

Consultation number	Consultee name	Chapter reference	Policy / site reference	Para / page reference	Representation	LBM comments
1	57 High Path Limited	Proposed Site Allocation			This supporting statement is prepared ... to support and promote the allocation of the IMO Car Wash Site, 57 High Path, Merton for residential development and therefore included in its emerging Local Plan. We previously provided representations and put forward this site for allocation in response to the Stage 2a consultation in January 2021, however, the site has not been taken forward. The Site has the potential to provide a residential development providing circa 50 residential units.	No further change proposed. Site allocations received at Stage 2a (which ended in February 2021) do not allow scope within this local plan process for further consultation with neighbours and statutory bodies. Sites received at this stage, after two rounds of Regulation 18 and more than six months of public consultation cannot be delivered as site allocations through this local plan process. We recommend engaging with Merton's development management team on the planning application process.
1	57 High Path Limited	11 Housing			London Borough of Merton's Housing Delivery Although Merton have been exceeding the number of homes required, housing delivery with London borough of Merton needs to increase significantly in order to meet the new housing need.... Merton's Five Year Housing Supply 2020 confirms that Merton will rely on 15% of their Housing Supply to come through their windfall allocation, this is higher than the 11% proposed to come from Allocations in order.	Please see Merton's updated housing annual position statement including Merton's five year housing land supply 2021 which demonstrates that Merton can meet its five year housing land supply
1	57 High Path Limited	11 Housing			Furthermore, we believe that Merton's proposed stepped trajectory for housing delivery is not realistic and is unsustainable. Although we acknowledge that there has been a high increase in the housing target, there isn't the evidence to justify this stepped delivery and allowing the delay in meeting the required housing provision is not sustainable.... The Council should not delay meeting significant housing needs and therefore it is considered that the proposed stepped trajectory is not justified and therefore not considered sound. Our client 57 High Path Limited would therefore request your support in allocating the IMO Car Wash site for residential development to aid and meet the increased housing need.	No further change proposed. Please see evidence in Merton's housing delivery research 2020; Merton's Strategic Housing Needs Assessment 2019, Merton's draft Housing Delivery Strategy 2021; Merton's housing annual position statement (including five year supply 2021, Merton's housing delivery test action plan 2021 and the GLA's representations on Regulation 19 and following on Merton's Local Plan which demonstrate that Merton's proposed stepped trajectory is justified and deliverable. The representors have not provided evidence that contradicts this.
1	57 High Path Limited	11 Housing			A draft site allocation W17 sheet had been prepared and submitted as part of the Stage 2a consultation in January 2021 for your consideration to allocate the Site for residential development. The Council confirmed within the members summary dated 3rd March 2021 that 57 High Path was put forward for a residential allocation, but consider that the site cannot be allocated now, specifically commenting "cannot be taken forward at this time; the Local Plan has been subject the three public consultations". This is not justified and therefore not sound. An appropriate strategy providing a reasonable alternative to allocating the site based on proportionate evidence has also not been demonstrated and can therefore not be considered justified and does not meet the tests of soundness.	No further change proposed. As stated, the site cannot reasonably be delivered as a site allocation as its late submission does not allow adequate time for evidence to be gathered including engagement and dialogue with neighbours, community groups, statutory undertakers etc on the proposal. We recommend that the representor consider the planning application process to bring the site forward.
1	57 High Path Limited	13 Economy and town centres	EC13.3		The IMO Site is not currently proposed to be allocated within the Emerging Merton Local Plan, however, according to emerging Policy EC13.3 (previously referred to as EC7.2), the Sui Generis automated car wash site would be considered a 'Scattered Employment Site' and therefore the Council would seek to retain this for employment use. The criteria to be met within the emerging policy are far too restrictive for such a small employment generating Sui Generis site and therefore more consideration needs to be given to the policy or in fact to the range of sites that are considered to fall under the 'Scattered Employment Sites' category. The London Plan states that boroughs are encouraged to assess whether the release of land for alternative uses is more appropriate if demand cannot support employment uses in the existing locations.... Given that the IMO site is located within a well connect location and in an area where intensification and the redevelopment for residential use is supported, we believe the Site should be exempt from the Policy implications and in fact allocated for residential development.	No further change proposed. Sui generis uses that generate employment will be considered as part of Policy EC13.3
1	57 High Path Limited	13 Economy and town centres	EC13.3		The Policy in its current form is not in line with the objectives of the NPPF or the new London Plan (March 2021) which promotes the release of commercial land for residential development. Therefore the plan cannot be considered sound	no further change proposed - issues covered in detailed representations
1	57 High Path Limited	13 Economy and town centres	EC13.3		The policy needs to be reworded to exclude unallocated Sui Generis employment sites that only provide limited job opportunities from needing to meet the relevant criteria. In its current form, the Policy is too restrictive and should look to promote the release of Sui Generis sites to provide much needed residential development without the requirement of meeting the criteria of Draft Policy EC13.3.	No further change proposed. Sui generis uses encompass a very broad range of different land uses. It is appropriate and reasonable to consider these under Policy EC13.3 where they support jobs and business.
1	57 High Path Limited	13 Economy and town centres	EC13.3		Currently, we believe that the Draft Local Plan does not meet all four tests of Soundness as listed in Paragraph 35 of the NPPF. Specifically, the prevention of the allocation of the IMO site is not justified and given the draft employment policy is too restrictive in terms of protecting Sui Generis employment sites, this is not consistent with national policy in supporting the use of employment land for homes in areas of high housing demand	no further change proposed - issues covered in detailed representations
2	AELTC	02 Climate Change			The AELTC request that this statement is re-inserted into the Site Allocation as it is important that the seasonal use of many of the AELTC Estate buildings is recognised within the site allocation. Further, this reflects current discussions to date with Merton Officers on the Energy Assessments for recent applications on the main AELTC Estate, such as the Millennium and Media Buildings.	Noted. We note that AELTC is working towards net zero for their operations by 2030 https://www.wimbledon.com/en_GB/about_wimbledon/2020-07-01_what_does_net_zero_mean_for_the_aeltc.html This is welcomed as it will help to deliver the climate emergency declaration for Merton of being a net zero carbon borough by 2050