward. The site owner is not a relevant planning policy consideration with regard to the development of the site. |
| Thames Water | We have concerns regarding potable water services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or |

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| | <p>demand anticipated from this development. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.</p> | <p>wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."</p> |
| <p>Morrisons WM Supermarkets plc</p> | <p>General support for the allocation, however the site should be reserved for the proposed expansion of the existing Morrisons store.</p> | <p>Not taken forward. This level of detail cannot be achieved from a strategic planning perspective. The council has allocated the ground floor of the site for retail use among others, which many different types could contribute to the vitality and vibrancy of the town centre. To specify that the site must be for a specific user would also create potential conflicts with other commercial interests which is not a component of strategic planning. Any future development on the site will be subject to Policy DM R1 at the time of development. It is therefore considered that the text will not be amended as suggested to include reference to the expansion of the Morrisons store.</p> |

| Site 2: 43- 45 Palestine Road | | |
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| Respondent | Comments | Officer recommendation |
| <p>Eyall and Lesley Gelbart</p> | <p>Support residential</p> | <p>Support for allocation. No action needed.</p> |
| <p>Conservative Group</p> | <p>Future use should be for employment or residential use</p> | <p>The allocation conforms to one of the options suggested by the Conservative Group. The other use is the existing established use</p> |

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| | | on site. No action is required. |
| Environment Agency | Stage 3: The Environment Agency reiterated that the site is in flood zone 2 therefore a flood risk assessment will need to be submitted with any planning application. A preliminary risk assessment of any contamination on site will need to be submitted with any planning application also with regard to groundwater protection. | No action needed. The information is referred to in the allocation for consideration at the time a planning application is submitted. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 5: Colliers Wood Community Centre | | |
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| Respondent | Comments | Officer recommendation |
| Esbester D Eyall and Lesley Gelbart | Support for preferred allocation and preferred uses. Deferring delivery beyond 2018 not appropriate - should be a priority in an area that often seems to be forgotten by the Council. | No action needed. Delivery is subject to expiry of existing leases and disposal by council. |
| Conservative Group | The site should be retained as a community centre | No evidence was provided to support the position. The allocation seeks an enhanced community provision with enabling residential use and potentially some commercial use along the road frontage of the High Street to enhance the relationship with the public realm. |
| Environment Agency | Stage 3: The Environment Agency reiterated that the site is in flood zone 2 therefore a flood risk assessment will need to be submitted with any | No action needed. The information is referred to in the allocation for consideration at the time a planning application is submitted. |

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| | planning application. A preliminary risk assessment of any contamination on site will need to be submitted with any planning application also with regard to groundwater protection. | |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

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| Site 8: Leyton Road centre | | |
| Respondent | Comments | Officer recommendation |
| Green P | Change of use will result in parking, access and over crowding in this location. The representation highlights the planning permission enabling the construction of a mosque across the road (council reference 10/P1756) on the land at the junction of Merton High Street, Holmes Road and Laburnum Road which will accommodate up to 600 people, the residents of Leyton Road will be affected | The allocation recognises that certain aspects of any redevelopment will need to be addressed such as parking and overcrowding. These issues are considered to be more appropriately addressed at the time a planning application is submitted and the scale and type of development is known. Cumulative effects of existing planning permissions will be taken into account in accordance with legislation. |
| Nizar. F | The proposal to change the use on the site will not result in any positive effect. Redevelopment will result in cumulative effects from additional housing including social problems, burglaries and racial issues | Cumulative effects of existing planning permissions will be taken into account in accordance with legislation. If a mixed use development is provided on site this will facilitate the provision of modern community facilities on lower floors and create a more secure environment, helping to minimise vandalism and crime. |

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| Think Future | Good opportunity to provide outdoor space here for children; community function should be retained. | No action needed. In accordance with the allocation. |
| Conservative Group | Support for a children's centre or community use but not both. | No evidence was provided to support the claims made by the Conservative Group. The site is considered to be of sufficient size to accommodate a suitable mixed use development if desired. The site could be used for the D1 uses as suggested. |
| Environment Agency | <i>Stage 3:</i> The Environment Agency reiterated that the site is in flood zone 1 therefore a flood risk assessment will need to be submitted with any planning application. A preliminary risk assessment of any contamination on site will need to be submitted with any planning application also with regard to groundwater protection. | No action needed. |
| Protect Dundonald Rec | <i>Stage 3:</i> Support for inclusion of education in allocation. | No action needed. |
| <i>Stage 4:</i> | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
| GLA | The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted. | The text in the site allocation will be amended to refer to the requirement. |

Site 9: Mitcham Library

| Respondent | Comments | Officer recommendation |
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| Conservative Group | The site should be retained solely as a library. | Council's preference is for the library to be located closer to the town centre and this may be achievable as part of the Rediscover Mitcham project. As part of the allocation council requires the library to be retained in its current capacity as a minimum, but also opens the door for complementary uses to exist on the site. The reason for the aversion to additional uses on the site is unknown however it will provide positive planning outcomes if alternative uses can be provided. A similar outcome to the Raynes Park library redevelopment is envisaged. If the library is to be relocated the site will be available for residential and alternative uses appropriate to the locality in the vicinity of Mitcham town centre. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 14: Taylor Road Day centre- | | |
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| Respondent | Comments | Officer recommendation |
| Conservative Group | Preferred use was for the site to be retained as a community/day centre. | The allocation for the site is subject to the community use being retained either onsite or elsewhere locally. If the site is to be redeveloped solely for residential purposes, this will be subject to the community use being provided elsewhere locally. This is considered to appropriately address the concerns raised. |
| Environment Agency | <i>Stage 3:</i> The Environment Agency reiterated that the site is in flood zone 1 therefore a flood risk assessment will need to be submitted with any | No action needed. This will be considered as part of the planning application process. |

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| | planning application. A preliminary risk assessment of any contamination on site will also need to be submitted with regard to groundwater protection. | |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 15: West Barnes Library | | |
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| Respondent | Comments | Officer recommendation |
| Friends of West Barnes Library Nicholson. J.D | <p>"Use suggested/organisation" to read "Library to be retained and improved. Residential part of site to support library function – LBM."</p> <p>"Council's preferred use" to read "Library (D1 Use Class) to be retained and improved with residential (C3 Use Class) on upper floors."</p> <p>Consider opportunities which may arise from the purchase of neighbouring office buildings – e.g. scope for larger library.</p> <p>Adopt an open to creative community ideas for the re-development such as a health centre. Ensure adequate parking arrangements for library customers.</p> | The changes were accepted as suggested. Contact with the owner of the adjoining site was made however the use was being pursued and retained as offices. Initial development massing models show insufficient area for both an enhanced library facility and other D1 uses. The NHS representations have stated that there is sufficient capacity within existing clinics taking into account the development proposed in the borough. Onsite parking will be taken into account at the time of development. |
| Merton Liberal Democrats | General support for redevelopment and enhancement of the library facility with appropriate supporting uses on upper floors. They also expressed some residents' | No action needed. |

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| | views that a GP surgery may be appropriate on site and that residential use on upper floors may exacerbate parking problems in the area. | |
| McAlister. S | Considers that residential uses should not be supported on the site and that a GP/surgery type use would be more appropriate. Redevelopment also provides the opportunity to provide a community hub with an informal meeting space such as café. | D1 uses are typically not suitable on upper floors for various reasons. A draft development brief (which will be consulted on in 2014) outlines the preference for an enhanced community hub and facility. |
| Leigh. H | In principle the proposal is sound. A bigger library with expanded facilities would be a substantial gain for this community which is at the borough boundary and is often a rather neglected part of borough. Preservation of the already limited parking for library users and the provision of parking for the residential part of the development. | No action needed. |
| Conservative Group | The site should be retained as a library. | The site allocation is subject to the library use being retained and enhanced. It is therefore considered that given the library facility will be redeveloped and enhanced, that it will provide a better facility than the current one which should represent a positive outcome which accords to the preferences of the Conservative Group. Residential use on upper floors will provide the necessary enabling development to fund such enhancement. |
| Nicholson JD | <i>Stage 3:</i> expressed the desire to ensure a library facility is retained on the site and preferably enhanced. | This is proposed and referred to within the allocation. No action needed. |
| Stage 4: | | |
| Flaherty J | General support for the allocation however that as a local community service it MUST have toilet facilities. Some parking (as currently offered) would also be a positive to maintain. | It is council policy (not planning policy however) for all council libraries to contain toilets available for public use during library opening hours. No change to the wording is therefore required. |

| Site 16:Wimbledon Library | | |
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| NOTE: THIS SITE HAS BEEN RECOMMENDED FOR REMOVAL FROM THE SITES AND POLICIES PLAN | | |
| Respondent | Comments | Officer recommendation |
| Barrell. C De. Montes. M Nicholson J.D Clarke. E | <p>Opposed to any business or commercial operation in the Wimbledon Library</p> <p>Wimbledon Library is an extremely attractive building with several points of interest both inside and out and its potential redevelopment would be a great loss to Wimbledon town centre.</p> <p>The library has survived for 125 years through two world wars and its preservation should be our legacy to future generations.</p> <p>Any development or re-development must be sympathetic to the library building and surrounding area</p> <p>The library and the adult education is such an important part of Merton's responsibilities</p> | <p>The allocation is to provide an enhanced library and community facility with the potential for some alternative uses appropriate to the sites scale and location, such as small scale commercial use or residential use to the rear of the site. It is not proposed that any commercial operation would operate from within the library itself and would only complement a redeveloped library facility.</p> <p>The library building is locally listed and located within a conservation area therefore the existing proposed policies within Merton's LDF will actively seek to retain the locally listed building.</p> |
| Merton Liberal Democrats | We are in favour of the continued use of the site as a library and welcome the proposals to enhance the library provision, and would especially support use of the remaining parts of the site for community (D1 use class). | No action needed. |
| Wimbledon E. Hillside Residents Association | We are not pleased with the suggestion that Wimbledon Library (Item 16) is listed for redevelopment, and that it has been included as 'secondary shopping frontage in the map. | The representation only states that the aversion is to loss of the library and community facility, and the desire not to have restaurants, financial services and shops on the site. It is sought to provide an enhanced library and community facility which |

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| | This is a Library and a Community Serving site, and we do not want to lose that valuable resource. We are totally against this proposed redevelopment, which could include restaurants, financial services, even shops | accords to the representation. Any alternative use would be required to be complementary to the library facility and of a relatively small scale. The library is situated in Wimbledon town centre therefore is designated within the secondary shopping frontage where policies refer to protection of town centre type uses. |
| Think Future | An ideal opportunity to include the Work Free* concept within the new development proposals | This has the potential to be included and is not precluded by the allocation. |
| Whichlow. C | If high-rise blocks are permitted, particularly in close proximity to existing buildings of architectural merit (e.g. Wimbledon library), it will profoundly alter the character of the borough. The existing character of the borough is part of the reason people want to live here in the first place. | No action required. High rise blocks are not proposed as part of the Sites and Policies Plan in close proximity to the site. |
| Conservative Group | The site should be retained solely as a library | The site already contains residential use in addition to the library. The allocation seeks to provide an enhanced library facility. |
| Wimbledon East Hillside Residents Association | Stage 3: believe the council's preferred use must exclude any overtly commercial operation. The only remaining use for the 'non-library' part of this site should be for community use (D1). There is also a lack of residential parking in the vicinity. | The site is considered appropriate for town centre type uses based in its location on the main road within Wimbledon town centre. Even if this type of development was not allocated, it would not be precluded on this site. Council is seeking a development to enhance the library offer whilst also providing the ability to provide alternative, supporting and enabling uses on site, which is considered to be a more appropriate, efficient and sustainable use of the site in line with local policy. |
| Wimbledon Society | Stage 3: The issues section in the allocation should be amended to include the following references: <ul style="list-style-type: none"> It is an important public building and is a significant part of local character and heritage. Adjoining St Mark's Place should effectively be pedestrianised and no vehicle access should be provided from this location. | The allocation includes appropriate reference to the listed building and preservation of it and the service operating within. The site allocation states that pedestrian and vehicle movements from St Mark's Place should be reduced as part of redevelopment to enhance the pedestrian nature of St Marks Place. Most of the suggestions referred to do not relate to the site itself, but development and enhancement in and around the site. Market |

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| | <ul style="list-style-type: none"> The potential use of St Mark's Place for market activities. | activities are not considered as part of this allocation. |
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| Site 17: Worsfold House/Chapel Orchard | | |
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| Respondent | Comments | Officer recommendation |
| Mitcham Cricket Green community and Heritage | We favour community and educational uses for the future of Worsfold House and would encourage it being considered alongside the future of Cricket Green School. | The site is considered suitable for education use. There is no known demand for additional community uses in this vicinity. If education is not provided on the site then residential use is considered the most appropriate in order to provide additional housing to meet Merton's targets. The allocation is considered to provide an appropriate degree of flexibility for the site. |
| Think Future | Surely a school site, built with flexibility to accommodate community businesses and live/work units, would help to retain potential employment land, whilst safeguarding school places? | The site is considered suitable for education use. The allocated use accommodates most of the suggestions made with the exception of business units. This site is not considered suitable for this use due to its location being out of centre where it is more desirable for business and employment uses to be situated. |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. The correspondence received stating expansion may be required was received prior to the correspondence stating that rationalisation was proposed. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |

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| Conservative Group | School/education. | The allocation provides the ability for education to be provided. If the site is not deliverable for education use then residential is considered to be an appropriate use for the site. No action is considered necessary. |
| Mitcham Village Residents Association | <i>Stage 3:</i> Opposition to residential development and support for education. | The site is actively being considered for education purposes, however it is also considered large enough to incorporate some form of residential element. Alternatively if education is not delivered on the site it is considered appropriate for residential use. Based on guidance in the NPPF and the need for housing in Merton it is considered appropriate that residential can be provided on this site. |
| Stage 4: | | |
| Mitcham Cricket Green Community and Heritage Group | General support for the allocation. We ask that consideration be given in the final document to addressing two issues in the Cricket Green Charter through: Enhancing public access between Church Road and London Road Playing Fields as part of any scheme; Use of a Community Land Trust to undertake the development. | Noted with thanks. General support for the allocation. The Sites and Policies Plan does not dictate how CIL funds will be allocated. The remaining matters will be considered at the time a planning application is submitted. |
| Mayor's office for Policing | The site has the potential to facilitate development on a scale which would potentially have an impact on the policing needs of the area. The sites does not include reference to community facilities but is considered to have the potential for development which may impact on the policing needs. | Noted. In line with Merton's planning policies, the potential impact on local infrastructure will be considered as part of a planning application once the scale and form of development is known. |
| Thames Water | We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |

| Site 18: Pitcairn Road | | |
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| Respondent | Comment | Officer recommendation |
| Edwards M and C | Support for the allocation. | No action needed. |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. The correspondence received stating expansion may be required was received prior to the correspondence stating that rationalisation was proposed. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| Conservative Group | Employment | The site was last in employment use approximately 10 years ago and has been vacant since. The benefit of providing residential use on this site is considered to outweigh the impact of the loss of the historical employment use in this out of centre location. The site will be allocated for residential use. |
| Wimbledon Society | Stage 3: has consideration been given to providing pedestrian access through the site in conjunction with Site 80. | The site is considered too narrow and of a peculiar shape to provide suitable pedestrian access through the site. They are also physically separated from each other. Additional land would be required in between. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally |

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| | potable wastewater capability in relation to this site. | and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
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| Site 20: Wilson Hospital | | |
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| Respondent | Comment | Officer recommendation |
| Mitcham Cricket Green Community Heritage | Both sites (Wilson Hospital and Birches Close) make an important contribution to the character of the Conservation Area and have significant constraints. The site should be retained for health, education and community use. Do not support residential other than for institutional purposes on the site. Any development should respect the existing footprint of the building and avoid any loss of open space. | <p>NHS has confirmed to the London Borough of Merton that the site, subject to the Local Care Centre being provided elsewhere, is surplus to requirements. NHS has also advised council officers that the site is not preferable for the Local Care Centre primarily due to the low accessibility to public transport (PTAL 3) rendering it unsuitable for the scale of expansion envisaged. The site is therefore unlikely to generate ongoing demand for the same use due to the lack of alternative providers of such uses and the likely future of a new Local Care Centre in Mitcham being located in close proximity to the site. Based on the future of the site being unlikely to contain ongoing healthcare/community uses, the council therefore considered potential alternative uses on the site. Based on the demand and need for additional housing in Merton, a residential allocation was considered most appropriate in this instance. The benefits of allocating the site for potential residential uses (in addition to community, healthcare and education) are considered to outweigh any potential benefit achieved from allocating the site for an alternative use. The site is 1.8 ha and represents a considerable opportunity to achieve a good number of residential units on the site as a result. The demand for ongoing community, healthcare and education uses are considered to be low based on information received from the NHS.</p> <p>Any future development on the site would have to have specific regard to matters associated with the conservation area. It is</p> |

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| | | considered appropriate for future development to be assessed to determine whether and redevelopment should be confined to the existing footprint of the buildings on site. Design specific aspects of any future development cannot be determined as part of the strategic allocation due to the unknown factors such as use and density among others. Design aspects will be a primary concern if any planning application is made to redevelop the site. This is considered an appropriate mechanism of taking into account and assessing concerns relating to design and potential effects on the conservation area. |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. The correspondence received stating expansion may be required was received prior to the correspondence stating that rationalisation was proposed. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| The John Innes Society | Most of the sites which do mention a possible educational use combine it with other uses e.g. Wilson Hospital (No 20) and Birches Close (No 21) which is a half hearted approach to meeting the pressing need for new schools with a good standard of facilities such as outdoor playgrounds. | LBM Children Schools and Families Department have been involved in the preparation of the Sites and Policies Plan. The site was not identified as being needed for education in an external report commissioned by LBM for primary school places. The site adjoins Cranmer Primary School which is already proposed to be expanded. The site is considered to be large enough to accommodate a potential range of future mixed use |

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| | | developments. |
| Conservative Group | Community and health. | The future of the site depends on the location of the Local Care Centre. Community and health uses will be established if the Local Care Centre is provided on the site. The allocation also provides the ability to establish such uses on the site also. This is considered to provide the need suggested. |
| Bryce, SC | <i>Stage 3:</i> opposition to development for residential use but would support uses related to community and health, but with a preference for educational use including improved access to Cranmer School | The NHS has confirmed to LBM that the site, subject to the Local Care Centre being provided elsewhere, is surplus to requirements. The site is therefore unlikely to generate on going demand for the same use due to the lack of alternative providers of such uses and the likely future of a new Local Care Centre in Mitcham being located in close proximity to the site. Based on the future of the site being unlikely to contain on going healthcare/community uses, the council therefore considered potential alternative uses on the site. Based on the demand and need for additional housing in Merton, a residential allocation was considered most appropriate in this instance. The benefits of allocating the site for potential residential uses (in addition to community, healthcare and education) are considered to outweigh any potential benefit achieved from allocating the site for an alternative use. With respect to the access to Cranmer School, council has included reference to this in the allocation since receipt of the representation. |
| Mitcham Village Residents Association | <i>Stage 3:</i> support for principal of allocation based on provision for the local care centre or residential if it is provided elsewhere. | Support for the allocation. No action needed. |
| NHS | <i>Stage 3:</i> NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General | Support for the allocation. No action needed. |

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| | support for the allocation. | |
| Stage 4: | | |
| Mitcham Cricket Green Community and Heritage Group | We support continuing health use for this site. If this were to cease then we believe consideration could additionally be given to sensitively designed hotel uses alongside the other suggested uses. Any development should also be required to enhance public access and provide new access routes to Cranmer School to reduce the impact of the "school run" on local roads. | Noted. The representation is general support for the allocation for retention of health uses. C1 uses have not been allocated on this site because it was not suggested by the owner and is not considered a suitable location by the council being an out of centre location. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

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| Site 21: Birches Close | | |
| Respondent | Comment | Officer recommendation |
| Mitcham Cricket Green Community and Heritage | Both sites (Wilson Hospital and Birches Close) make an important contribution to the character of the Conservation Area and have significant constraints. Birches Close was covenanted for community uses and we believe both sites should continue the traditions of Cricket Green in providing for health, education and community use. We do not support residential use other than for institutional purposes on either site. | NHS has confirmed to the London Borough of Merton that the site will be surplus to requirements if the Local Care Centre is provided elsewhere. NHS has also stated that Birches Close is currently favoured for the Local Care Centre based on the most recent investigations, however it does have constraints related to size, access and transportation. The decision has not yet been by made NHS regarding the preferred site for the Local Care Centre. If the Local Care Centre is to be provided on the subject site then the site will continue, and possibly expand, the existing healthcare/community services. If the Local Care Centre is provided elsewhere, the existing services are likely to be provided on the new site, therefore the subject site would become surplus |

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| | | <p>to requirements as outlined by the NHS. The allocation therefore takes into account both scenarios by providing a range of uses suitable for the establishment of a Local Care Centre if it is to be provided on the site, or suitable alternative uses if the Local Care Centre is provided elsewhere.</p> <p>It is acknowledged that residential use may result in a range of different effects emanating from the site compared to the current use if the Local Care Centre is to be provided elsewhere. Potential effects of residential development could include noise, traffic, parking, construction related effects, litter and potential daylighting impacts depending on the scale of development. These matters are more appropriately determined during the planning application phase. It is considered that design will be a key element of any residential component and that a conversion of existing buildings on the site may be appropriate. This is evidenced by the existing planning application submitted by the NHS which was refused at appeal based on design related matters.</p> |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. The correspondence received stating expansion may be required was received prior to |

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| | | the correspondence stating that rationalisation was proposed. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| The John Innes Society | Most of the sites which do mention a possible educational use combine it with other uses e.g. Wilson Hospital (No 20) and Birches Close (No 21) which is a half hearted approach to meeting the pressing need for new schools with a good standard of facilities such as outdoor playgrounds. | LBM Children Schools and Families Department have been involved in the preparation of the Sites and Policies Plan. The site was not identified as being suitable for education in an external report commissioned by LBM for primary school places. |
| Conservative Group | School or healthcare | The future of the site depends on the location of the Local Care Centre. Healthcare uses will be established if the Local Care Centre is provided on the site. The site was not shortlisted as being suitable for providing primary school places. Should the Local Care Centre not be provided on site, residential is considered the most appropriate alternative use. |
| Mitcham Village Residents Association | <i>Stage 3:</i> support for principal of allocation based on provision for the local care centre. | Support for the allocation. No action needed. |
| NHS | <i>Stage 3:</i> NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General support for the allocation. | Support for the allocation. No action needed. |
| Stage 4: | | |
| Mitcham Cricket Green | General support for the allocation. | General support for the allocation. The allocation states the numerous constraints regarding access, design, the conservation area, and the |

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| Community and Heritage Group | | adjoining Cricket Green open space. The redevelopment of the site will be subject to policy regarding these matters at the time a planning application is made. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
| Wimbledon Society | Might this present an opportunity to provide a new Pavilion on their road frontage, (with suitable development at the rear), and develop the then vacated existing Pavilion in due course? | Not taken forward. The council has not received any information to suggest that the existing cricket pavilion should be redeveloped. The site is currently leased by the cricket club who intend to remain on the site. The existing cricket pavilion is a locally listed building and therefore has existing policy restrictions on redevelopment. As a result, the suggestion made is not being considered as part of the Sites and Policies Plan. |

| Site 22: Patrick Doody Medical Clinic | | |
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| Respondent | Comment | Officer recommendation |
| Craig, J Chedumbrum, L Piggott, S Shaw, J | Against change of use. I would feel very strongly that the health centre should be retained by the council, and maintained as necessary. Better marketing of the facilities might enhance revenue streams without losing the buildings etc themselves. | NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. The NHS has confirmed to council that the site will be surplus to requirements and available for disposal within a 3-7 year timeframe. The site is currently accommodating additional services from the Nelson Hospital which is being redeveloped. It is beyond the council's control to enforce the retention of the existing uses on the site because the site is owned by the NHS. However, the allocation enables the provision of new or continuing healthcare services (D1 Use Class) on the site. The council acknowledges that an appropriate mixed use development may be able to be designed, and is not opposed to this in principal. This is particularly relevant |

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| | | <p>if the existing service closes or relocates.</p> <p>If the NHS vacates and/or disposes of the site, it is considered unlikely to be suitable for continued use due to a lack of alternative providers of such uses and the NHS considers there is sufficient capacity in existing services. However, the allocation provides for on going D1 use therefore enabling this to occur, if viable. If an alternative D1 use is not possible on the site, redevelopment for residential purposes is considered the most appropriate use based on the nature of the surrounding area and the need for housing in the borough.</p> <p>No action is considered necessary.</p> |
| MacNab, W | The Clinic must be retained. But any development such as proposed by the Council (i.e. "healthcare and residential" - which would indicate flats being built on top of the existing building perhaps) must be carefully worked out architecturally to suit the conservation area. | <p>Refer above regarding the retention of the clinic. Design related matters will be an important consideration as part of any proposal to redevelop the site. This is acknowledged in the allocation. The following matters are considered relevant:</p> <ul style="list-style-type: none"> • the subject site is not in a Conservation Area (as stated in one representation) and the nearest Conservation Area is approximately 200 m; • development will need to respect the setting of the Grade II listed building situated opposite the site; • acknowledge the existing terraced housing on both sides of the site on Pelham Road; • avoid impacts on properties to the rear of the site on Griffiths Road; and • if a mix use development is proposed, residential uses should be on upper floors and it should facilitate the provision of well-designed community uses on lower |

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| | | floors. |
| Robinson .L | Concerned about the increase of traffic in the surrounding area and lack of parking for existing residents; with an increase of population and residential these issues will increase. | Parking and traffic related matters will be a primary consideration as part of any proposal to redevelop the site. It is acknowledged that the site and surrounding area is sensitive to new development and potential effects on existing parking demand. This is particularly relevant when considering nearby council car parks on The Broadway and Hartfield Road are also being allocated within the DPD. It is considered that if the site is redeveloped or continued for the existing healthcare use then provision should be made where possible to retain some parking on site. However, the site has a PTAL 6a rating with good public transport links. It is therefore considered appropriate that any future development could be considered for permit free development as a result. This will be determined as part of any future planning application to redevelop the site. Redevelopment is not likely to generate a significant amount of traffic, particularly if the development is permit free. |
| Conservative Group | Residential or healthcare (not both). | Refer above. |
| NHS | Stage 3: NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General support for the allocation. | Support for the allocation. No action needed. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 23: 9 Amity Grove, Raynes Park | | |
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| Respondent | Comment | Officer recommendation |
| Barrow, R and K Goddard, D | Encourage that it be used for some form of limited private residential development of no more than 4 houses with a minimum height of 2 stories, being sympathetic to the surrounding houses. Alternatively if the ground floor were redeveloped to continue provide some form of medical service (as it currently does) then the top could be developed into limited (again no more than 4) residential premises above reaching not more than 3 stories in total. Any other form of business redevelopment other than medical would be opposed. | If the site is to be used for a mixed use community and residential, or solely residential purpose it is considered appropriate that the building should have specific regard to the adjoining buildings. Redevelopment could comprise additional upper level floors or a redevelopment of the site to provide a logical extension to the existing terraces. This is considered appropriate. However it is acknowledges that the site is located within the town centre boundary therefore an exceptional design of a greater scale than the existing houses could be achieved. Design of any future development will be subject to planning permission and further, more detailed public consultation. It is noted that the building to the south is two storeys, however beyond this is a six storey office building. If the adjoining building could be included in a redevelopment, a larger scale development may be achievable and appropriate. |
| Think Future | The outdoor space seems to offer plenty of potential uses for children and families. It would be great for work free use (a dual use office/nursery environment) along with other community and business uses. Development at this location has the potential to add to the vibrancy and use of Raynes Park due to its proximity to other businesses, shops and transport links. | The site is allocated for either healthcare or residential. The site is also located within the Raynes Park town centre boundary. The site therefore has a range of development options available to it. No action is considered necessary. |
| Colebourne S | Would prefer to see this as solely residential. | The allocation was amended from enabling mixed use to being solely healthcare or residential. |
| Neal P | Supports council preferred option. | No action needed. |
| Conservative | Community/health | The allocation enables the provision for the site to be retained as |

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| Group | | a healthcare centre. |
| NHS | Stage 3: NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General support for the allocation. | Support for the allocation. No action needed. |
| Sharp J | Stage 3: no particular view on the use of the site however any new structure should not exceed the height of the existing building and that the rear of the building should not protrude any further back on the site | Whilst the strategic allocation in the DPD does not specify the type of scale of development which should result, it is considered appropriate in this instance to provide guidelines. If the site is to be used for a mixed use community and residential, or solely residential purpose it is considered appropriate that the building should have specific regard to the adjoining buildings. Redevelopment could comprise additional upper level floors or a redevelopment of the site to provide a logical extension to the existing terraces. This is considered appropriate. However it is acknowledged that the site is located within the town centre boundary therefore an exceptional design of a greater scale than the existing houses could be achieved. Design of any future development will be subject to planning permission and further, more detailed public consultation. It is noted that the building to the south is two storeys, however beyond this is a six storey office building. If the adjoining building could be included in a redevelopment, a larger scale development may be achievable and appropriate. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 24: Morden Road clinic | | |
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| Respondent | Comment | Officer recommendation |
| Tipler G | With the large number of homes being built as part of the More Morden project a healthcare centre will be needed so I am all in favour. I would also recommend apartments given the proximity to good transport links and Morden Hall Park. | Support for allocation. No action needed. |
| Clarke. E | You say that it would be good to enlarge this building as it has "good level of access to public transport (PTAL 5)". Actually, no, it doesn't! We have already asked TfL to reinstate the bus stop outside the building (which existed when the building was a library). | The site currently has a PTAL rating of 6a which is considered to have excellent access to public transport based on the criteria specified by TfL. |
| Maidment C | <p><i>Stage 2:</i> Stane Street passes through the site. The exact location should be determined, recorded and advised. See Archaeological Priority Zones, page 12 of Part III</p> <p><i>Stage 3:</i> Stane Street passes through the site. The exact location should be determined, recorded and advised</p> | This is considered to be outside the ambit of the Sites and Policies Plan. |

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| English Heritage | <p>Would benefit from including recognition of the range of Grade II listed heritage assets in the park and the fact that it is Register Park of Historic Interest.</p> <p>Stage 3: welcome the reference to the adjoining grade II registered park and the listed buildings it contains. z</p> | No action necessary due to changes made following Stage 2 consultation. |
| Conservative Group | Healthcare | |
| NHS | <p>Stage 3: NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General support for the allocation.</p> | No action needed. |
| Stage 4: | | |
| Thames Water | <p>On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development.</p> | <p>The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."</p> |

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| Site 28: 'P4' Land adjoining Wimbledon Theatre | | |
| Respondent | Comment | Officer recommendation |
| Bell Hammer | <p>Consider the most appropriate use for the above site to be offices. The majority of the office stock in Wimbledon town centre is over 15 years old and</p> | The allocation enables the establishment of offices. No action is needed. |

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| | modern occupiers are increasingly concerned at the high running costs and environmental impact of ageing plant. | |
| MacNab Piggott S | I cannot stress enough what a valuable resource this car park is to this part of Wimbledon with the theatre and the Polka centre nearby plus the various restaurants and bars in the Broadway bringing people in..... Also by removing this car park - the council will receive less money from the fees it generates. | The parking survey undertaken in 2012 showed that there was sufficient car parking capacity in Wimbledon town centre even when considering the site could be removed from operation. The site will be disposed of to the market and accompanied with a development brief to be prepared and consulted on by the council. |
| Think Future | Support Wimbledon Music Civitas Group's suggestion and the mix of town centre uses suggested by the Council. | The allocation enables the provision of such uses to be established. |
| Whelan Chedumbrum. L | The present use is the best use. If in years to come, the need for car parking is reduced, they should be left as open spaces. We do not want the whole town centre to be built over. | The parking survey undertaken in 2012 showed that there was an over-supply of parking in Wimbledon town centre even when considering the site could be removed from operation. The site will be disposed of to the market and accompanied with a development brief to be prepared and consulted on by the council. |
| Colebourne S | Wimbledon town centre would benefit from developing this site to match the height and massing opposite. However, parking for the theatre, and Sainsburys, will be a problem | Height and massing plans are being developed as part of the development brief to be consulted on. |
| Merton's Liberal Democrats | A vast majority is residential use, or at least some element of it. If this came to be, this would not be in accordance with Policy DM C2 Education. We would like to see this list of sites include proposals to build new educational facilities. Similarly, existing individual car parks are good potential sites for | The site has not been identified as necessary for providing school places by the council. Some sites were suggested as having the potential to provide school places however this site was not identified. The parking survey undertaken in 2012 showed that there was |

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| | development. However, if sites proposals 01, 12, 28, 33, 34, 58, 60, 61 were all developed in line with the expressed preferred use, vast chunks of Merton's town centre parking provision would be removed (in Wimbledon, Mitcham and Morden). | an over-supply of parking in Wimbledon town centre even when considering the site could be removed from operation. |
| Whichlow. C | Objection due to loss of town centre parking. Also states that high rise buildings will affect the character of the existing area. The provision of residential use will result in additional traffic congestion. | <p>The parking survey undertaken in 2012 showed that there was an over-supply of parking in Wimbledon town centre even when considering the site could be removed from operation.</p> <p>Any high rise building proposed on the site would be subject to emerging policy as well as existing policy in the Core Strategy which also refers to Merton's Tall Building Background Paper.</p> <p>Potential traffic impacts will be considered as part of the planning application process</p> |
| Conservative Group | Remain a car park | The parking survey undertaken in 2012 showed that there was an over-supply of parking in Wimbledon town centre even when considering the site could be removed from operation. |
| English Heritage | <i>Stage 3:</i> noted that the site was amended to include a reference to the Core Strategy policy regarding tall buildings. Evidence should be provided to support the policy direction and the appropriateness for tall buildings on the site. | The site allocations refer to the Core Planning Strategy and Merton's Tall Building Background Paper to determine the appropriateness of tall buildings in these locations. The allocations do not state that tall buildings should be provided, as implied in the representation, they merely state that if tall buildings are to be proposed on site there is appropriate policy guidance which should be adhered to. |
| Wimbledon Society | <p><i>Stage 3:</i> The future of the site should be formally linked with Site 01 (Hartfield Road Car Park).</p> <p>The site should provide a significant public cultural hall and leisure facility as a replacement for the old civic hall.</p> | <p>The site allocation does not preclude the establishment of an arts/cultural use in accordance with the cultural quarter of this section of The Broadway. This will however be dependent on viability.</p> <p>It was suggested that development of the site should be formally</p> |

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| | <p>Whether public parking should be provided on site should be discussed later when parking facilities for the whole town centre have been studied.</p> <p>The site is within the Wimbledon town centre cultural quarter and this should be reflected in the preferred uses.</p> | <p>linked with Site 01 (Hartfield Road Car Park). Both sites are in ownership by council and are currently operated as public car parks. These car parks are surplus to requirements (there is sufficient parking capacity in Wimbledon town centre according to the study undertaken in 2012) hence council is releasing them to the market. Site 01 will be disposed of within the long term whereas this site will be disposed of in the short term. This restricts the ability to formally link the sites and it is unclear what formally linking the sites would achieve, or how this would be done. It would either require the council to develop both sites (which the council does not currently get involved with) or dispose of both sites to the same entity with appropriate covenants regarding development. Council has not investigated the development options to a suitable level to achieve this. Due to the size and nature of the sites, council's involvement will differ between the two with a development brief providing guidance for Site 28, but a planning brief (SPD) being developed for Site 01 which will provide more detailed guidance on viability and deliverability expectations. Based on the above it is not considered appropriate to formally link the development of both sites.</p> |
| <p>Stage 4:</p> | | |
| <p>Wimbledon Society</p> | <p>Add: "This COUNCIL OWNED site is CURRENTLY a surface car park ". As written, the open-ended nature of the list of potential uses allows for a future developer to select only those that are currently commercially attractive. This site is located beside the Theatre, and is within the zone (extending eastwards to the Polka Theatre) that is identified in the Wimbledon Way study as an area primarily for culture and the arts. This is part of the approach to widen the offer of the Town Centre so that the overall attractiveness and prosperity of Wimbledon is</p> | <p>Not taken forward. The site owner is not a relevant planning policy consideration with regard to the development of the site. It is considered that the existing wording within the site allocation has appropriate reference to the need to assess future parking demands on and around the site as a result of development.</p> |

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| | <p>improved. Accordingly it should be clearly stated that the Allocated use should be:</p> <p>“THE PRINCIPAL USE OF THE LOWER LEVELS SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY, AND ANY OTHER USES SHOULD BE ANCILLARY.”</p> <p>Additionally, this is a site that should be identified as a potential contributor to a Town Centre CHP scheme (see comments on policy DMEP1).</p> <p>The loss of parking could be a significant issue for the well-being of this part of the Broadway: ADD therefore: “THE REQUIREMENT FOR SOME PUBLIC CAR PARKING TO SERVE THIS END OF THE BROADWAY IS TO BE ASSESSED PRIOR TO ANY SITE DISPOSAL”.</p> | |
| Sport England | <p>Leisure facilities are proposed (or are potentially proposed) for the following sites:</p> <ul style="list-style-type: none"> • P4 Land Adjoining Wimbledon Theatre | Noted. The representation states that the site includes an allocation for leisure facilities. |
| Wallace S | The car park adjacent to Wimbledon Theatre should be used for a possible community venue, not for further retail establishments. | Noted. The allocation includes the ability to establish a community venue. Presently the council considers there to be sufficient community space within Wimbledon. The allocated uses on the site accord with Merton's Core Planning Strategy and emerging policies for town centre uses. Community uses on the site are not precluded within the allocation. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |

| Site 31: Wimbledon Community centre | | |
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| Respondent | Comment | Officer recommendation |
| Think Future | Agree with the suggested uses, as this isn't the best place for a community centre. Although, the renewed Wimbledon library site could replace some of these community facilities, it would be important to keep site 27 (Merton Hall) as a large hall with wooden floor, if we were to lose this traditional community hall. | No action needed. The pre-existing community facilities were accommodated elsewhere. |
| Wimbledon Community Association | The societies preferred use is community (D1) and commercial (A2 and B1). | The allocation includes the provision for these uses. The previous community uses operating on the site have been accommodated elsewhere. |
| Conservative Group | Community | The allocation includes the provision for this use. The existing use was provided elsewhere due to the cost of maintaining the existing dilapidated condition of the building which rendered it unfit for purpose. |
| Wimbledon East Hillside Residents Association | <i>Stage 3:</i> opposition to suggested hotel use on site. Hotel should be on site 28. | A town centre location is considered appropriate in principal for hotel use (C2 use class) in accordance with local and national planning policy. |
| Wimbledon Society | <i>Stage 3:</i> There should be provision for a full range of community facilities provided on an alternative site. | Council officers have been advised that all community uses previously operating from the site have been accommodated within alternative premises. |
| Stage 4: | | |
| Wimbledon Society | "This COUNCIL-OWNED site HAS BEEN RECENTLY DEMOLISHED AND IS TO BE USED AS A TEMPORARY CAR PARK." It is important that this is said as the Council has a direct control over the future of the site as owner, not merely as a planning authority. | Partially agreed. Reference to the demolished building will be provided. The approved planning permission for temporary use as a car park is already referred to in the allocation. |

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| Wimbledon Society | <p>The allocation should be amended to be “THE PRINCIPAL USE SHOULD BE FOR COMMUNITY USE, AND ANY OTHER USE SHOULD BE ANCILLARY, UNLESS ALTERNATIVE COMMUNITY USE HAS ALREADY BEEN PROVIDED IN THE IMMEDIATE AREA.”</p> <p>Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease. Additionally this is a site that should be identified as a potential contributor to a town centre CHP scheme.</p> | <p>Not taken forward. The allocation does not preclude the type of development suggested within the representation. The site allocation provides for a range of uses which enables a degree of flexibility with regard to the future development of the site and the commercial viability of development given various constraints. Flexibility is provided with the allocation which is situated in Wimbledon town centre. This is consistent with town centre development and policies with the idea of creating a vibrant and viable town centre. It is also consistent with the NPPF 2012 to ensure a new development can be delivered on the site in accordance with existing and emerging policy. Emerging policy regarding combined heat and power scheme will govern how such services are provided.</p> |
| Thames Water | <p>On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.</p> | <p>The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</p> |
| Wimbledon Community Association | <p>The Merton Sites and Policies Plan has highlighted possible community use on a number of potential sites including the Library site (Site Proposal 16) – now no longer targeted for redevelopment, the ‘P3 Site’ (Site Proposal 01) and the ‘P4 Site’ (Site Proposal 28). The WCA is in discussion with various organisations, in particular the SWL YMCA (Site Proposal 62), with regard to helping meet that need. We will continue to develop our plans to support replacement facilities in central Wimbledon. We also wish to continue working with the Council to help meet those needs.</p> | <p>Noted. The comments provided relate to the current situation of WCA. This is not relevant to the site allocation.</p> |
| Davey E | <p>Wimbledon needs a purpose built community centre with flexible accommodation for large and small groups. It has excellent public transport links for the whole borough. I</p> | <p>Not taken forward. The Wimbledon Community Centre was closed following consultation between the council and the Wimbledon Community Association who previously owned a third of the site. Whilst</p> |

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| | would therefore not like this site to be developed for commercial, financial or business use which includes offices, retail or a hotel. It should definitely stay in Council ownership for community use. This development could include council flats for key workers that should remain in council ownership and never be sold. | existing services have been accommodated in alternative locations the association is seeking a new premises as outlined in their representation. There are numerous existing sites available for such community uses in and surrounding Wimbledon town centre, as well as all the sites allocated in Wimbledon town centre including community uses in their allocation. The uses suggested in the representation are included in the allocation, however a greater range of flexibility is provided in order to ensure a viable and sustainable development will result. The council does not own housing stock anymore; the former council housing stock is owned by Merton Priory Homes. |
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| Site 32: Wyvern Centre | | |
| Conservative Group | Community /youth centre | It was resolved at the July 2012 cabinet meeting to close the Wyvern Youth Centre and redirect services to other existing locations as part of a transformation of youth centre services. This has subsequently been put into place and the site has been sold. No action is considered necessary. |
| Tipler G | Would suggest the construction of high quality apartments to raise house prices in the area. | The strategic allocation relates to the use of the site only and does not specify site specific design or housing requirements. Development will be subject to interpretation of planning policy at the time a planning application is made. No action needed. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

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| Site 33: Elm Nursery car park | | |
| Respondent | Comment | Officer recommendation |

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| Merton's Liberal Democrats | Raised general concerns at the potential loss of town centre car parking with several sites across the borough being identified for a change of use from a car park. | All of the car parks in Mitcham are underutilised based on council officer assessments. It is therefore evident that a surplus of parking exists in Mitcham. Even if several car parks were no longer used, there would still be sufficient parking available in Mitcham Town Centre. As part of the Rediscover Mitcham project, further detailed parking surveys of Mitcham will be undertaken which will confirm the exact current and future demand for parking in the town centre. No action is considered necessary. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 35: Mitcham Fire Station | | |
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| Respondent | Comment | Officer recommendation |
| London Fire and Emergency Planning Authority (LFEPA) | All stages: the agent acting on behalf of the owner has made a representation at each stage of the public consultation. The representations have contained information regarding the owners suggested use for the site with supporting information. The suggested use for the site above reflects the most recent information received from the owners. | No action needed. The allocated use was amended to reflect the information provided by the owner (the LFEPA). |
| Mitcham Cricket Green community and Heritage | The site is one of three important buildings on the most prominent and important site in Cricket Green. Along with Vestry Hall and the Cricketers public house it forms part of a unique assemblage of buildings on an island site in the heart of the Conservation Area. | Both the use suggested by the owner and the preferred use by council includes potential community uses. The site is considered to be relatively unique based on the size, location, access, listed nature and setting within the adjoining building and Cricket Green conservation area. Flexibility is therefore offered for a range of future uses which are considered appropriate on the site. A range |

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| | There are opportunities to connect the three sites (<i>Wilson Hospital, Birches Close and Mitcham Fire Station</i>) a both physically and in the way they are used and managed which would bring important benefits to the area while respecting their individual character and overall contribution to the Conservation Area. | of uses is considered appropriate and necessary to ensure the site does not become vacant for an extended period of time. It would be difficult to connect all three sites as they are in different ownership and are likely to be offered to the market at different times. Design matters relating to the character and setting in the conservation area will be a primary consideration of any planning application to be submitted. This is evidenced by the adjoining Cricketers public house being refused planning permission on several occasions primarily on design related matters. |
| English Heritage | Concerns Mitcham Fire Station, which is a locally listed building – we refer you to our joint guidance with the London Fire Brigade about London’s Fire Stations on our HELM website. | The allocation was amended to include reference to the document. |
| Think Future | A great location for a community social / business venue, including some outdoor space for adults and children. | The allocation enables the provision of such uses. However the size of the site restricts the provision of outdoor space on site. This cannot be remedied. No action is considered necessary. |
| Mitcham Village Residents Association | <i>Stage 3:</i> support for the allocation. | Support for the allocation. No action needed. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
| Mitcham Cricket | This is the most prominent and important site in Cricket | The council considers that the site has a number of restrictions to |

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| Green Community and Heritage Group | Green and these buildings form part of a unique assemblage of buildings on an island site in the heart of the Conservation Area. We urge that this opportunity is taken to introduce a clear priority for local community and cultural uses on this site and to exclude residential development. We are therefore disappointed that the draft document only singles out the fire station site instead of addressing the whole area as an integrated whole. In respect of the fire station we support community focused mixed use development but not for this to include a residential element | development based on the size, location, access, and local listing within the conservation area. The council has therefore adopted a flexible approach in consultation with the landowner to ensure that upon disposal of the fire station, it does not remain a vacant and unused building. The range of uses included in the site allocation reflects the desire for some creativity regarding the viability and deliverability of any redevelopment, with a number of community type uses enabled. It is likely that many uses may not require upper level floorspace, and accordingly residential use is considered suitable for the upper level. With regard to the site being grouped with adjoining properties, each site is in separate ownership with different proposals for the future. The adjoining public house already has been subject to several planning appeals and still a current application. It was originally suggested to be included in the Sites and Policies Plan, however it was not included as it was the subject of a live planning application. However, a range of cultural and community uses possible with the allocation. Vestry Hall is council owned however there is no intention to dispose or redevelop the site within the next 10 years. The inclusion of residential use has been suggested and there is no policy reason to preclude such use from existing on the site. If residential use is included in a mixed use development, it will provides occupants for 24 hours a day which will benefit community safety within the site and on the street. |
| Bellamy J | The description of the Fire Station's surroundings on Lower Green West entirely omits any reference to the proximity of the War Memorial, a community memorial forming the venue for civic ceremonies. | Agreed. Reference to the nearby war memorial included in Site 35 Mitcham Fire Station in the "Site description" section. <i>Adjacent to the northwest of the site is a triangular area of open space known as Lower Green, which contains the war memorial".</i> |
| London Fire and Emergency Planning Authority | We consider that the references to community uses is inappropriate due to a variety of reasons, including that such uses are unlikely to be viable or deliverable. We believe that the designation should be a residential-led | Not taken forward. The allocation includes all the uses suggested by the owners plus the addition of community uses such as a cinema, gallery or theatre (D2 use class) which was verbally discussed with the owners. The council considers such uses would be appropriate to the location, |

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| | <p>scheme, incorporating mixed use development such as Retail (A1); Financial and Professional Services (A2); Restaurant or café (A3); Drinking Establishment (A4); Business Use (B1) and Health Uses (D1). Can you please confirm your agreement to our wording for the suggested use?</p> | <p>external and internal layout of the building and it also provides additional flexibility to redevelopment of the site, which accords to NPPF criteria. The allocation will therefore retain the ability for D2 uses to be established on the site. The council does not consider that the wording is required to specifically be a "residential led mixed use scheme" and believes the wording of the allocation can achieve this mix of uses regardless. The allocation is deliberately flexible to ensure a viable development can be delivered on the given the tricky nature of the site such as its size, structural nature, and locally listed status within the conservation area. The wording is therefore considered appropriate and consistent with the suggestion made.</p> |
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| Site 36: Chaucer Centre | | |
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| Respondent | Comment | Officer recommendation |
| Merriman D | It is stated that Merton Music Foundation school is adjacent to the site. It is located within the site (in Chaucer Building). | The allocation was amended to correct this. No action needed. |
| The John Innes Society |half hearted approach to meeting the pressing need for new schools with a good standard of facilities such as outdoor playgrounds. The Chaucer Centre, Canterbury Road does not offer an educational option other than "training". | The allocation was amended to provide community (D1) uses on site. This includes education. No action needed. |
| Think Future | There is good potential for mixed residential and community use at this site if managed well. I would have thought it prudent to safeguard this public / community / business space, as there seems to be a lot of housing around it. | The site is allocated for such uses. The site is an out of centre location therefore business uses would not be supported. No action needed. |

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| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| Conservative Group | Education and community | The allocation includes the provision for such uses. The site is considered large enough for an appropriate mixed use development to be established. If the community element is not viable then the site is in a suitable location to provide additional housing use which is needed in Merton. |
| Merton Music Foundation | Stage 3: clarification on various issues, preference for community use on the site, advising that more of the building is desired for expansion of their facility in future. | The site allocation was amended to ensure that provision for the existing community use was either provided onsite as part of any redevelopment or on an appropriate alternative location. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

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| Site 37: Wimbledon Greyhound Stadium | | |
| Respondent | Comment | Officer recommendation |

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| Greyhound Racing Association | Mixed use residential should be considered on this site. | The site is allocated for sporting intensification with supporting enabling uses. Any enabling use will be subject to meeting policy, evidence and consultation. The GRA are the site owners and the allocation has been developed in consultation with them. Later representations illustrate their support for the allocation. The site will be delivered via a masterplan and planning brief to be prepared for the site. No action is considered necessary. |
| AFC Wimbledon | The site is ideal for the return of AFC Wimbledon back in the borough. <i>Stage 3: support for the allocation and that they are working with Newridge Trading Ltd</i> | Support for redevelopment of the site and allocation to enable provision for a football stadium. No action required. |
| Hume Consulting Ltd | The whole area should be re-developed with a greyhound track and other leisure facilities. This would create employment opportunities for the borough. | The site is allocated for sporting intensification with supporting enabling uses. Any enabling use will be subject to meeting policy, evidence and consultation. The allocation enables the provision of an enhanced greyhound stadium as part of sporting intensification. No action is considered necessary. |
| Waitrose Plc | The site is in an out-of-centre location and no evidence has been submitted to demonstrate compliance with the sequential test, as required by the NPPF (paragraph 23)..... In the absence of a defined retail need (for non-central sites) and a sequential assessment of alternative sites against the NPPF criteria, the proposed allocation of the site for a foodstore fails the tests of soundness (NPPF paragraph 182), in that it is not justified and is not consistent with | Any enabling use will be subject to meeting policy, evidence and consultation. The allocation enables the provision of an enhanced greyhound stadium as part of sporting intensification. It is acknowledged that retail use is likely to comprise some form of enabling development given market conditions. Any such proposal would be subject to complying with the policy referred to. No action is considered necessary. |

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| | national policy. | |
| Christopher's Squash and Fitness Club | The existing club should be retained it's a valuable asset to the borough. | The allocation was amended in consultation with Christopher's Squash and Fitness Club following receipt of the representation. No further action is considered necessary. |
| Merton Liberal Democrats | The surrounding area has changed greatly within the last decade, with the large development of flats on Durnsford Road. As such, the area is no longer predominantly industrial. We do not support the use of the site for industry due to its proximity to residential properties and local road capacity. We feel it would be a great shame to lose the sporting heritage of the site. | The allocation was amended following receipt of this representation to remove reference to industrial and the provision of sporting intensification. No action needed. |
| Gelbert E and L | What will happen to the existing car boot area within any development? | The existing car boot market that exists on the site is subject to an agreement between the permit holder and the landowner. The retention of this agreement cannot be guaranteed by the council due to its commercial nature. |
| Rabagliati A | Strongly support the council's position. | Support for sporting intensification. No action needed. |
| London Borough of Merton Children, Schools and Families | This site should be considered for school development. | The site was considered for its potential to provide primary school places in an external report commissioned by LBM but was rejected on grounds of size and suitability. |
| South Molton Real Estate | Permitted use should include, retail A1 (with any restrictions) and car dealerships (Sui Generis). The latter use is much and unreasonably maligned. A good quality manufacturer or franchisee provides an | Retail use on the site is not promoted due to the out of centre location. Sporting intensification is preferred on the site. There is an existing car dealership located adjacent to the site. Any proposal for sui generis would be considered on its merits and |

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| | institutionally acceptable covenant, quality buildings, a business that provides a high ratio of employment (including skilled 'blue collar') to floor area and a relatively benign impact on the transport network. | more appropriately as part of a planning application. The suggestion is rejected. |
| Against Greyhound Cruelty (group email -19 people) | Greyhound racing should be stopped. | This is not a relevant planning consideration. No action needed. |
| Colebourne S | A primarily sporting use. Any increased development must reserve space either at ground level or subsurface for enhanced transport links. This might be a DLR style light railway, tram or Crossrail style main line service. (Extending Tramlink from Wimbledon to the Wandle Valley and then up to Earlsfield and Wandsworth would be one potential scheme) | Support for the allocation. Transport matters are referred to in the allocation and will be considered further as part of the planning brief to be prepared and subsequent planning application. |
| The Wimbledon Society | This is an iconic site for sport, not just locally but London-wide and nationally. The unimaginative way in which the similarly very distinctive Football ground in Plough Lane was lost, and replaced by development that failed to relate to that site's past, should be a salutary lesson, and not repeated. Local distinctiveness strongly suggests that a major Stadium/sports venue should be retained on the site. | The site is allocated for sporting intensification. No action needed. |
| Mayor's office for Policing Metropolitan Police Service | Development may have the potential to impact on policing needs. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the |

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| | | closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| London Borough of Wandsworth | General support for the allocated use subject to appropriate mitigation of public transport and parking and flood risk. Retail would not be considered appropriate as it could draw trade from nearby areas. Appropriate regard should also be given to the nearby waste site. | The allocation has regard to and states all the relevant measures and being required to be mitigated. No action needed. |
| Environment Agency | <p>The consultation document acknowledges that these sites and their surroundings are within the functional floodplain of the river Wandle (Flood Zone 3b). The sites are also within critical drainage areas for surface water flooding. As mentioned above these sites are also critical for the delivery of the Wandle Catchment Plan and the proposed Wandle Valley Regional Park.</p> <p>These sites are not suitable for residential development. We do not believe that any mitigation measures can address the issues associated with the functional floodplain and with the critical drainage areas to minimise flood risk for future occupiers and the potential for water pollution from the site.</p> <p>We have reviewed the Draft Sites and Policies DPD and are satisfied that designated nature conservation sites, open green space and biodiversity issues adjacent to the site proposals have been identified</p> | All of the information referred to in the Environment Agency representations, in particular the most recent one received as part of Stage 3, has been referred to in the allocation. This is considered an appropriate method of addressing the concerns raised. No action needed. |

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| | <p>and highlighted as issues for the majority of sites. However, we have identified the following exceptions- Site 37: Lambeth Cemetery- SINC is located over Plough Lane to the east of the site.</p> <p>The River Wandle runs adjacent to Site 64 and Site 70, a culvert runs across the north east corner of Site 37, and the Beverley Brook runs to the west of the proposed Burlington Road Strategic Industrial Locations. Development at these locations should not prevent future river restoration or the achievement of WFD objectives. Developments affecting the water-bodies may also require WFD compliance assessment.</p> <p>Groundwater and Land Contamination: Secondary Aquifer, no Source protection Ground (SPZ). Industrial setting. Will require Phase 1 Assessment for contamination potential, and Phase II Investigation if contamination known or suspected</p> <p><i>Stage 3:</i> support the redevelopment for a football stadium with a like for like footprint as it does not result in an increase in vulnerability. For development of the wider site to be acceptable the sustainability benefits would need to be demonstrated to outweigh the sites designation within the functional floodplain. Any enabling development (e.g. community/leisure, residential) should be kept to a minimum. New development would need to demonstrate no loss of flood storage, impede flows, or lead to a risk of flooding on or off site.</p> | |
| Conservative | Sporting | Support for the allocation. No action needed. |

| Group | | |
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| Brown S | <p><i>Stage 3:</i> Objection to football and residential use. Support for Greyhound Stadium and stock cars with better retail, traffic</p> | <p>The allocation is for sporting intensification which does not preclude the enhancement of a greyhound stadium facility. Council is not specifying the type of sporting intensification which may or may not occur on the site. The site is not allocated for residential use however the council does acknowledge that this may be a likely future enabling use on site. Any such proposal will be subject to local and national planning policy at the time a planning application is submitted.</p> <p>Traffic management and access will be a crucial component of future development plans for the site as referred to in the allocation. The site will be delivered via a planning brief to be prepared for the site to provide guidance on future uses. Public consultation as part of the planning brief will provide more detail in this regard.</p> |
| GLA | <p><i>Stage 2:</i> during the consultation, the GLA outlined their support for the allocation.</p> <p><i>Stage 3:</i> further discussion should be had regarding the Wimbledon Greyhound Stadium with respect to the London Plan and national guidance. The suggested use for out of centre retail causes strategic policy concern. The loss of the greyhound stadium would also raise strategic policy concerns.</p> | <p>The council is in on going discussions with the policy team at the GLA regarding this site. The council is not allocating the site for retail, and the allocation notes that any retail proposed on the site would be required to meet local and national planning policy. The GLA has advised LBM that there is no strategic policy regarding the protection of the greyhound stadium. No action is considered necessary. The site is subject of on going discussions which will be increased during the preparation of a planning brief to deliver the site.</p> |
| Laverty M | <p><i>Stage 3:</i> objection to football stadium due to traffic and supermarket</p> | <p>Any proposed retail use on site would be required to meet relevant policy including transportation, sequential test and retail impact assessment. Traffic and transportation would be a key factor of any proposal for sporting intensification. Further evidence, reporting and investigation will be required prior to any development occurring on the site. This has been referred to in the site allocation and will be a primary consideration as part of any planning application and planning brief.</p> |

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| Maidment C | <i>Stage 3:</i> Support for redevelopment to provide a football stadium. | No action needed. A football stadium could be provided as part of sporting intensification. |
| National Grid | <i>Stage 3:</i> acknowledgement that the site is in the vicinity of National Grid infrastructure and that development should take this into account. | The allocation refers to the National Grid infrastructure. No action needed. |
| Sisson A | <i>Stage 3:</i> would like to see improved public transport and a possible new Wandle River pedestrian crossing | Transport to and from the site is stated as being a paramount issue in redevelopment of the site and this is referred to in the allocation. No action is considered necessary. |
| Slade L | <i>Stage 3:</i> objection to enhancement of greyhound facility. | The representation was in relation to cruelty to greyhounds. This is not a relevant planning consideration as part of the strategic allocation. Council is allocating the site for sporting intensification which may or may not include an enhancement of the existing greyhound stadium. |
| Waitrose Ltd | <i>Stage 3:</i> objection to a supermarket on the site highlighting references to the NPPF. | Although the suggested uses for the site have included retail use, council is not allocating the site for a supermarket. Any retail development proposed on the site would be subject to relevant planning policy, including NPPF paragraphs 23 - 26, evidence and consultation. |
| Wimbledon Park Residents Association | <i>Stage 3:</i> numerous issues were raised in relation to the redevelopment of the site and the potential to provide residential and retail use and no longer includes light industrial or warehouse use. | Council previously published preferred uses for the site as sporting intensification, or industrial and warehousing. Research demonstrates that demand for industrial and warehousing land in Merton and across London and the southeast has been declining for two decades and there is no evidence that would support the allocation of this large site as additional industrial land. The council has therefore removed this reference to industrial and warehousing from the Wimbledon Greyhound Stadium allocation. The provision of any alternative use on the site such as residential or retail will be subject to local and national planning policy, evidence and consultation. The deliverability of the site will be explored in more detail as part of a planning brief to be prepared concurrently with the Sites and Policies Plan. |

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| | | <p>The Environment Agency is supportive of exploring potential mitigation measures to alleviate flood risk on the site.</p> |
| <p>Wimbledon Society</p> | <p><i>Stage 3:</i> Objection to retail development on the site as it would be contrary to policy in this out of centre location.</p> <p>Residential use is not appropriate given the site is in the functional flood plain.</p> <p>The site should be allocated for office, business and industrial use.</p> <p>A new pedestrian route across the River Wandle should be provided.</p> | <p>Retail use is not allocated on the site however it is acknowledged that sporting intensification may require enabling development which in the current market is limited to retail and residential development, which the site owners have promoted. Any retail use would be subject to relevant planning policy, evidence and consultation. Council would not accept retail development if it was contrary to policy and would be subject to sequential and impact tests. With respect to housing being inappropriate in the functional flood plain, any development on the site would be required to comply with relevant policy and ensure appropriate mitigation and emergency access measures would be paramount. The Environment Agency is supportive of exploring potential mitigation measures to alleviate flood risk on the site.</p> <p>Regarding the suggested use being for light industrial and employment led use - Council previously published preferred uses for the site as sporting intensification, or industrial and warehousing. Research demonstrates that demand for industrial and warehousing land in Merton and across London and the south-east has been declining for two decades and there is no evidence that would support the allocation of this large site as additional industrial land. The council has therefore removed this reference to industrial and warehousing from the Wimbledon Greyhound Stadium allocation.</p> <p>Regarding a new crossing over the Wandle River, public and pedestrian access to the site will be considered and enhanced as part of any planning application. This is considered to be more appropriately determined as part of the planning application</p> |

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| | | process. |
| Stage 4: | | |
| Whelan P Graham RS Walsh R | Opposition to a football stadium and support for retaining/an enhanced greyhound stadium. | The allocation does not promote the closure of the dog track or preclude the redevelopment of the site for an enhanced greyhound racing facility such as that proposed by one party. The council does not have a strategic policy with regard to retention of greyhound racing. Similarly, the GLA does not have strategic policy with regard to protection of greyhound racing in London. |
| Hume Consulting (with around 5000 supporting signatures) | As regards the ownership of Site 37, Wimbledon Greyhound Stadium, if Hume Consulting's proposal is favoured by the Council we shall protect an historic public amenity, namely Greyhound racing, for the people of London. In planning terms, Greyhound racing is an amenity which has taken place at the Plough Lane Site since 1928 and is under threat from all other proposals. Subject to the favourable consideration of our proposal to protect and develop Greyhound racing, our consortium is ready and willing to pay market value for Wimbledon Greyhound Track. | Support for the allocation, specifically greyhound racing on the site. The comments clarify the viability of the site for the submitter. Presently they are not the owner but have submitted a proposal to develop the site, subject to acquisition. |
| GLA | The GLA's previous issues concerning the potential loss of an active greyhound stadium use at the site remain and would raise strategic policy concerns regarding the protection of London's cultural heritage. The intensification of the site for uses that would support the continuation of the greyhound stadium would be supported, however, the provision of a substantial out of centre retail store as an enabling development at this site, would not be in conformity with London Plan policy. | Discussions with the GLA have taken place regarding their position with regard to the site allocation. The council's view is that the allocation will support a broad range of sporting activities, including greyhound racing, should this be deliverable on the site. The proposed allocation is sufficiently flexible to deliver different sports related proposals for the site while reinforcing that the site must principally deliver sporting activities. We believe that this approach is in line with the spirit of the NPPF and will enable the delivery of significant new sporting facilities in south London, recognising Merton's long sporting heritage and role as an Olympic borough. With regard to a substantial out of centre retail store, depending on the scale of sporting intensification proposed, the |

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| | | <p>council acknowledges that enabling development may be proposed on the site. The allocation states that any enabling development will be "subject to meeting planning policy, evidence and consultation." The council shares the concerns of the GLA regarding significant out of centre retail development as the council holds a similar town centre first policy position. This requirement would be paramount for any out of centre retail use proposed as referred to by the GLA. Such development would be subject to Merton's local plan (Core Strategy and emerging policy) as well as the London Plan and NPPF 2012. The allocation is therefore considered to be in accordance with London Plan policy as it clearly states that any enabling development would be subject to meeting relevant policy. The allocation is considered to accord with the suggestions made by the GLA.</p> |
| <p>Stockwell D Wimbledon Society</p> | <p>It would be helpful if any redevelopment of the site could enable improved access to Wimbledon Park tube station and the River Wandle from Summerstown/south Earlsfield.</p> | <p>This site is already a noteworthy leisure/sporting venue and this has consequently been identified for intensification of sporting activity.</p> <p>The existing uses already attract a considerable number of patrons and any proposal expected to attract a high level of trips would be subject to a comprehensive transport assessment so that its potential impacts on existing infrastructure can be fully assessed. Where major issues are identified, appropriate mitigation measures would need to be put in place to demonstrate that the impacts can be safely managed.</p> <p>The scope and outcome of this assessment would be considered jointly with the London Borough of Wandsworth and TfL to ensure that a consistent and joined up approach is followed. This would include agreeing the nature of any intervention required. Depending on the nature and scale of development proposals may also be subject to scrutiny and approval by the Mayor for London.</p> |
| <p>Stockwell D</p> | <p>Any development of the site needs to be compatible with</p> | <p>This requirement is clearly stated within the site allocation and noted</p> |

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| | the flood risk to the site and not increase the flood risk to other neighbouring properties. | within local and national planning policy. |
| Stockwell D Wimbledon Park Residents Association | There has been insufficient public consultation regarding the Sites and Policies Plan and the allocation for the greyhound stadium site. | The consultation methods undertaken were in accordance with local and national planning guidance. In addition, Merton Council undertook targeted leaflet drops around some sites, including the Wimbledon Greyhound Stadium site, which incorporated the area referred to in the representation. This is not a relevant consideration with regard to the site allocation. |
| Stockwell D | Any residential development of this area needs to be supported by the necessary local infrastructure. The traffic is already at standstill in rush hour on Garratt Lane and Earlsfield Station is at capacity, with people often waiting for several trains before being able to board. | The allocation states that any enabling development would be subject to meeting relevant policy, evidence and consultation. This would include necessary local infrastructure, of which transportation is a primary component. It is considered that the allocation appropriately addresses the concerns raised. Further detail will be assessed as part of the planning application process once the scale, form and type of development is known. |
| Stockwell D | One of the use suggestions includes a substantial retail store. I would question the need for another retail development given the proximity of Colliers Wood retail parks, Southside and the redevelopment of the Springfield Hospital site. Further retail facilities are not in demand from local residents and it would significantly increase traffic from other areas. It would also not be compatible with the broader policy relating to out of town development. | The allocation states that any enabling development would be subject to meeting relevant policy, evidence and consultation. It should be emphasised that this is a use suggested within one of the proposals submitted for the site and is not one of the allocated uses. It is considered that the allocation appropriately addresses the concerns raised. Further detail will be assessed as part of the planning application process once the scale, form and type of development is known. |
| Stephenson R | General support for the allocation. | General support for the allocation. No action needed. |
| National Grid | Support for the reference to National Grid infrastructure. | No action needed. |
| Sport England | There should be no loss of sporting facilities. | The site is allocated for sporting intensification. The site therefore promotes a net increase in sporting use on the site. No reduction or loss of sporting use is proposed by the allocation. The representation supports an increase in sporting uses therefore is considered to support |

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| | | the allocation. |
| Wimbledon Park Residents Association | The final description of the site is largely the same as the draft of stage 3 (January 2013). Merton Council has proposed a development for site 37 that is incompatible with its own planning guidelines contained in "Core Planning Strategy 2010" which is in turn is based on the "National Planning Policy Framework document". We note that it differs substantially from the first draft of the Sites and Policies DPD (stage 2, January 2012) which compared to the extreme position taken at stages 3 and 4 gives a much more measured proposal for site 37. This change is despite the representations that have been made to Merton Council by the Wimbledon Park Residents Association. | The council's position has not changed in relation to the allocated use for the site since Stage 2a consultation. Several proposals for redevelopment of the site have been submitted by various parties. The council has not allocated the site for any specific proposal submitted due to the range of uses proposed being subject to meeting existing and emerging policy. Regeneration of the site is referred to within the Core Planning Strategy. It is acknowledged that numerous constraints exist to redevelop the site, which is referred to within the allocation. Any substantial redevelopment of the site will have to have regard to any potential impacts on Wimbledon town centre, Arthur Road and residential areas in the vicinity of the stadium. It is considered that this is adequately referred to within the allocation. |
| Waitrose | Opposition to retail use on the site. | Not taken forward. The council is not allocating the Wimbledon greyhound stadium for retail development. Site proposals must be assessed against policies in Merton's Local Plan. |
| Walsh R | While I don't think Wimbledon Dog Track would fall under your constituency ... | The site is located within the London Borough of Merton. |
| GRA Ltd and AFC Wimbledon Snell J Wallace S | General support for the allocation. | No action needed. |
| GRA Ltd and AFC Wimbledon | General support for the allocation. A revised proposal was submitted on behalf of the majority landowner and AFC Wimbledon for a redevelopment of the stadium site. The proposal included details redevelopment which would incorporate a new 11,000 seat stadium for AFC Wimbledon (capable of expansion to 20,000 seats), circa | The representation and supporting information was acknowledged. No action is needed as the information supports the allocation in its current form. |

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| | 600 residential units, a new squash and fitness club of circa 1,000m2, a new retail store of circa 1,000m2, appropriate car and cycle parking (circa 350 spaces), servicing arrangements and landscaping. The representation also contained a substantial amount of information regarding the history of the site and the club, site selection and the level of work and investigation undertaken to date. The supporting documents submitted included; a business plan prepared by AFC Wimbledon, a masterplan design report, masterplan drawings, a stadium proposal report, a transport and highways technical note, and a flood risk and drainage technical note. | |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |

| Site 41: Kingston Road opposite Lower Downs (Land between 424-448 Kingston Road, Raynes Park | | |
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| Respondent | Comment | Officer recommendation |
| Merton Liberal Democrats Maidment C Apostles Residents Association Fischer P Frost C Maidment C | These representations are generally summarised as suggesting the site should be used for alternative uses such as a park or open space, roundabout or nature conservation and a range of traffic, parking and safety issues. | Numerous issues were raised from various parties which can generally be summarised as follows: <ul style="list-style-type: none"> • Loss of open space; and • The site should be considered for open space, a Site of Importance for Nature Conservation (SINC), a park or generally protected in its current form. <p>There is no evidence to suggest that the site is of importance to</p> |

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| <p>Plant J Wynne A</p> | | <p>nature conservation. The site was not considered for open space because it does not meet the criteria derived within the Development Plan Document which is guided by the National Planning Policy Framework and London Plan. Firstly, it is not publicly accessible (legally) and is in private ownership. Secondly, The area of “open space” on the site is approximately 620 m² which is considered to be small (<1000 m²) and too restrictive and thus a limited functional use as open space based on the criteria. Whilst the site might provide some visual amenity, it is in private ownership and would also not offer important opportunities for sport and recreation, thus fails to meet the criteria to be designated as open space.</p> <p>There is also an overwhelming need for housing in Merton in order to meet housing targets set for Merton by the Mayor of London. Residential is therefore considered the most appropriate use for the site.</p> <p>Numerous issues were raised from various parties which are generally be summarised as follows:</p> <ul style="list-style-type: none">• Parking issues associated with development of the site;• The existing on-street parking supply in the vicinity of the site is considered to be insufficient;• Access to the site;• The existing junction is dangerous, sight visibility along the road will be affected, site should be used for a roundabout; and• The pedestrian crossing should be enhanced. |
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| | | <p>It is considered that an only an appropriate scale of residential development could be accommodated onsite which reflects the nature of the adjoining and surrounding terraced houses in the vicinity. The site is therefore only likely to accommodate a limited number of terraced houses. Approximately 4-8 units based on the site and surrounding area is considered appropriate, subject to site specific design. Onsite parking should be assessed at the time of planning application to determine whether safe ingress and egress can be achieved as part of redevelopment. Onsite parking should be provided if possible. If not, it is considered appropriate that the development possibly could be car free, or alternatively seek a parking permit for the surrounding CPZ's (Merton council is also undergoing further consultation and research regarding new and further CPZ's in the vicinity). Overall, the likelihood is that only a very few (if any) number of additional vehicles using the road network and placing additional demand on parking will result from allocation and development. Significant or measurable adverse impacts are therefore not anticipated.</p> <p>With regard to traffic, access and road safety issues raised, overall the development will not result in a measurable or significant change to the existing environment. That is, the resulting vehicle movements generated from redevelopment would not be significant compared with the existing road network. No measurable traffic effects will result from redevelopment (subject to the provision of safe ingress and egress, if possible).</p> |
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| | | Several representations stated that the existing intersection is dangerous and should be reconfigured to provide a roundabout, which is likely to require land from the site adjoining the highway, i.e. the subject site. These claims were not supported by any evidence. Council has obtained accident data for the 5 years up until September 2012 and there was only one recorded injury causing accident crash according to the police data. The existing alignment and traffic measures at the junction are therefore considered to not require alteration from a transport planning perspective. The intersection has a signal controlled crossing for pedestrians which is also considered appropriate, suitable and safe for the environment. |
| JCDecaux UK | We confirm that the land is in the freehold ownership of JC Decaux UK Limited and there is no other party with an interest in the land. It's currently used as an advertising site, which is our core business and have done so for many years; however, the suggestion that the land would be favourably considered by the Council for residential development is of interest. | No action needed. The site has subsequently been sold by JCDecaux Ltd. |
| Conservative Group | School or employment | The site was considered in an external report commissioned by LBM for its suitability for a school but was reject on grounds of size, external space, traffic and noise. This out of centre location would not conform to planning policy for providing new employment land. These suggestions are therefore rejected. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, |

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| | | applicants should discuss with Thames Water how capacity will be provided." |
| Stage 4: | | |
| Wimbledon Society | The junction could possibly be improved by a small amount of road widening at the frontage of this site. | The site allocation contains appropriate reference to transportation matters required to be addressed in order to deliver the site. Should a planning application come forward then access issues will require careful scrutiny. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 46: The Old Lamp Works | | |
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| Respondent | Comment | Officer recommendation |
| Wisepress Ltd. | In summary, we would like to re-iterate our support for the Council's proposed allocation of the Old Lamp Works site for redevelopment. Furthermore, we welcome the Council's recognition that this site is suitable for residential use. | Refer below. The allocation was subsequently amended in consultation with the owner. |
| Conservative Group | Employment or office use. | The council acknowledges the information submitted by the agent acting on behalf of the owner with regard to the use being solely for residential. The evidence submitted includes detailed information regarding the condition and limitations of the existing building for ongoing employment use. The existing operation has outgrown the functional use of the building and it is anticipated that they will relocate within the borough, ideally to a purpose built facility in the nearby industrial area. Council therefore agrees that residential is the most appropriate allocated use for the site given there will be not net loss of jobs following allocation, only the loss of a scattered employment site. The owner also submitted historic |

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| | | marketing evidence which illustrated that the site was not desirable even when the market was substantially stronger. The protection of existing employment was considered appropriate in principle. However, the owner submitted evidence to state that there would be no net loss of employment or jobs and that overall they wish to move and expand their existing operations within the borough. On going employment use would also require the existing building to be demolished and redeveloped from the ground up to ensure its on going suitability for employment use. It was stated that this is not economically viable. This was accepted when considered against the overwhelming need for housing in Merton. The surrounding area is largely residential in nature, with several scattered employment sites to the east. The allocation is therefore considered appropriate in this instance. |
| Protect Dundonald Rec | Stage 3: Support for inclusion of education in allocation. | No action needed. |
| Wisepress Ltd | Stage 3: Support for residential. Opposition to community use. | The allocation was amended in consultation with the landowner (Wisepress Ltd) and now includes education, but only in conjunction with neighbouring sites to more clearly reflect the information stated in the Primary School site search commissioned by LBM. |
| Stage 4: | | |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

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| Site 48: Land at Bushey Road (80-88 Bushey Road, Raynes Park) | | |
| Respondent | Comment | Officer recommendation |
| London | This site should be considered for school | The allocation includes the provision for D1 community uses. No |

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| Borough of Merton Children Schools and Families | development. | action needed. |
| Colebourne S | Do not believe that residential development is suitable for this site. | Residential is not included in the allocation. No action needed. |
| Costco | The site as a Locally Significant Industrial Site is allocated for B1b, B1c, B2, B8 and employment generating sui generis uses. Where it can be demonstrated that there is no demand for these uses, other uses such as bulky goods retail (A1), residential (C3) and school (D1) may be considered. | The site is allocated for an employment led development of the site in accordance with the designation as a locally significant industrial site. No action needed. |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| Conservative Group | Employment | The site is allocated for an employment led development. No action needed. |
| Axa Real Estate and | Stage 3: Support for Next, rewording of some aspects. | The representation sought amendments to the wording of the allocation for new uses. In particular, it sought to change the |

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| Next plc | | councils position on the provision of A1 retail being predominantly for bulky goods. Council does not support A1 fashion retail in this out of centre location and therefore will not change the wording to make this use more appropriate on the site. The site is an out of centre location and amending the wording as desired would be contrary to local and national planning policy. |
| Blossom Lower School and Upper House | <i>Stage 3:</i> Support for education to be included in the allocation. | Support for allocation including education. No action required. |
| Friends Life Axa Real Estate | <i>Stage 3:</i> the land containing Pets at Home/Topps tiles that was formerly included as part of site 48 should be included in the allocation. | This portion of land was previously removed from the as no evidence was provided to show the site was available and thus deliverable within the lifetime of the Sites and Policies Plan. The council was advised that the owner also seeks an expansion/enhancement of the existing bulky goods retail use on the site. This is more appropriately considered through a planning application as opposed to a strategic allocation. |
| Ignis Asset Management | <i>Stage 3:</i> Support for mixed use allocation however it shouldn't be reliant on light industry. | Council will continue to support the requirement for redevelopment to be employment led based on the site being a locally significant industrial site. |
| Stage 4: | | |
| Friends Life Limited | Clarifying they are now the freehold owner of part of the site as well as adjoining land which they suggested should be included in the site allocation. Submitted that they do not consider industrial or office use to be viable on the site. | This first part of the comment refers to an adjoining site which was previously included in the site allocation but subsequently removed as the owners stated to the council that only an expansion of the existing A1 use on the site was proposed. This was not supported from a planning policy perspective and did not require a strategic allocation as an expansion is more appropriately considered as part of a planning application. The site has been assessed for its suitability as an industrial site as recently as 2010 and 2011. Merton's Employment and Economic Land Study 2010 identified the site as being "god quality" and stated it should be retained as a mainly industrial site. Merton's Core Planning |

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| | | <p>Strategy 2011 recognised this study and retained the site as a Locally Significant Industrial Site. The allocation for an employment led redevelopment has been primarily based on these two documents. Since this time, two of the larger buildings on the site primarily used for office use have been vacant since 2010. Marketing evidence submitted to the council illustrates that the site is not suitable for ongoing office use in the current market conditions. The evidence therefore suggests a lack of market interest in office use only. The site allocation reflects this information by allocating the site for an employment led mixed use scheme, with options for alternative uses considered appropriate on the site. The allocation doesn't require whole site to be employment uses and enables a range of alternative uses considered suitable to the location taking into account the out of centre location, the LSIS designation, the flood risk, its proximity to the A3 and relatively poor level of access to public transport. The allocation provides for an employment led mixed use development which ensures an employment component to redevelopment which is consistent with the LSIS designation, but also a range of alternative uses which are considered suitable on the site. The two vacant buildings on the site were both historically B1[a] uses with offices and these are the only buildings on the site which have been vacant for a period of time. Office uses have therefore not been included in the allocation due to the prevalence of market evidence which suggests they are not viable in current market conditions. Overall, it is considered that the allocation enables regeneration of the site which is consistent with local research and evidence (Employment and Economic Land Study, Core Strategy) regarding the provision of employment uses on the site, but recognises that flexibility can be provided as suggested in the representation with a range of alternative uses considered suitable for the site.</p> |
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| Site 53: Brook House | | |
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| Respondent | Comment | Officer recommendation |
| Liongate Properties | Preferred future use for the property remains residential (class C3). Cannot agree that the grouping together or linking of the Cricket Green sites provides any greater benefits to the area in terms of future land use proposals or the provision of facilities over the individual pursuit of the sites as currently proposed by the two separate landowners. | Refer below. The allocation was amended in consultation with the owner. |
| Conservative Group | School or employment | The site is an out of centre location therefore is not suitable for the promotion of employment use. The site has planning permission for a school therefore this was not included in the allocation as it represents the existing situation. |
| Liongate Properties | <i>Stage 3:</i> Support for the allocation. | No action needed. |
| Mitcham Village Residents Association | <i>Stage 3:</i> the allocated use for a nursing/care home or hotel is supported. | There was no objection to the remaining uses therefore no action is required. |
| NHS | <i>Stage 3:</i> NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General support for the allocation. | No action needed. |
| Stage 4: | | |
| Lionsgate Properties | Support for the allocation. | No action needed. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water capability | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally |

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| | in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |
| Wimbledon Society | The allocation should include provision for the existing Mitcham Cricket Club pavilion to be relocated. | Not taken forward. The council has not received any information to suggest that the existing cricket pavilion should be redeveloped. The site is currently leased by the cricket club who intend to remain on the site. The existing cricket pavilion is a locally listed building and therefore has existing policy restrictions on redevelopment. As a result, the suggestion made is not being considered as part of the Sites and Policies Plan. |
| Mitcham Cricket Green Community and Heritage Group | General support subject to acknowledgement of the constraints which will exist to redevelop the site. | The allocation references the matters raised. General support for the allocation. |

| Site 57: Morden underground Station offices and retail units | | |
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| Respondent | Comment | Officer recommendation |
| Transport for London (TfL) | Overall, we welcome the general principles set out in the Draft Sites and Policies DPD in respect of development on TfL land identified as site proposals 57, 58, 59, 60 and 61. | Support for allocation. No action needed. |
| Think Future | Do <u>not</u> agree that this site should be purely residential, as suggested by TfL. Agree with the Council's preferred use, and the issues identified. | The site is not allocated for residential use. No action needed. |
| Tipler G | High class apartments would be the best use of the area. | The site cannot be allocated for residential use due to its location essentially being a bridge. The allocation therefore does not |

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| | | include residential. Residential use is included on adjoining sites. This site allocation will therefore not be amended. |
| English Heritage | We note that this site proposal concerning Morden Station identifies the tall building reference in the borough's Core strategy. We recommend that if this is to be included here that such references are included consistently throughout the site allocations. For example Site proposal 28 doesn't appear to reference the Wimbledon Town Centre approach in the same way. | The site allocation refers to the Core Planning Strategy and Merton's Tall Building Background Paper to determine the appropriateness of tall buildings in these locations. The allocations do not state that tall buildings should be provided, as implied in the representation, they merely state that if tall buildings are to be proposed on site there is appropriate policy guidance which should be adhered to. |
| Merton Park Ward Residents Association | There appears to be an imbalance in the provision of new residential sites to the provision of essential services for these new residents such as schooling and health provision. We are also somewhat concerned that a number of car parks in close vicinity are included for redevelopment as residential or mixed use sites (for example the Peel Road, Morden Station and York Close sites). | The NHS has confirmed in written representations that there is sufficient capacity in existing sites for healthcare related services even when considering the additional development sites. The exception is Site 24 which is allocated for an enhanced medical facility which is supported by the NHS. The site was not identified as being potentially required for education use by the LBM Children Schools and Families Department in the representations made. Existing and emerging policy enables the provision of education use subject to certain criteria. |
| Conservative Group | Retail and /or offices | Support for the allocation. No action needed. |
| TfL | Stage 3: general support for the allocation. | Support for the allocation. No action needed. |
| Stage 4: | | |
| GLA | The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted. | The text in the site allocation will be amended to refer to the requirement. |
| TfL | Support for the allocation. | No action needed. |

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| Site 58: Sainsbury's (Peel House, Morden) | | |
| Respondent | Comment | Officer recommendation |
| Sainsbury | Support re-development of the underused site in | This accords to the allocation. No action needed. |

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| Supermarket Plc | Morden. Any development proposed in this area should provide adequate car parking. | |
| Transport for London (TfL) | Overall, we welcome the general principles set out in the Draft Sites and Policies DPD in respect of development on TfL land identified as site proposals 57, 58, 59, 60 and 61. | Support for the allocation. No action needed. |
| Think Future | Do <u>not</u> agree that this site should be purely residential, as suggested by TfL. Agree with the Council's preferred use, and the issues identified. | Support for the allocation. No action needed. |
| Tipler .G | Would be in favour of a mix of retail (High street chains rather than independents), restaurants and Cafes in the form of a shopping mall on the first three or four floors with offices built above. | This accords to the allocation. No action needed. |
| Merton's Liberal Democrats | A vast majority is residential use, or at least some element of it. If this came to be, this would not be in accordance with Policy DM C2 Education. We would like to see this list of sites include proposals to build new educational facilities. Similarly, existing individual car parks are good potential sites for development. However, if sites proposals 01, 12, 28, 33, 34, 58, 60, 61 were all developed in line with the expressed preferred use, vast chunks of Merton's town centre parking provision would be removed (in Wimbledon, Mitcham and Morden). | This accords with the allocation. Town centre parking in Morden will be a primary consideration for the planning brief to be prepared as part of the moreMorden masterplan. |
| Merton Park Ward Residents Association | There appears to be an imbalance in the provision of new residential sites to the provision of essential services for these new residents such as schooling and health provision. We are also somewhat concerned that a number of car parks in close vicinity are included for redevelopment as residential or mixed use sites (for example the Peel Road, Morden | The NHS has confirmed in written representations that there is sufficient capacity in existing sites for healthcare related services even when considering the additional development sites. The exception is Site 24 which is allocated for an enhanced medical facility which is supported by the NHS. The site was not identified as being potentially required for education use by the LBM Children Schools and Families Department in the representations |

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| | Station and York Close sites). | made. Existing and emerging policy enables the provision of education use subject to certain criteria. |
| Metropolitan Police Service | It is recommended that the proposed use for this site is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| Squires N | Concerning the development, Site proposal 58, Sainsbury's (Peel House) car park. This is apparently not owned by TFL, but leased by them from a property company | TfL has confirmed they are the freehold owners of the site. |
| Conservative Group | Car park | No evidence was submitted to support the retention of the car park. The site is currently subject to the Morden Station planning brief which is considering a number of sites collectively for redevelopment. A key consideration of the planning brief is to maintain an appropriate level of town centre parking as well as parking for Sainsbury's. The planning brief will ensure appropriate parking provision in the town centre. No action is therefore needed. |
| Sainsbury Supermarket Plc | <i>Stage 3:</i> Support re-development of the underused site in Morden. Any development proposed in this area should provide adequate car parking. | No action needed. To be considered further as part of the Morden Station Planning Brief. |
| TfL | <i>Stage 3:</i> general support for the allocation. | No action needed. |
| Stage 4: | | |
| GLA | The site appears to be within 50 metres of London | The text in the site allocation will be amended to refer to the |

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| | Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted. | requirement. |
| TfL | Support for the allocation. | No action needed. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |

| Site 59: Corner Baltic Close and High Street Colliers Wood | | |
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| Respondent | Comment | Officer recommendation |
| Gelbert E and L Maidment C | Support residential The parade of shops and residences to the north of the site is of "poor quality" so knock them down, like the Council did before, to build the Community Centre next to the Red Lion. | The parade of shops to the north are not included in the allocation therefore cannot be considered as part of the Sites and Policies Plan. Residential uses are allocated on upper floors with town centre type uses on the ground/lower floors which provides a mixed use development suitable for a town centre location. No action needed. |
| Transport for London (TfL) | Overall, we welcome the general principles set out in the Draft Sites and Policies DPD in respect of development on TfL land identified as site proposals 57, 58, 59, 60 and 61. | Support for the allocation. No action needed. |
| Think Future | Agree with the Council's suggestions and do not want to see this as a purely residential development. | Support for the allocation. No action needed. |
| Colebourne. S | This should definitely be regenerated together with the neighbouring shops. However, it would achieve the best result if Oslo Court was also replaced. The road | The parade of shops to the north and Oslo Court adjoining the site are not included in the allocation therefore cannot be considered as part of the Sites and Policies Plan. Transport and public realm |

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| | would need access enhancements, including an eastbound bus lane. | enhancement will be considered at the time a planning application is submitted. More than £3m of funding from the Mayor's Outer London Fund has been attributed to improving the public realm in Colliers Wood between 2013 and 2016. |
| Maidment C | <i>Stage 2/3:</i> The parade of shops and residences to the north of the site is of "poor quality" so knock them down, like the Council did before, to build the Community Centre next to the Red Lion. This parade is two hundred years old and must be worth saving. The Royal Standard at the end of the parade is a handsome building and even older. By all means Grade II list the tube station, but why not the Royal Standard | The area in question is not being considered as part of the Sites and Policies Plan. The parade of shops was not submitted as part of the Stage 1 call for sites process as being suitable for redevelopment. No action is necessary. |
| National Grid | <i>Stage 3:</i> acknowledgement that the site is in the vicinity of National Grid infrastructure and that development should take this into account. | The allocation refers to the National Grid infrastructure. No action needed. |
| TfL | <i>Stage 3:</i> general support for the allocation. | No action needed. |
| Stage 4: | | |
| GLA | The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted. | The text in the site allocation will be amended to refer to the requirement. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |
| National Grid | Support for the reference to National Grid infrastructure. | No action needed. |

Site 60: York Close car park

| Respondent | Comment | Officer recommendation |
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| Transport for London | Overall, we welcome the general principles set out in the Draft Sites and Policies DPD in respect of development on TfL land identified as site proposals 57, 58, 59, 60 and 61. | Support for the allocation. No action needed. |
| Tipler G | In favour of high calibre apartments to raise house prices in the area, however, the parade of shops and area adjacent to this would need to have investment as it is quite run down. | Support for the allocation. No action needed. |
| Merton's liberal Democrats | Concern over loss of town centre parking. | The parking survey undertaken in Morden town centre identified that this site is heavily used by commuters, a large majority for LBM employees. LBM has no obligation to provide parking for staff. Town centre parking will be considered as part of the Morden Station planning brief to ensure sufficient parking is provided following redevelopment of the town centre. |

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| Merton Park Ward Residents Association | There appears to be an imbalance in the provision of new residential sites to the provision of essential services for these new residents such as schooling and health provision. We are also somewhat concerned that a number of car parks in close vicinity are included for redevelopment as residential or mixed use sites (for example the Peel Road, Morden Station and York Close sites). | The NHS has confirmed in written representations that there is sufficient capacity in existing sites for healthcare related services even when considering the additional development sites. The exception is Site 24 which is allocated for an enhanced medical facility which is supported by the NHS. The site was not identified as being potentially required for education use by the LBM Children Schools and Families Department in the representations made. Existing and emerging policy enables the provision of education use subject to certain criteria. |
| Conservative Group | Car park | The parking survey undertaken in Morden town centre identified that this site is heavily used by commuters, a large majority for LBM employees. LBM has no obligation to provide parking for staff. Town centre parking will be considered as part of the Morden Station planning brief to ensure sufficient parking is provided following redevelopment of the town centre. |
| TfL | Stage 3: general support for the allocation. | No action needed. |
| Wimbledon Society | Stage 3: will the loss of public parking damage the town centre. | The car park is predominantly used for commuters working at LBM. Town centre parking provision will be considered and is proposed to be redeveloped as part of the moreMorden Masterplan which was approved as part of the Core Strategy. |
| Stage 4: | | |
| TfL | Support for the allocation. | No action needed. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water |

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| | | supply or wastewater services." |
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| Site 61: Morden underground Station car park | | |
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| Respondent | Comment | Officer recommendation |
| Transport for London | Overall, we welcome the general principles set out in the Draft Sites and Policies DPD in respect of development on TfL land identified as site proposals 57, 58, 59, 60 and 61. | Support for the allocation. No action needed. |
| Tipler .G | Would be in favour of a mix of retail (High street chains rather than independents), restaurants and Cafes in the form of a shopping mall on the first three or four floors with offices built above. | General support for the allocation. The Sites and Policies Plan can not depict the type of retailer to establish on the site. |
| Merton's Liberal Democrats | Concern over loss of town centre parking. | The parking survey undertaken in Morden town centre identified that this site is heavily used by commuters, a large majority for LBM employees. LBM has no obligation to provide parking for staff. Town centre parking will be considered as part of the Morden Station planning brief to ensure sufficient parking is provided following redevelopment of the town centre. |
| TfL | <i>Stage 3:</i> general support for the allocation however it should include retail use. | This was proposed by TfL as it was deemed that excluding such use classes could limit future development options and regeneration potential. Council does not consider this allocation appropriate as if it had an allocation for retail use, there would be nothing to stop the site being developed solely for this use independently from the remainder of the moreMorden project. This risk will not be borne by the council as it is not considered an appropriate site for retail for the following reasons: <ul style="list-style-type: none"> • The site is primarily surrounded by residential development • The site is located outside the town centre boundary • The site is physically separated from the high street and the desired area for retail enhancement. |

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| | | If, as a result of the moreMorden project, that some form of retail use was considered appropriate to expand into the site, this should be considered as part of detailed viability and appropriate impact assessments at the time of development. There is insufficient evidence to allocate the site for retail use at this point in time. It is also considered likely that if such a scale of development resulted on the site that it is likely to be beyond the timeframe of the Sites and Policies DPD (i.e. beyond 2024). |
| Stage 4: | | |
| GLA | The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted. | The text in the site allocation will be amended to refer to the requirement. |
| TfL | Support for the allocation. | No action needed. |

| Site 62: Wimbledon YMCA, Wimbledon | | |
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| Respondent | Comment | Officer recommendation |
| Merriman D | Object to the proposals, other than that jointly proposed by ORION and YMCA | The site is owned and proposed to be developed by Orion/YMCA. No action needed. |
| Think Future | Agree with the suggested/preferred uses. Would like to add the Work Free* concept into the discussion: Parents, who want to work locally whilst their child is looked after, would add to the diverse mix of people who use the YMCA. | Support for the allocation. Work free type uses would fall under the D1 category in the allocation. No action needed. |
| Colebourne. S | Definitely should be redeveloped to continue this section of the Broadway. Building heights in line with other local buildings. Mixture of uses is acceptable here with perhaps sports on the ground floor. | Support for the allocation. Comments regarding site specific design matters and location of uses are not determined prior to the planning application. No action needed. |
| Conservative Group | Community and Leisure | These uses are included in the allocation. The site is unlikely to be viable to be solely community and leisure uses. Council has not received any evidence to suggest it would be. No action |

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| | | needed. |
| Wimbledon Society | <p><i>Stage 3:</i> The preferred uses should major on community, leisure, culture and hostel/hotel. The site is within the cultural quarter and arts type uses should reinforce this with active frontages containing the appropriate cultural supporting activities.</p> <p>The height should be no greater than the CIPD building opposite to avoid a canyon effect.</p> <p>There should be no traffic access from The Broadway. There is potential for shared access from Trinity Road serving properties to the west also.</p> | The allocation includes the preferred uses suggested by the Wimbledon Society. The design related matters (including height) referred to will be considered and taken into account during the planning application process. Council is not specifying design related matters within the site allocations as this is considered to be more appropriately determined through policy interpretation through the planning application process. An active frontage will be required on this site as referred to in the allocation. It is acknowledged that access should not be permitted from The Broadway and this is referred to in the allocation. |
| Stage 4: | | |
| Sport England | Objection to any loss of sporting facilities. Support for the allocation as it includes leisure facilities. | General support for the allocation which includes the ability to establish sports facilities as well as containing existing sports facilities. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |
| Wimbledon Society | This site is within the "Culture and Arts" zone, identified in the Wimbledon Way report, and the street level uses should therefore be predominantly for Community, Arts and Leisure. As written, the open-ended nature of the list of potential uses allows a future developer to select only those that are currently commercially attractive. Additionally, this is a site that should be identified as a potential contributor to a town centre CHP scheme. (See | Not taken forward. As illustrated in Merton's Core Planning Strategy policy CS6 "Wimbledon" (c) and on the Wimbledon sub-area diagram, a cultural quarter is already recognised in the Local Plan at this end of The Broadway. The majority of this end of the Broadway area is located in the secondary shopping frontage where a wide range of uses are encouraged therefore a new policy is not required. Similarly, the creation of a Civic Hall in Wimbledon town centre and Wimbledon Way do not require policies. The Wimbledon Way is a heritage walk in and |

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| | comments on Policy DMEP1). | around Wimbledon town centre set up to celebrate the Olympics. There is a plan for this project with initiatives set out. Although the council does not intend to build a new Civic Hall; the site allocations in Wimbledon allow for this, should another party want to taken it forward. |
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| Site 63: 165-171 The Broadway | | |
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| Respondent | Comment | Officer recommendation |
| Think Future | Agree with the preferred use | Support for the allocation. No action needed. |
| Colebourne. S | Definitely should be redeveloped to continue this section of the Broadway. Building heights in line with other local buildings. Mixture of uses is acceptable here with perhaps sports on the ground floor. | Support for the allocation. Comments regarding site specific design matters and location of uses are not determined prior to the planning application. No action needed. |
| Conservative Group | Retail or office | The site is allocated for such uses. The final mix of uses will be considered by a future developer and determined by council when a planning application is submitted. No action needed. |
| Wimbledon Society | <p><i>Stage 3:</i> The site is in the cultural quarter and proposed uses should include culture and arts.</p> <p>The height should be no greater than the CIPD building opposite to avoid a canyon effect. Development should also maintain a gap with the adjoining building at 153-161 to avoid creating a solid frontage and retain sunlight through to The Broadway. The northern elevation should be parallel to the CIPD building. Tree planting in the forecourt should be encouraged.</p> <p>There should be no traffic access from The Broadway. There is potential for shared access from Southey</p> | The allocation includes the preferred uses suggested by the Wimbledon Society. The design related matters (including height) referred to will be considered and taken into account during the planning application process. Council is not specifying design related matters within the site allocations as this is considered to be more appropriately determined through policy interpretation through the planning application process. An active frontage will be required on this site as referred to in the allocation. It is acknowledged that access should not be permitted from The Broadway and this is referred to in the allocation. |

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| | Road serving properties to the west also. | |
| Stage 4: | | |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. We have infrastructure concerns regarding Waste Water capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |
| Wimbledon Society | The height of the southern street facade should be limited. Therefore: ADD to the Issues section a new second paragraph: "THE PRESENT GAP IN THE STREET FAÇADE SHOULD BE MAINTAINED, TO ALLOW ADEQUATE SUNLIGHT THROUGH TO THE BROADWAY. THE BUILDING SHOULD BE NO HIGHER THAN THE CIPD BUILDING NEARBY." Add to the Issues section final paragraph: "...congestion and road safety. CONSIDERATION SHOULD BE GIVEN TO PROVIDING SERVICE ACCESS ACROSS THE REAR OF THE SITE TO SERVE THE ADJOINING SITE 153-1 61. Mitigate and manage " | Not taken forward. Merton's Core Planning Strategy policy CS6 Wimbledon, supported by Merton's Tall Buildings Background paper, sets out the parameters for tall buildings along The Broadway, seeking a homogeneity of building heights to avoid the "gap toothed" effect that currently exists. The servicing requirements of this site should not be linked to issues or aspirations surrounding neighbouring site(s). Consideration of facilitating joint access could realistically only be considered if both sites were jointly developed. |
| Wimbledon Society | This site is within the "Culture and Arts" zone, identified in the Wimbledon Way report, and the street level uses should therefore be predominantly for Community, Arts and Leisure. As written, the open-ended nature of the list of potential uses allows a future developer to select only those that are currently commercially attractive. Additionally, this is a site that should be identified as a potential contributor to a town centre CHP scheme. (See comments on Policy DMEP1). | Not taken forward. As illustrated in Merton's Core Planning Strategy policy CS6 "Wimbledon" (c) and on the Wimbledon sub-area diagram, a cultural quarter is already recognised in the Local Plan at this end of The Broadway. The majority of this end of the Broadway area is located in the secondary shopping frontage where a wide range of uses are encouraged therefore a new policy is not required. Similarly, the creation of a Civic Hall in Wimbledon town centre and Wimbledon Way do not require policies. The Wimbledon Way is a heritage walk in and around Wimbledon town centre set up to celebrate the Olympics. There is a plan for this project with initiatives set out. Although the |

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| | | council does not intend to build a new Civic Hall; the site allocations in Wimbledon allow for this, should another party want to taken it forward. |
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| Site 64: 12 Ravensbury Terrace, Wimbledon Park | | |
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| Respondent | Comment | Officer recommendation |
| Colebourne .S | Any development must not restrict the main railway line, which may need to be widened from 4 tracks to 6 tracks. (An extra 2 tracks are definitely needed; however it may be cheaper to place them in tunnel than widen the surface railway). | The site is not subject to any railway safeguarding or proposal. No action needed. |
| The Wimbledon Society | This site and its neighbour to the south are significant employment sites providing excellent space for the knowledge-based and creative businesses. Such a location, within easy reach of central London clients, good accessibility to rail, and being close to a good local centre, encourages local regeneration and housing improvements (including within LB Wandsworth). | This accords with the allocation. The owner proposes to expand the existing office component on the site as well as provide residential use on upper floors. No action is needed. |

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| <p>Environment Agency</p> | <p>Not suitable for residential development. We do not believe that any mitigation measures can address the issues associated with the functional floodplain and with the critical drainage areas to minimise flood risk for future occupiers and the potential for water pollution from the site</p> <p>The River Wandle runs adjacent to Site 64 and Site 70, a culvert runs across the north east corner of Site 37, and the Beverley Brook runs to the west of the proposed Burlington Road Strategic Industrial Locations. Development at these locations should not prevent future river restoration or the achievement of WFD objectives. Developments affecting the water-bodies may also require WFD compliance assessment.</p> <p>Groundwater and Land Contamination: Secondary Aquifer, no SPZ. Adjacent to River Wandle. Will require Phase 1 Assessment for contamination potential, and Phase II Investigation if contamination known or suspected.</p> <p><i>Stage 3:</i> for residential to be acceptable we would need a clear indication from the council that they considered the wider benefits achieved by the development to outweigh the flood risk.</p> | <p>The representation received as part of the Stage 3 consultation is summarised below and is considered to be more relevant and up to date than this representation. The Environment Agency changed their position to acknowledge that mitigation measures can be explored for vulnerable developments. Any redevelopment would be required to meet existing and emerging local and national planning policy.</p> <p>As part of the representation received during the Stage 3 consultation, the Environment Agency accepted that residential uses could be provided on site, subject to meeting all the relevant criteria (such as impact and sequential tests) and local and national policy guidance. This information will be required to be presented as part of a planning application for the site. It would need to be demonstrated by the applicant that the need for housing was evident and that potential adverse impacts could be mitigated prior to being acceptable by the council and Environment Agency. This information is reflected in the allocation. No action is necessary at this point in time.</p> |
| <p>Natural England</p> | <p>No substantive comments to make. Natural England would welcome the opportunity to comment on in respect of their location or potential for green infrastructure opportunities in future.</p> | <p>No action needed. Natural England will be given the opportunity to comment on planning applications as requested.</p> |

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| London Borough of Wandsworth | Wandsworth council would wish to see caveats included to ensure that the preferred use (which includes new housing) would include sufficient mitigation measures to avoid any conflicts with the industrial uses which could prejudice continuing industrial use/viability of the industrial uses within the Wandsworth LSIA. | The allocation is for offices and residential. The scale of office expansion on the site is unlikely to have an impact on the neighbouring LSIA. In addition, caveats are not considered to be part of the process for preparing the Sites and Policies Plan. Wandsworth council will have the ability to comment further at the time a planning application is submitted once the scale and type of employment uses are known. No action is needed. |
| Conservative Group | Office: Should also clear the side of the river to create a walkway to join up with the Wandle trail. | The landowner has provided plans which show an increased office floor space as part of redevelopment as well as enhancing the rivers edge. There is insufficient space to establish a walkway due to buildings being up to the rivers edge both upstream and downstream of the site. |
| Wimbledon Society | <p><i>Stage 3:</i> The adjoining building could be a candidate for local listing.</p> <p>The river at this point has a very special sylvan and natural character. Buildings should be set back from the waters edge to enhance the green character. The creation of a riverside walk should be considered.</p> | <p>The reference to the adjoining building being considered for a local listing is not relevant to the process of preparing the Sites and Policies Plan.</p> <p>With regard to riverbank enhancement, the existing bank adjacent to the site is hard surfacing and channelised therefore making a green, natural bank difficult. This is a similar situation upstream and downstream of the site. However council has received</p> |

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| | <p>Consideration could be given to a new pedestrian/cycle bridge across the river.</p> <p>The suggested PTAL rating seems too low.</p> <p>Residential use is inappropriate given the site is within the functional floodplain.</p> | <p>information from the owner which suggests the adjacent riverbank will be opened up and enhanced as part of redevelopment, which is encouraged. The culverted stream is located adjacent to the northern boundary not within the site according to the Environment Agency.</p> <p>A new pedestrian/cycle bridge is currently the subject of a Sustrans viability proposal in this location and is referred to in the Policies Map as a potential new pedestrian bridge location (Transport proposal 24TN).</p> <p>The PTAL rating at the site was confirmed by TfL's PTAL calculator at webptals.org.uk at the time of writing. Any residential use on the site will be required to comply with policy regarding development in a flood risk area.</p> |
| Stage 4: | | |
| Wimbledon Society | Support for TN24. | No action needed. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
| Stone M | Support for the allocation. | No action needed. |

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| Site 65: Kenley Road car park | | |
| Respondent | Comment | Officer recommendation |
| Fisher I Rayner FandM | Concerned that development will have an adverse impact upon the quality of life and house prices on Daybrook Road. Issues raised include privacy, lighting, loss of open space, noise and opposition to any building larger than two storeys. A more | The car park has very low occupancy throughout the week. Council's property team has determined it to be surplus to requirements. The most appropriate alternative use for the site is considered to be residential based on the location, surrounding environment and need for housing in the borough. Site specific |

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| | <p>acceptable development would be for an extension to the park or as allotments. If residential development is to result it should be a combination of two storey development with additional green space that reduces impacts on Daybrook Road residents.</p> | <p>design related impacts will need to be quantified as part of any planning application to develop the site. The site will not be retained as a car park.</p> <p>The site was not submitted for designation as open space and does not meet the criteria for open space in the Sites and Policies Plan. In addition, there is a large amount of open space in the vicinity of the site such as Kendor Gardens adjoining the site, Merton Park and nearby Morden Hall Park. There is substantial evidence regarding the need for housing and schools in Merton and the borough has one of the highest percentages of open space in London. The need for housing and schools is considered to outweigh the need for additional open space or allotments, particularly in this location.</p> <p>Based on the evidence the site will therefore continue to be allocated for residential use.</p> |
| <p>Robinson M and W</p> | <p>Preference would be for an expansion of the adjoining recreation area. An alternative would be for an allotment area. Should justifiable reasons for the land to be built on exist, it should be residential only and in keeping with the existing typical family demographic. Development should also be sufficiently distanced from the Daybrook Road fencing to ensure no reduction in privacy. The height of new buildings should be single storey to blend into the existing green space, prevent overlooking into the adjoining properties and avoid shadowing effects.</p> | <p>The site will not be retained as a car park. The site was not submitted for designation as open space and does not meet the criteria for open space in the Sites and Policies Plan. In addition, there is a large amount of open space in the vicinity of the site such as Kendor Gardens adjoining the site, Merton Park and nearby Morden Hall Park. There is substantial evidence regarding the need for housing and schools in Merton and the borough has one of the highest percentages of open space in London. The need for housing and schools is considered to outweigh the need for additional open space or allotments, particularly in this location.</p> |

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| | | The scale of any built form will be considered at the planning application stage in more detail. Any development on the site will be required to design and mitigate against potential effects such as overlooking and shadowing. This information will be taken into account. |
| NHS South West London | We consider this to form part of the Morden Town Centre area and comments made in our last submission remain. There is a need to develop modern healthcare facilities in Morden town centre part funded by developers to support the new population. The site could be at a redevelopment Morden road or on an accessible new development site. | Refer below to the most recent representation from NHS received during the Stage 3 consultation. Modern healthcare facilities are allocated as part of Site 24 as proposed by the NHS. No action needed. |
| Colebourne S | Support intensification of residential development around all existing railway stations in Merton, including this one. Would support "encouragement" or compulsory purchase to enlarge the site to form a more unified development. | Support for the allocation. No action needed. |
| The Wimbledon Society | Being within the Morden Masterplan area, there should be no ad hoc decisions on any sizeable sites such as this until that masterplan has been produced. | The site is being considered as part of the moreMorden masterplan. This will ensure no ad hoc planning decisions are made regarding development of the site. No action needed. |
| Natural England | Recommend that some reference is made to the views in and out of Morden Hall Park to be respected. | The allocation was amended to include reference to Morden Hall Park. |
| Conservative Group | Commuter car park, but subject to wider masterplan. | The parking survey undertaken in 2012 showed that the car park was very underutilised. |
| Protect Dundonald Rec | Stage 3: Support for inclusion of education in allocation. | No action needed. |
| Rayner F and | Stage 3: concern over existing lighting used during | Design matters regarding scale, bulk and massing will primarily be |

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| M | <p>the night when the site is vacant with regard to light pollution and security. Preference for the site not to be developed due to loss of open space. Should development be allowed their preference would be for development to be keeping in scale with existing houses (i.e. not the adjoining flats) and seek to extend the park where possible. There is also demand for allotments in the area.</p> | <p>considered as part of a planning application to redevelop the site. Due to its size and location the site is considered suitable for residential use. There is also an overwhelming demand for housing and schools in London and Merton. It is considered that there is sufficient space on the site in which to develop an appropriate residential development whilst respecting the residential amenity of adjoining and nearby properties, and mitigating potential effects on privacy, overlooking, daylight, light pollution and other matters. It is acknowledged that the surrounding area is predominantly comprised of two storey residential terraced houses, with the exception of the adjoining Naish House, and that it is likely it will be appropriate to continue this form of development on the site. Any alternative proposal would need to address numerous constraints such as design, privacy, overlooking, and daylight/shadowing effects among others such as its context in the wider environment as part of an application. It is considered that a terraced house development would mitigate potential effects, subject to appropriate scale and siting of buildings and that any alternative residential development would have to have specific regard to the issues raised.</p> |
| NHS | <p><i>Stage 3:</i> NHS Primary Care advisor confirms that there is sufficient capacity in existing NHS clinics to cater for demand when taking into account the allocated sites for development. Anticipated timeframes for disposal were also provided. General support for the allocation.</p> | <p>No action needed.</p> |
| <p>Stage 4:</p> | | |
| GLA | <p>The site should be required for a bus stand.</p> | <p>Further comments received from TfL on 17 September 2013 (after the consultation period) stated that they wish to withdraw previous comments made regarding the bus standing space on the site.</p> |
| GLA | <p>The site appears to be within 50 metres of London</p> | <p>The text in the site allocation will be amended to refer to the</p> |

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| | Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted. | requirement. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |

| Site 69: Sibthorp car park | | |
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| Respondent | Comment | Officer recommendation |
| Wimbledon Society | There should be no decision should be pre-empted for this site, until the overall Plan for Mitcham Fair Green has been produced. | The allocation states that development of the site will only occur following implementation of the Rediscover Mitcham project. No action needed. |
| Conservative Group | Support preferred option- Restaurant /café and residential | Support for the allocation. No action needed. |
| Mitcham Village Residents Association | <i>Stage 3:</i> It was submitted that the allocation is too vague. | The allocation for a range of town centre type uses will ensure that appropriate town centre type uses (in accordance with the Core Planning Strategy definition) will predominate on site. Residential uses on upper floors are acceptable as part of a mixed use development. The allocation will also allow flexibility following the implementation of the Rediscover Mitcham project. |
| Wimbledon Society | <i>Stage 3:</i> mention the importance of creating a proper frontage to Holborn Way. | The importance of an active frontage is provided in the allocation and will be subject to further scrutiny as part of a planning application. Redevelopment of this site will occur following the Rediscover Mitcham project which is investing c£6.2m to redevelop the public realm in Mitcham town centre. |
| Stage 4: | | |

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| GLA | This site includes London buses driver facilities and toilets and any redevelopment of this site must maintain or replace these facilities. TfL requests that the policy wording includes safeguarding of these facilities in accordance with London Plan Policy 6.2 and the Land for Industry and Transport SPG. | The text will be amended in accordance with the suggestion. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 70: Haslemere Industrial Estate | | |
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| Respondent | Comment | Officer recommendation |
| Rosoman J | Support for the suggested use for residential by the owner. They are an adjoining landowner and outlined concerns with the existing industry such as noise, odour, hours of operation, heavy vehicles, and the nature of the asbestos clad buildings affecting him and his property. | The protection of scattered employment sites is backed by existing and proposed policy. The landowner seeks an employment led mixed use redevelopment of the site with B uses suitable in a residential area to be dominant. The site is not considered entirely suitable for residential based on the nature of the adjoining employment uses, the flood risk, and requiring protection of the existing led nature of the site. Council is not opposed to residential use being part of a redevelopment however this will be subject to meeting policy, most particularly flood risk. The site is therefore not considered suitable for a solely residential development and the allocation will be retained as an employment led redevelopment. |
| Colebourne S | Any development must not restrict the main railway line, which may need to be widened from 4 tracks to 6 tracks. (An extra 2 tracks are definitely needed; however it may be cheaper to place them in tunnel than widen the surface railway). | There is existing land safeguarded for Crossrail1 and expansion to the district line. Any development will have to acknowledge these designations and not restrict them. No action needed. |

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| The Wimbledon Society | For reasons of floodplain, retaining local employment, encouraging growing commercial businesses, high grade river bank character and amenity, no housing should be accepted as appropriate or desirable for this site. Whether there is possibility of creating a riverside walk under the rail bridge could be examined. The Council's preferred business use is favoured. | Support for the allocation. No action needed. |
| Natural England | Welcome the opportunity to comment on in respect of their location or potential for green infrastructure opportunities | No action needed. Natural England will be given the opportunity to comment on planning applications as requested. |
| London Borough of Wandsworth | Whilst contiguous industrial use is acknowledged in new Site 70 (Haslemere Industrial Estate), it is considered that this should also be acknowledged for Site 64 (12a Ravensbury Terrace) which abuts a Locally Significant Industrial Area (LSIA) in Wandsworth. The Council would wish to see caveats included to ensure that the preferred use (which includes new housing) would include sufficient mitigation measures to avoid any conflicts with the industrial uses which could prejudice continuing industrial use/viability of the industrial uses within the Wandsworth LSIA. Potential implications of a proposed width restriction on Ravensbury Terrace preventing HGV access to the industrial estate were also raised outside the formal consultation stages by the London Borough of Wandsworth between late 2012 and April 2013. | The allocation is for an employment led redevelopment which may include alternative uses. Caveats are not considered to be part of the process for preparing the Sites and Policies Plan. Wandsworth council will have the ability to comment further at the time a planning application is submitted once the scale and type of employment uses are known. No action is needed. Wandsworth council resolved at a cabinet meeting on 23 April 2013 that the width restriction would not be imposed but HGV movements to and from the site would be monitored on an on going basis. |
| Environment Agency | The consultation document acknowledges that these sites and their surroundings are within the functional | It is acknowledged that the site is identified within the functional flood plan (flood zone 3b) according to Environment Agency |

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| <p>floodplain of the river Wandle (Flood Zone 3b). The sites are also within critical drainage areas for surface water flooding. As mentioned above these sites are also critical for the delivery of the Wandle Catchment Plan and the proposed Wandle Valley Regional Park.</p> <p>These sites are not suitable for residential development. We do not believe that any mitigation measures can address the issues associated with the functional floodplain and with the critical drainage areas to minimise flood risk for future occupiers and the potential for water pollution from the site.</p> <p>The River Wandle runs adjacent to Site 64 and Site 70, a culvert runs across the north east corner of Site 37, and the Beverley Brook runs to the west of the proposed Burlington Road Strategic Industrial Locations. Development at these locations should not prevent future river restoration or the achievement of WFD objectives. Developments affecting the water bodies may also require WFD compliance assessment.</p> <p>Groundwater and Land Contamination: Secondary Aquifer, no SPZ. Industrial setting. Will require Phase 1 Assessment for contamination potential, and Phase II Investigation if contamination known or suspected.</p> <p><i>Stage 3:</i> Support for employment led redevelopment as opposed to residential as suggested by the owner. While the site lies within the functional floodplain they are happy to discuss redevelopment of the site within</p> | <p>modelling. Anecdotal evidence suggests that the site has not flooded since it has been occupied by one of the current owners (1975 – Anglo Austrian Patisserie) and likewise for the adjacent site to the north (Site 64 12a Ravensbury Terrace). The Environment Agency acknowledged that some sites within the functional flood plain can be developed, provided they meet the required criteria regarding sequential tests, mitigation and modelling to be determined as part of a site specific flood risk assessment (Stage 3 representation). The agency stated that they would largely rely on existing and proposed council policies to adhere to these criteria. This information would therefore need to be prepared and submitted as part of a planning application to redevelop the site. It is considered that the site can be appropriately developed, subject to meeting these criteria, and that at-risk uses would need to be situated above the flood level (plus freeboard) and also have appropriate emergency access.</p> |
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| | its existing vulnerability classification. Any redevelopment should not lead to an increase in built footprint which could result in a loss of flood storage. | |
| Conservative Group | Business/light industrial : Should also clear the side of the river to create a walkway to join up with the Wandle trail | The allocation seeks an employment led redevelopment of the site. There is insufficient space to establish a walkway due to buildings being up top the rivers edge both upstream and downstream of the site. No action needed. |
| Astranta Asset Management | Stage 3: Further support for allocation and redevelopment. | Support for allocation. No action needed. |
| Wimbledon Society | <p>Stage 3: The river at this point has a very special sylvan and natural character. Buildings should be set back from the waters edge to enhance the green character. The creation of a riverside walk should be considered.</p> <p>The suggested PTAL rating seems too low.</p> <p>Part of the site is required for safeguarding for rail purposes. Remediation works following this should provide a high quality riverbank.</p> <p>Residential use is inappropriate given the site is within the functional floodplain.</p> <p>Offices and creative industries would be appropriate. School use could also be added to the list.</p> | Design related aspects will be considered during the planning application process. The river is constricted both up and downstream of the site by built development. The PTAL rating at the site was confirmed by TfL's PTAL calculator at webptals.org.uk at the time of writing. Any residential use on the site will be required to comply with policy regarding development in a flood risk area. The rail safeguarding area has been confirmed as being adjacent to the site and only covers a small portion of the southeast corner. If any rail works were undertaken they would not be the responsibility of the landowner. Offices and creative industries are provided within the allocation and can be provided. |
| Stage 4: | | |
| Astranta Asset Management | General support for the allocation. Residential use should be provided. The reference to safeguarded land should be removed. | General support for the allocation. The future mix of uses will be subject to meeting policy, evidence and consultation as stated in the allocation. Regarding the rail designation, it refers to existing safeguarding for the original Crossrail 2 (Wimbledon Hackney line) |

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| | | designation. Current directive from TfL states that this cannot be amended until such time that the new safeguarding maps have been produced, therefore it must remain on the Policies Map. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
| Mallon M | Objection to residential use. | The owner has suggested that residential uses be included in the allocation. The council is not allocating the site for residential uses for several reasons. The primary reasons are that the site is an established scattered employment site with a range of industrial, manufacturing and office uses operating on the site and adjoining properties. The site is also within flood zone 3b which affects residential development. It is preferred that the site is retained as an efficient scattered employment site and if redeveloped, for an employment led redevelopment to predominate. If a residential element was proposed as part of a redevelopment the potential impacts on local infrastructure would be considered at the time a planning application is made and would also be subject to relevant s106/CIL charges to offset the impacts of additional demand created. |

| Site 74: Southey Bowls Club | | |
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| Respondent | Comment | Has the change been Implicated |
| Ashmean J Biddlecombe P Boothroyd – Brooks C Brownsmead J Collini. A | The following represents a general summary of the issues raised as part of consultation: Parking, traffic, access and road safety issues <ul style="list-style-type: none"> • Parking issues associated with bowling club events and construction pre and post | <i>Parking, traffic, access and road safety issues:</i> The bowling clubs intention is to redevelop the car park portion of the site which currently provides space for approximately 35 vehicles. The bowling club has approximately 200 members and caters for events of up to 400 people, but much smaller events on |

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| <p>Fischer. P Frost Pand C McFarlane F.R Mitchell A.R Murray. B Siegle. D Tipper M Watts. L Wyatts. L Barnes. S</p> <p><i>Stage 3:</i> Fischer P Hopkins B Kho L Plant J Than E Watts L</p> | <p>development;</p> <ul style="list-style-type: none"> • The existing on-street parking supply in the vicinity of the site is considered to already be insufficient; • The access to the site is too narrow and too close to the intersection with Kingston Road; and • Access for emergency vehicles to the site. <p>Loss of open space, overlooking, privacy, daylight</p> <ul style="list-style-type: none"> • Loss of open space from surrounding residential properties; • Potential daylight, privacy and overlooking issues; • The site is designated open space; and • Potential noise effects. <p>There is a lack of infrastructure in the area, particularly schools and healthcare facilities.</p> <p>The potential impact on house prices.</p> <p>Availability of the site and access to the site.</p> <p>Loss of sport/leisure activity.</p> | <p>a regular basis. It is therefore clear that the bowling club does not provide parking for all vehicles likely to access the site. The club intends to remain on site in the same capacity and develop the car park area for residential use. The actual effects relate to displacement of the existing parking provided on site and the demand created from any residential units created. It is considered that some provision for onsite parking in any redevelopment should be provided for the residential units and club as much as possible. Other vehicles would either be displaced onto the surrounding road network or have to find alternative methods of accessing the site (such as public transport, car sharing etc). A maximum of 35 vehicles would be displaced and no change to existing traffic patterns would result (i.e. the change in number of vehicle movements is negligible and the only increase would relate to the residential units). Any displacement of car parking from the site would need to be mitigated. It is possible that funding from the club for consideration of a CPZ may be appropriate and/or the implementation of an appropriate travel plan.</p> <p>With regard to traffic, access and road safety issues raised, overall the development will not result in a measurable change to the existing environment. The addition of some residential units is not going to generate measurable impacts on the surrounding or wider road network. The bowling club will be retained in its current capacity therefore the status quo will remain.</p> <p>Regarding access to the site, the existing access is approximately</p> |
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| | | <p>3 m wide adjacent the houses on Lower Downs Road, but is of sufficient width for emergency vehicles. It also represents the existing situation and ultimately would not change significantly following any redevelopment of the site. For example, the car park at present is used temporarily parking area for council transport vehicles including 20 seat buses. There is unrestricted visibility along the access so any conflict between oncoming traffic would be temporary and minor in nature.</p> <p><i>Loss of open space, overlooking, privacy, daylight:</i></p> <p>Firstly, the site was incorrectly draughted during the Stage 2a consultation with an open space designation on the site. This was corrected and removed as part of Stage 3 consultation. However, following this, members made a decision that the existing bowling green should be designated as open space. This was amended and included in the allocation. The issues raised regarding a loss of open space from adjoining properties is not considered to be an issue as it has not been designated as such. The level of protected open space as part of the allocation is being increased. The site is privately owned and it is a luxury that adjoining owners have an open space aspect across the site. It is deemed to be a perceived open space and not a right in this instance.</p> <p>Potential effects relating to daylighting, privacy and overlooking cannot be defined until the building bulk and location is known. It is considered that the site only has capacity for a limited number of residential units, of which one primary consideration would be maintaining an appropriate separation from adjoining properties. A</p> |
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| | | <p>suitable separation to ensure there were no adverse effects of daylighting, overlooking and noise would need to be achieved. As a result, it is considered that only a small portion of the site in the vicinity of the existing car park is suitable for residential development. This restriction on a suitable location for residential development, coupled with appropriate mitigation regarding design matters at the time a planning application is made is considered sufficient to ensure the potential effects resulting from development are no more than minor.</p> <p>Some concerns were also raised regarding the potential dual use including a redeveloped club house being used for community purposes also. The existing club house is already available for this purpose therefore it will not change. If the size or location of the club house was to change, the actual impacts of this change would need to be quantified and considered appropriately. The extent of such development is unknown at this point in time, however it is considered that it can be taken into account as part of the planning application and appropriate mitigation measures implemented.</p> <p><i>Lack of infrastructure:</i> Several representations referred to a lack of infrastructure in the area, predominantly for schools and healthcare facilities. Redevelopment of the site is not likely to place any significant additional pressure (which may or may not exist) on existing services due to the small scale of the development which is considered suitable for the site. In addition, any planning permission would require Section 106/CIL contributions to be</p> |
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| | | <p>made to offset adverse effects of additional demand created.</p> <p><i>Impact on property values:</i> No evidence was submitted to suggest that redevelopment of the site would negatively impact on property values in the vicinity. The value of the property is unlikely to be significantly affected by the small scale development envisaged and is also not a relevant planning consideration to be taken into account by council.</p> <p><i>Availability of the site and access to the site:</i> Several representations stated that there were restrictive covenants on the site preventing any such development and that access to the site was not legally available to any successors in title. Council sought clarification regarding these matters as a result. The bowling club has confirmed that they sought legal advice regarding the matter, and that the current proposal to redevelop a portion of the site does not conflict with any covenant, and that appropriate legal access to the site and any redeveloped portion is available without restriction.</p> <p><i>Loss of sport/leisure activity:</i> Several representations were made concerning the loss of the sporting/leisure activity which exists on site. Since these representations were made, it has been clarified by the club that it intends to remain on site in its current capacity. It is considered that there is no material effect or loss of any sporting/leisure facility. With reference to the loss of the nearby Dundonald bowling club through a recent planning application, it is</p> |
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| | | <p>understood that that club had approximately 13 members at the time of closure therefore a significant influx of members (and thus users of the site) to Southey Bowling Club as claimed will not result.</p> <p>Therefore based on the information above the site will remain with its residential and open space allocation.</p> |
| Colebourne S | A small residential development would appear to be suitable on this site, of semi-detached or town houses, rather than flats | Support for the allocation. No action needed. |
| The Wimbledon Society | Introducing housing into the site would be contrary to Plan policy that protects open spaces, and should not be accepted. However, open air Bowls clubs by definition operate during the summer months, with winter being largely given over to such social activities as can be supported by the Clubhouse etc. Such facilities at this site appear to be very limited, and instead of adding in housing consideration could be given to enhancing the present indoor accommodation to provide a wider social/recreational amenity for the locality as well as the Club members. | The site contains both open space and residential allocations. The bowling club has expressed a desire to provide an enhanced clubhouse facility that was available for alternative community uses. The representation conforms to the allocation. No action is needed. |
| Conservative Group | Sports club only. Residents tell us there is a covenant on this land that prevents its use for anything other than sport. | The bowling club will be retained in its existing capacity and the club has a desire to enhance the facility as part of the allocation. The club has confirmed they have obtained advice stating the site is available and no restrictive covenants exist. |
| Wimbledon Society | <i>Stage 3:</i> The open space should be designated in the allocation. | The allocation was amended to include the bowling green as open space. No action needed. |
| <i>Stage 4:</i> | | |
| Wimbledon Society | As the whole of this site is currently a Bowls Club (page 321), it should all be classed as open space, not just the actual playing green. (see site PO38, page 283). The | Not taken forward. The bowling green is proposed for open space designation. The car park and existing clubhouse are proposed for allocation for residential development by the Bowls Club themselves, in |

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| | Policies Map should be amended accordingly. | order to support continued financial sustainability of the club. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |
| Sport England | The site contains an existing sporting use. Objection to any loss of sports facilities. | General support for the allocation which includes the ability to establish sports facilities as well as containing existing sports facilities. |

| Site 75: Former Mitcham Gasworks | | |
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| Respondent | Comment | Officer recommendation |
| Colebourne S | This major site would be suitable for residential development however it is too remote from good public transport access to key centres, including Wimbledon, Croydon and London. This site also represents a key potential route for Tramlink to access central Mitcham, via Hallowfield Way and Miles Road. | Support for the allocation. Public transport enhancements will be considered as part of the planning application process. No action needed. |
| National Grid Property/Scotia Gas Network | Reasonable flexibility is required to allocate the site for higher value uses, to promote the successful regeneration of the site and ensure that any proposed redevelopment is financially viable. Therefore, we request that the draft site allocation identifies the potential for residential and retail uses, subject to the decommissioning of the gasholder, evidence of financial viability and (where necessary) a retail impact assessment. | Following further discussions with the owner (National Grid Property/Scotia Gas Network) the allocation was amended to be a residential led redevelopment with open space and some community use. No action needed. |
| Mayor's Office for Policing and Crime/Metropo | Development of the site may have an impact on policing needs. It was recommended that the site allocation be amended to include for community facilities such as policing. | More recent correspondence from the consultants acting on behalf of the MPS have been in contact with council regarding the police estate in the borough. A review of the entire police estate in Merton has resulted in the change of some facilities, and the |

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| litan Police Service | | closure of one existing centre. No additional resources have been identified as being necessary. It is based on this more recent correspondence that council considers appropriate review of policing needs has been undertaken. It is noted that the allocation includes potential for community uses. In addition, community and infrastructure needs will also be considered at the time a planning application is considered through the appropriate s106/CIL methods. It is therefore considered that no action is necessary in relation to this representation. |
| Conservative Group | Proposed uses will depend on decommissioning of the gasholder | Development of the site is dependent on the decommissioning of the gasholder and the allocation reflects this. The site previously had planning permission for an employment led development on the site however this was not viable and thus not developed. The most suitable use given the sites size and location is considered to be for a residential led redevelopment. The site will make a significant contribution toward Merton's housing targets. No action needed. |
| National Grid | <i>Stage 3:</i> acknowledgement that the site is in the vicinity of National Grid infrastructure and that development should take this into account. | The allocation refers to the National Grid infrastructure. No action needed. |
| National Grid Property/Scottia Gas Networks | <i>Stage 3:</i> support on behalf of owner, however it should not required to be delivered via a planning brief. | No action needed. A planning brief is considered necessary in this instance due to the unique constraints and development costs associated with it. It is necessary to guide delivery of the site to ensure a viable development can be delivered. |
| Wimbledon Society | <i>Stage 3:</i> The open space should be designated in the allocation. | The allocation was amended to include the bowling green as open space. No action needed. |
| Stage 4: | | |
| National Grid | Support for the reference to National Grid infrastructure. | No action needed. |
| Thames Water | We have concerns regarding Water Supply Capability in relation to this site. On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. On the | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In |

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| | information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. | accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided." |
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| Site 77: 26 Bushey Road, Raynes Park | | |
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| Respondent | Comment | Officer recommendation |
| Colebourne S | Site would appear to be too restrictive in size and shape for a residential development. If a significant section of the properties along Kingston Road were developed at the same time, then the site would have suitable size and integrity | The site is a similar shape to the adjoining residential development within the Apostles residential area. The adjoining properties are not available for development. Based on this information it is considered that a suitable residential development can be established on site. |
| The Wimbledon Society | This site is in the main used by the automotive trades. Being long and narrow, it is unsuited to the proposed housing use, with the need for an access road, space around the dwellings, and the need to keep any development low in height, to protect the privacy of the rear gardens of surrounding houses. Instead, it provides an opportunity for a range of small scale commercial/studio type business uses, geared towards the knowledge-based firms | The site is considered suitable for residential development for the following reasons: <ul style="list-style-type: none"> • There is an overwhelming demand for housing in the borough which is considered to outweigh the benefits of continued B1 use on this site; • The surrounding area is characterised by residential development; • Permission was granted for 11 industrial units which lapsed due to a lack of demand to implement the development. Redevelopment for continued B1 use has been proven to not be viable through marketing evidence and the failure to implement the approved redevelopment for B1 use; • Continued B1 use is not desirable by council as evidenced by the refusal to grant planning permission which was only granted on appeal; and |

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| | | <ul style="list-style-type: none"> The existing tenants on the site are all operating on one month rolling leases which can be terminated and vacated at short notice. This is considered to contribute significant to the high occupancy as it is likely to draw demand for very low rents only. |
| <p>Dove. T andK Fischer P Lund C Campion L Marti H McGowan. I Mr and Mrs Jones Rajagopalan. S Barnes. S Brownsmead .J Plant J</p> | <p><i>Strongly object to residential at this site adjacent to our properties for the following reasons:</i> There would be severe issues with overcrowding, noise, space and a real invasion of privacy. The site is too small for residential. The development would restrict sunlight. Parking would also present a major issue. Present existing use pose little disturbance. The site should provide employment only. New development would mean potential lose of trees. Increasing residential would increase school pressures schools. We don't have enough infrastructures within the borough.</p> | <p>Issues were raised from various parties which can generally be summarised as follows:</p> <ul style="list-style-type: none"> Loss of open space from surrounding residential properties; Potential daylight, privacy and overlooking issues; The site is designated open space; and Potential noise effects. <p>The site is not considered to positively contribute to open space given that it comprises a developed site with B1 light industrial uses active on the site. The perception of open space relates to the fact that the existing buildings are single storey and views can be obtained over top of the existing buildings from adjoining properties. There was an approved planning permission, which has since lapsed, for a redevelopment of the site to provide an enhanced B1 service. The permission enabled 11 two storey industrial units located adjacent the eastern boundary. It is considered that there is a precedent regarding the appeal granted on the site (with regard to bulk and massing only) which is considered relevant in this case. However, the bulk and location of buildings are not known at this point in time. It is more appropriate for matters such as the loss of open space,</p> |

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| | | <p>daylighting, shadowing, overlooking and privacy to be considered through the planning application process when effects on adjoining properties can be quantified. It is considered that the site only has capacity for a limited number of residential units of no greater density than the surrounding area, of which one primary consideration would be maintaining an appropriate separation from adjoining properties. A suitable separation to ensure there were no adverse effects of daylighting, overlooking and noise would need to be achieved. For comparative purposes, the surrounding apostles residents association area has a density of approximately 59.35 units per ha. Converting this to the subject site would result in the site being able to accommodate 19.5 units, ignoring design aspects at this point in time.</p> <p>It is therefore considered that appropriate mitigation of these measures can be taken into account and implemented during the planning application process.</p> |
| Gregory J | <p>More and more housing is being built without accompanying amenities like better drainage, schools, health provision and open spaces, not to mention car parking facilities. Schools being replaced by housing, open spaces replaced by housing and no major drainage improvements so we still have flooding under Raynes Park Bridge when it rains heavily</p> | <p>The NHS has confirmed to the council in their representation that sufficient healthcare facilities exist in the borough. The council is actively investigating additional primary school places in this region of the borough as evidenced in an external report commissioned by the council and published in late 2012. The site does not meet the criteria for open space therefore was not considered for this use. With regard to parking and traffic The site currently accommodates a range of B1 uses with varying needs for vehicular access. Overall it is considered that redevelopment for an appropriately scaled residential development will reduce the total number of vehicles movements into and out of the site.</p> |

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| | | Subject to the provision of appropriate access, onsite parking and manoeuvring, it is considered that the potential effects of redevelopment on parking, traffic and access will be reduced compared to the existing situation. |
| Environment Agency | Groundwater and Land Contamination: Secondary Aquifer, no SPZ. Has a former petrol filling station and vehicle repair businesses on site. Will require a Phase II investigation to assess whether remediation is required | This information is referred to in the allocation. No action needed. |
| Conservative Group | School or retain as is. | The site was assessed in an external report commissioned by the London Borough of Merton for its suitability as a school but was rejected on grounds of size, access and contamination issues. Regarding the retention of the site for industrial uses, the reasons why the site is considered suitable for residential instead of industrial was outlined above. |
| Fischer P | <p>Stage 3: the government proposes that all development should be sustainable. It is unsustainable to keep proposing residential development on private open space which leads to increased commuters to fewer public and private facilities. This in turn increases travel by car or public transport which increases energy consumption and pollution, making it difficult if not impossible to meet government targets for reducing energy use and pollution.</p> <p>There is a demand for industrial land uses such as the site provides and the existing tenancy levels demonstrate this. Freezing them out will force them to less visible locations which inconveniences operations. Planning policy should recognise that such uses are necessary. The primary consideration</p> | <p>Site specific sustainability matters will be considered at the time a planning application is submitted. The NPPF states that brownfield land will be developed first in a sustainable manner. This site is considered to be an appropriate brownfield redevelopment proposal. The potential impacts of residential development in relation to offsite effects will also be considered at the time a planning application is submitted.</p> <p>The site is in private ownership and draws low rents due to the nature of the site and that only one month rolling contracts are offered. This leads to high occupation rates experienced on site. The site had planning permission to redevelop the site for an enhanced industrial development however this lapsed due to a lack of interest. This is more accurate, recent evidence of demand for industrial uses on the site. The site has also recently been sold to a developer therefore the future of these uses cannot be</p> |

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| | for a change of use should be for community use. The surrounding area has been identified as deficient in open space. | guaranteed. Merton's planning policies (in particular DM O1) address open space matters in line with the NPPF and London Plan. |
| Quod | Stage 3: support for the allocation. | No action needed. |
| Stage 4: | | |
| Wellsborough Developments Limited | Support for the allocation. | No action needed. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

| Site 78: 191-193 Western Road | | |
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| Respondent | Comment | Officer recommendation |
| Colebourne S. | This site would be suitable for residential development; however it is relatively distant from Colliers Wood station and primarily served by bus. | The site is considered suitable for residential development regardless of the public transport accessibility. Transport related matters including the amount of onsite parking will be considered as part of the planning application process. |
| Environment Agency | These sites are within Critical Drainage Areas and therefore there is a need for development proposals to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area. Groundwater and Land Contamination: Secondary Aquifer, SPZI. Industrial use. Will require Phase 1 Assessment for contamination potential, and Phase II Investigation if contamination known or | This information is referred to in the allocation. No action needed. |

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| | suspected. | |
| Natural England | Green corridor and potential for protected species along boundary of site | This comment appears to have resulted from an error in the drafting of the Sites and Policies Plan which states the impact of any development would need to take into account protected species, biodiversity and the adjacent green corridor. The site does not adjoin any green corridor nor is there one in the immediate vicinity. This reference was removed from the allocation accordingly. |
| Conservative Group | Mixed use residential, office and retail | The site is an out of centre location and not considered suitable for office and retail development which are more appropriate in town centres. Residential use is allocated and considered the most appropriate use for the site. |
| Davies D | <i>Stage 3:</i> development should not be more than two storeys. Blocks of flats, and their inherent issues, would not be desirable or wanted. They would be too high a density and congestion issues would be exacerbated along Western Road. Any development abutting the gardens of properties on Church Road needs to be sympathetic to the surrounding properties. There are no overlooking or noise issues from the current use. | It is considered acceptable for any new development adjoining existing properties to have an appropriate design which has regard to the scale and location of adjoining properties. In this instance, there should be some separation provided to the existing properties on Church Road to ensure new development is in keeping with the surrounding environment. Site specific design related matters will be determined and considered as part of the planning application process where further public consultation will be undertaken. |
| National Grid | <i>Stage 3:</i> acknowledgement that the site is in the vicinity of National Grid infrastructure and that development should take this into account. | The allocation refers to the National Grid infrastructure. No action needed. |
| Williams C | <i>Stage 3:</i> development should not be more than two storeys to avoid overlooking. Blocks of flats would be too high a density, congestion issues would be exacerbated along Western Road, and increased noise pollution. Any development abutting the | It is considered acceptable for any new development adjoining existing properties to have an appropriate design which has regard to the scale and location of adjoining properties. In this instance, there should be some separation provided to the existing properties on Church Road to ensure new development is |

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| | gardens of properties on Church Road should be sympathetic to the surrounding properties. There are no overlooking or noise issues from the current use even though it is unsightly. | in keeping with the surrounding environment. Site specific design related matters will be determined and considered as part of the planning application process. |
| Stage 4: | | |
| Cantor L | Support for the allocation. | No action needed. |
| National Grid | Support for the reference to National Grid infrastructure. | No action needed. |
| Thames Water | On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site. | The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services." |

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| Site 80: Crusoe Road Industrial building (45a and b Crusoe Road, Mitcham) | | |
| Respondent | Comment | Officer recommendation |
| Environment Agency | These sites are within Critical Drainage Areas and therefore there is a need for development proposals to incorporate suitable mitigation measures to address the issues associated with the Critical Drainage Area. Groundwater and Land Contamination: Secondary Aquifer, SPZII. Industrial use. Will require Phase 1 Assessment for contamination potential, and Phase II Investigation if contamination known or suspected. | This information is referred to in the allocation. No action needed. |
| Conservative Group | Light industrial | The subject site comprises several light industrial units in a predominantly residential area. The units are in relatively poor condition and when considered with adjoining land at 60 Pitcairn |

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| | | <p>Road, form a relatively derelict part of the street scene. The sites have also been the subject of numerous complaints to council's environmental health team regarding fly tipping and other issues. The site was submitted for residential use by local councillors and supported by the owners of the site. Council officers also support the proposed use as residential based on the nature of the site and surrounding area, and knowledge of residents' opinions regarding the existing site and operations. The suggestion to retain light industrial use was submitted by the Conservative Group. No evidence or supporting information was included as part of the representation. Ultimately, there are no measures that could overcome the concern raised without removing the site from the Sites and Policies Plan. The need for housing in the borough and the benefits of allocating sites for residential use, particularly in residentially prominent areas such as the subject site, is considered to outweigh the effects of the loss of small scale employment in this instance. Council therefore considers that an allocation for residential use on this site is the most appropriate land use to assist in meeting Merton's housing targets.</p> |
| Wimbledon Society | <p>Stage 3: has consideration been given to providing pedestrian access through the site in conjunction with Site 18.</p> | <p>The site is considered too narrow and of a peculiar shape to provide suitable pedestrian access through the site. They are also physically separated from each other. Additional land would be required in between.</p> |
| Stage 4: | | |
| Thames Water | <p>On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.</p> | <p>The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</p> |

Annex 1 – Sites not carried forward in the plan

| Site number, name, ward | Reason for recommending not to allocate the site in the DPD |
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| Site 4: Bond Road Day Centre, Mitcham CR4 3HG | The site will continue to be used as a day centre therefore, is no longer allocated as a potential site for new use. |
| Site 6 Durnsford Road Corner, Land C/O Gap Road SW19 8JF | The site will remain a small park. |
| Site 7: Gifford House, 67c St Helier Avenue SM4 6HY | The site will continue to be used for council offices. |
| Site 10: Morden Assembly Hall, Tudor Drive Morden SM4 4PG | The site is not deliverable within the timeframe of the plan. |
| Site 12: Queens Road Car Park, Queens Road Wimbledon SW19 8LR | Council has been advised that the site is actively being considered for a potential above ground work site for Crossrail 2. This is likely to lead to safeguarding in early 2014 therefore; the site is not available for redevelopment. |
| Site 16: Wimbledon Library/Marlborough Hall, SW19 7NB | Due to the number of responses received in opposition to the allocation it was not considered appropriate to allocate the site in the plan. |
| Site 19: Nelson Hospital (including car park), 220 Kingston Road, Raynes Park London SW20 8DB | Planning permission was granted on 6 th September 2012 for a hospital and a care home on this site location therefore, the site has been removed from this DPD. |
| Site 27: Merton Hall, 78 Kingston Road, Wimbledon SW19 1LA | The site will continue to be used for community purposes. |
| Site 30: Land adjacent 10 Home Park Road, Wimbledon Park, sw19 | Following comments from the public consultation results and further evidence based research by the council the council intends to protect this site as open space. |
| Site 38: Thames Water Site, Byegrove Road, Colliers Wood, SW19 2AY | Thames Water advised that they are unable to provide sufficient information regarding the deliverability of the site within the timeframe of the plan. Therefore, the site has been removed from the DPD. |
| Site 49: Wimbledon Delivery Office, 12 Cranbrook Road, Wimbledon SW19 4HD | Royal Mail has informed the council they have no plans to now dispose or relocate their operations from this site location. |
| Site 50: 7, 8 and 12 Waterside Way, Tooting SW17 OHB | The landowner seeks allocation for waste related uses on the site which the council does not support based on the South London Waste Plan. The most appropriate use for this site is the existing B2/B8 uses. Therefore, this site has been removed from the DPD. |
| Site 55: (Field B) St Catherine's Square, Grand Drive SW20 9NA | The site was assessed by independent ecologists and it does not meet the criteria to be designated as a Site of Importance for Nature Conservation at this point in time. Therefore, accordingly, the site will retain its existing Metropolitan Open Land (MOL), Green Corridor and Green Chain designations. |
| Site 71: Land at the corner of Weir Road/Durnsford Road (Homebase and Vantage | Vantage House (office building) was sold in February 2013. Homebase remains in separate ownership with |

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| House) 1 Weir Road, Wimbledon SW19 8UG | <p>a lease in place until 2020.</p> <p>The new owner of Vantage House contacted council and advised their intention to redevelop for residential purposes only in conjunction with proposed new permitted development rights. Council does not support solely residential use in this located therefore, the site has been removed from the DPD as the council's preferred use it is not available or deliverable.</p> |
| Site 72: Wolfson Rehabilitation Hospital, Corpse Hill West Wimbledon SW20 ONJ | A planning application has been submitted therefore the site can not be considered for the DPD site allocation. |
| Site 73: 117-125 London Road/ Dream Bed Superstore, 121-125 London Road, Mitcham CR4 2JA | Dream Beds propose an expansion of existing retail uses therefore; the site is no longer suitable to be considered for site allocation for the DPD. |
| Site 76: Jamia Ahmadiyya, 2 South Gardens, Colliers Wood SW19 2NT | The site has been purchased by council and it is not desirable to allocate the site for redevelopment within the timeframe of the DPD. |
| Site 81: Moat Pollards Hill Housing Estate, Pollards Hill | <p>Moat Housing Association, are considering upgrading the existing properties in the Pollard Hill area through refurbishment, infill development and associated landscaping.</p> <p>As such the appropriate approach towards this Moats proposal is through a masterplan in consultation with the local community. The council supports a masterplan approach involving the local community.</p> <p>Therefore, the site is no longer being considered for the DPD.</p> |

Annex 2 – List of Consultees

Statutory Bodies:

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| British Gas Plc | Mayor of London and offices held by the Mayor; and Greater London Authority (GLA) |
| CPRE London | Merton Priory Homes |
| Department for Culture, Media and Sport (DCMS) | Metropolitan Police Service |
| Department for Business Innovation and Skills | Metropolitan Police Authority (now under the Mayor of London) |
| Department for Energy and Climate Change | Mobile Operators Association (MOA) |
| Department Environment Food Rural Affairs | c/o Mono Consulting Ltd |
| Department for Work and Pensions (DWP) | Natural England |
| Director of Public Health | Network Rail |
| English Heritage | National Grid |
| EDF Energy Properties | Natural England |
| Environment Agency | NHS London Healthy Urban Development Unit |
| Highways Agency | Powergen Plc |
| London Ambulance Service | Royal Borough of Richmond |
| London Borough of Croydon | Royal Borough of Kingston upon Thames |
| London Borough of Wandsworth | Sutton and Merton Primary Care Trust |
| London Borough of Sutton | South West London NHS Support Services Partnership |
| London Borough of Kingston | South London Partnership |
| London Energy | The Coal Authority |
| London Fire and Emergency Planning Authority | Transport for London |
| Local Government Association | Thames Water Utilities |

Residents associations, groups, organisations and Civic organisations

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| Abbey MAG (Multi-Agency Group) | Homefield Road Residents Association |
| Amity Grove Residents Association | Lambton Road CA |
| Apostles Residents' Association | Lavender MAG (Multi-Agency Group) |
| Arthur Road Association | Lower Edge Hill and Darlaston Road Residents Association |
| Colliers Wood Community Association | Merton Park Ward Residents Association |
| Colliers Wood Residents' Association | Merton Allotments and Gardens Association |
| Cottenham Park Allotments | Mitcham Society |
| Community of Woodside Area Residents' Association (CWARA) | Mitcham Working Group |
| Drax Avenue Road Committee | North West Wimbledon Residents Association |
| Garth Residents' Association | Phipps Bridge and New Close Residents Group |
| Graham, Hartfield and Herbert Roads RA (GHHRA) | |
| Grange Residents Association | |
| Harland Estate Residents Association (HERA) | |
| Hillcross Community Action | |

Phipps Bridge MAG (Multi-Agency Group)
 Princes, Dudley and Kings Road Association
 Ravensbury Lanes and Avenues Residents Association
 Raynes Park Association
 Raynes Park and West BARNES Residents Association
 South Mitcham Community Association
 South Park Estate Residents' Association (SPERA)
 South Ridgway Residents Association
 The Raynes Park Association
 The Wimbledon Society

Treasurer Belvedere Estate Residents Association
 Village Residents Association (Mitcham)
 West Wimbledon Residents' Association
 Willow Lane Action Group
 Wimbledon Park Residents Association
 Wimbledon East Hillside RA
 Wimbledon Union of Res Ass (WURA)
 Wimbledon Common West Residents Association
 Wilmore End Residents Association
 Wimbledon Civic Forum
 Wimbledon E Hillside Residents' Association (WEHRA)

Ethnic Minority groups and organisations

Abaana Bantu
 African Community Involvement Association
 African Culture Promotions
 African Educational Cultural and Health Organisation (A.E.C.H.O)
 African Refugees Project
 Ahmadiyya Muslim Women's Association
 Asian Elderly Group of Merton
 Asian Women Feeling Good Group
 Asian Youth Association
 Asylum Welcome
 Azadeh Community Network
 Baha'i Community of Merton
 Bangladeshi Association of Merton
 Bengali Association of Merton
 Black Ethnic Cultural and Welfare Organisation (BECWO)
 BME TVFM Charitable Foundation
 Breaking Free
 Ethnic Minority Centre
 Ethnic Minority Drugs Awareness Project and Merton African Organisation
 London Gypsy and Traveller Unit
 London Oriel Cultural and Social Club
 London South West Chinese Community Association
 MeMu (Merton Multicultural Cooperative Ltd)
 Merton and Wandsworth Asylum Welcome

Merton's Ethnic Minority Housing Strategy Team
 Merton Racial Equality Partnership
 Merton Sickle Cell and Thalassaemia Group
 Merton Somali Community (MESCO)
 Merton Unity Network
 National Federation Gypsies Liaison Groups
 Pakistan Cultural Association - Merton and Wandsworth
 Pakistan Welfare Association
 Pearl of Africa Foundation (PAF)
 Polish Family Association
 Somali Support Solutions
 South London African Klomen Organisation (SLAKIO)
 South London Irish Welfare Society
 South London Refugee Association
 South London Somali Community Association
 South London Tamil Welfare Group
 Sutton and Merton Traveller Education Service
 The Gypsy Council
 The Migrant and Refugee Communities Forum
 The School of Oriental and African Studies (SOAS)
 Travellers/Gypsies Advisor
 World Tamil Organisation (UK)

Residents

A total of approximately 1400 emails and letters were sent to individuals.

General bodies

Merton Chamber of Commerce
Morden Town Centre Partnership
Chartered Institute of Personnel and Development
South Wimbledon Business Area Group
Sutton Business Centre

Businesses

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| AHC Associates | Luxury Estates Limited |
| Aubergine Art and Picture Framing Ltd | Meganexus Limited |
| Barclays Bank plc | Navalmar (UK) Ltd |
| BERA | PAG Limited |
| B and D Clays and Chemicals Ltd | Pavnel's Agents |
| B G Transco | Royal Mail Group Limited |
| BSKYB | Rule Financial |
| Cantium (Beddington House) Ltd | Sita UK (South East) |
| Centre Court Shopping Centre | South London Crematorium |
| Chris Thomas Ltd | Sterling Insurance Group |
| Dignity Funerals Ltd | Stewart Ross Associates |
| Ferncombe Properties | TG21 plc |
| Functional Intelligent Training | The Mill House Brewers Fayre |
| Gala Coral | T-Mobile |
| Gerald Eve | The Watershed |
| Gina's Nannies | UK Asset Managers Ltd |
| GRA Acquisition | Up-Town Dance Club and Learning Centre |
| Herrington Consulting Ltd | Utilita Services Limited |
| HH Technology T/A Art of Computing | Vodafone Ltd |
| Hutchinson 3G | Windsor Stebbing Marsh |
| Killoughery Group | Workspace Group Plc |
| Landsdale Florists | Wrenshaw Court Freeholders |
| Lafarge Aggregates Ltd | YRM Architects |
| LandM Materials | |
| London Interspace Ltd | |

General consultees

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| a2 Dominion | All Saints Church, South Wimbledon |
| a2hg | Alliance Property Developments Ltd |
| Abbotsbury Primary School | Amazon Properties plc |
| Aberdeen Asset Management | Amicus Horizon Group |
| Ability Housing | Anchor |
| Aegon UI Property Fund Ltd | Antler Homes Southern Plc |
| Affinity Sutton | Aragon Primary School |
| Ahmadiyya Muslim Association (EMC) | Armchair London South (Buses) |
| All England Lawn Tennis and Croquet Club | Arriva London South Ltd |
| All Nations Revival Church | Arup |
| All Saints CE Primary School | Ashill Developments |
| | ATIS Real Weatheralls |

Audichya Gadhia Brahma Samaj Society (AGBSS)
 Axa Real Estate
 B E Manji and S B Manji
 Baker Associates
 Balham Sport and Social Club
 Barnfield Construction (UK) Ltd
 Barratt Homes
 Barton Willmore Planning
 Beecholme Primary School
 Bellway Homes
 Benedict Primary School
 Bentley-Leek Properties Ltd
 Berkeley Homes (Urban Renaissance Ltd)
 Bewley Homes
 BFL Management Ltd
 Bishop Gilpin CE Primary School
 Bishopsford Community
 Blackrock (owners of Plough Lane)
 Blossom House School
 Blossom House Special School
 Blue Sky Planning
 Bond Primary School
 Bree Day Partnership
 British Motorcyclists Federation
 British Muslim Association of Merton
 Brixton Plc
 Broomleigh Housing Association
 Burgess Mean Architects
 Bus Priority Team
 CABE
 Cadugan Developments Ltd
 Campaign for Real Ale
 Cappagh Group
 Carers Support Merton
 Carpenter Planning Consultants
 Casson Conder Partnership
 Catholic Children Society
 CDC2020
 Central and Cecil Housing
 CGMS Consulting
 Chase Hospice Care For Children
 Cherwell Land and Homes Ltd
 Children and Parents Carnival Association
 Christopher St James PLC
 Church Commissioners
 City Bridge Trust
 Civil Aviation Authority
 Cluttons LLP
 CMA Planning
 Colliers Wood Youth and Play Working Party
 Colliersbridge Properties Ltd
 Collins Planning Services Ltd
 Commonsense Trust
 Community Home Care Provider
 Connexions Prospects
 Conrad Phoenix London Ltd
 Costco Wholesales UK Ltd
 Countryside Properties PLC
 Cranbourne Ltd
 Cranmer Primary School
 Cricket Green Medical Centre
 Cricket Green Special School
 Crown
 Croydon Churches Housing Association
 Date Valley
 Design for London
 Development Planning Partnership
 Dialogue
 Director Hese-UK
 Disability Alliance Merton (DAM)
 Dominion
 Donhead Preparatory School
 Dons Trust Board
 DP9
 DPP
 Drakesfield Management Ltd
 Drivers Jonas Deloitte
 Drivers Jonas LLP
 DTZ PIEDA Consulting
 Dundonald Congregational Church
 Dundonald Primary School
 Dunward Properties Ltd
 Eagle House School Special School
 East Thames Buses
 Edco Design
 Ekaya
 Elim Pentecostal Church
 Elliott Wood Partnership
 Empire Estates (GB) Ltd
 English Churches
 English Sports Council
 Epsom Coaches
 ESA Planning
 Euroworld Developments Ltd
 Fabric Warehouse
 Faith in Action Homelessness Project
 Faithfull Architects
 Family Housing Association
 Family Mosaic
 Farm Road Church
 First Capital Connect (Thameslink)
 Firstplan
 Firstplus Planning
 Floyd Slaski Partnership
 FND Group

Freight Transport Association
 Friends of Cottenham Park
 Friends of Dundonald Park
 Friends of Durnsford Recreation
 Ground
 Friends of Haydons Road Recreation
 Friends of Holland Gardens
 Friends of Phipps Bridge (FoPB)
 Friends of Ravensbury Park
 Friends of Sir Joseph Hood MPF
 Friends of South Park Gardens
 Friends of Tamworth Farm
 Garden Primary School
 Genesis
 GHG
 Girl Guides Wimbledon Division
 GL Hearn
 Glenroy Estates Ltd
 Go Forum
 Goldcrest Homes (Colliers Wood) Ltd
 Goodman Property Investors
 Gorrington Primary School
 GP Mitcham Medical Centre
 Gregory Gray Associate
 Grenfell Housing Association
 GVA Grimley Ltd
 Gypsies and Travellers
 Haig Homes
 Hall School
 Harris Academy Merton
 Haslemere Primary School
 Hatfeild Primary School
 Hephher Dixon - Planning and
 Regeneration
 Hermes Real Estate
 Hi-Dra Consultants Ltd
 Hillcross Primary School
 Hollymount Primary School
 Holy Trinity CE Primary School
 Home Builders Federation Ltd
 Home Group
 Housing 21
 HOW Planning
 Humphreys and Co solicitors
 Hyde Housing Association
 Ignis Real Estate
 Indigo Planning
 Inland Waterways Association
 Insight
 Institute of Cancer Research
 International Properties (Wimbledon)
 J.G. Land Estates
 Jenner Jones Surveyors
 JKL Architects and Town Planners Ltd
 JL Planning
 JMP
 John Sharkey and Co
 Jones Lang LaSalle
 Joseph Hood Primary School
 Kelsey Housing Association Ltd
 Kender Homes
 Kennet Properties Ltd
 Key London Alliance
 King Sturge LLP
 Kings College
 Kirkwells
 Knight Frank LLP
 Kossway
 LandQ Tower
 Lakebird Properties Ltd
 Lavender Fields Surgery
 Leander (Wimbledon) Ltd
 Lennon Planning Limited
 Lewis and Hickey Architects
 Liberty Primary School
 Lichfield Planning
 Lidil UK GmbH
 Links Primary School
 Linkwood Consultants Ltd
 Little League Mitcham
 Little League Wimbledon
 London and Quadrant Housing
 The John Innes Society
 Trust
 London Borough of Westminster
 London Buses
 London Cycling Campaign
 London Fire and Emergency Planning
 Authority
 London Genral Transport Services Ltd
 London Housing Federation
 London Property Holdings Ltd
 London Travel Watch
 London Underground Limited
 London United Busways
 Lonesome Primary School
 LQ Group
 M and M Architectural Services
 Majorlink Ltd
 Malcolm Scott Consultants Ltd
 Malmesbury Primary School
 Marcus Beale Architects Ltd
 Mary Tate Almshouses
 Maurice Cox
 Mayer Brown Limited
 McCarthy and Stone (Developments)
 Ltd
 Melrose Special School
 Merton Abbey Primary School
 Merton Carers Partnership

Merton Cycling Campaign
 Merton Design Review Panel
 Members
 Merton Development Officer Contact a
 Family Sutton and Merton
 Merton Executive Committee
 Merton Hall FC
 Merton Hard of Hearing Group
 Merton Mental Health Users Forum
 Merton Park Primary School
 Merton Pre-School Learning Alliance
 Merton Priory Homes
 Merton Youth Awareness Programme
 Merton Youth Forum
 Merton Youth Parliament
 Metrobus Ltd
 Metropolis Planning and Design
 Metropolitan Housing Trust
 Metropolitan Public Gardens
 Association
 Millat Asian Housing Association
 Mitcham Baptist Church
 Mitcham Congregation of Jehovah's
 Witnesses
 Mitcham Cricket Green Community
 and Heritage Trust
 Mitcham Parish Church
 MOAT
 Morden Cricket Club
 Morden Little League
 Morden Park Baptist Church
 Morden Park Playing Fields
 Association (MPPFA)
 Morden Primary School
 Motorcycle Action Group
 Nathaniel Litchfield and Partners
 Neighbourhood and Primary Care
 Development
 Network Rail asset management
 New Life Assembly Worship (SMCA)
 Newridge Trading Limited
 NHP Group
 Norman Road Haulage (Wimbledon)
 Ltd
 Notting Hill Housing Group
 Orbit
 Palace Gate Properties Ltd
 Parsons Brinckerhoff
 Pathway
 Paul Brookes Architects
 Paul Dickinson and Associates
 Peabody
 Peacock and Smith
 Pelham Primary School
 Peter Pendleton and Associates Ltd
 Phoenix Logistics Limited
 Planning and Regeneration Ltd
 Planning Perspectives
 Planning Potential Ltd
 Planning Works Ltd
 Poplar Primary School
 Port of London Authority
 Possfund Custodian Trustee Ltd
 Presentation Housing Association
 Priory CE Primary School
 Project Design Partnership
 Quality Line
 Quod Planning
 R P S Planning
 Ramblers' Association
 Rapleys LLP
 Raynes Park Secondary School
 Renaissance Planning
 RIBA
 Ricards Lodge Secondary School
 Riverside
 Road Haulage Association
 Robert Turley Associates
 Robinson Escott Planning
 Roger Miles Planning Ltd
 Roger Tym and Partners
 Rolfe Judd Planning
 Roman Catholic Church (SMCA)
 Rowans Surgery
 Royal Marsden NHS Foundation Trust
 RPS Planning (West London office)
 Rutlish Secondary School
 Ryhurst Limited
 Sacred Heart RC Primary School
 Sainsbury's Supermarkets Ltd
 Salvation Army Wimbledon Corp
 Sanctuary
 Savills (Wimbledon office)
 Savills Commercial Ltd
 Savills/Schroders Team
 Scott Wilson
 Scout Association- Wimbledon and
 Wandle District
 Service Improvement Manager
 Seventh Day Adventist Church
 (SMCA)
 SHA Estates - London
 Shauket Hussein and Amtul W
 Hussien
 Sherwood Primary School
 Shire Consulting Ltd
 Shree Ghanapathy Hindu Temple
 Signet Planning
 Simon Charles Hanks
 Singlegate Primary School

Smart Centre
 Somerfield Stores
 South London Freight Partnership
 South Thames College Merton
 Campus
 South West London Health
 Partnership
 South West Trains
 Southern (Railway)
 Spacia (Network rail)
 Squirrels (CSS)
 SS Peter and Paul Primary School
 St Ann's Special School
 St Barnabas Church - Mitcham
 St Christopher Fellowship
 St George's Healthcare - Voluntary
 Services Dept
 St Helier Congregational Church
 St Heliers Methodist Church
 St Marks Church of England Academy
 St. John Fisher RC Primary School
 St. Mark's Primary School
 St. Mary's RC Primary School
 St. Matthews CE Primary School
 St. Peter and St Paul RC Primary
 School
 St. Teresa's RC Primary School
 St. Thomas of Canterbury RC Primary
 School
 Stanford Primary School
 Star Planning and Development
 Strategic Perspectives LLP
 Study Preparatory School
 Superdrug Stores plc
 Sustrans
 Sutton and Merton Primary Care Trust
 Sutton and Merton PCT
 Tamil Housing
 Taylor Wimpey UK Ltd
 TCL (Tramstrack Croydon)
 Terry Pawson Architects
 Tesco Stores Limited
 Tetlow King Planning
 Thames Valley Housing Association
 Thames Water
 The Barton Willmore Planning
 Partnership
 The Diocese of Southwark
 The Dons Trust
 The Hards Partnership
 The Harris Academy Merton
 The Hon. Soc. of the Inner Temple
 The John Innes Society
 The Lawn Tennis Association
 The London School of Economics and
 Political Science
 The Norwegian School
 The Planning Bureau Limited
 The Rowans School
 Threshold Housing Association
 Tibbalds Planning and Urban Design
 Ltd
 Tooting and Mitcham Sports and
 Leisure Ltd
 Tower Homes
 Transport and Travel Research Ltd
 Transport for London (TfL)
 Travel London
 Travis Perkins Plc
 Tribal M J P
 Trinity Church Wimbledon
 Turley Associates
 TVHA
 United Response
 URS Scott Wilson
 Ursuline Preparatory School
 Ursuline RC Secondary School
 Viridian Housing
 Viscount Cricket Club
 Waitrose PLC
 Wandle Housing Association
 West Wimbledon Primary School
 White Young Green
 William Morris Primary School
 Willington School
 Wilmot Dixon
 Wimbledon Chase Primary School
 Wimbledon College RC Secondary
 School
 Wimbledon Common Preparatory
 School (Squirrels)
 Wimbledon High School
 Wimbledon International 7th Day
 Adventist Church
 Wimbledon Jewish Reform Synagogue
 Wimbledon Library
 Wimbledon Park Heritage Group
 Wimbledon Park Primary School
 Wimbledon Taxi Drivers
 Wisepress Ltd
 WM Morrison Supermarkets PLC
 WS Atkins plc
 YMCA (Wimbledon)
 Youth Culture Television (YCTV)

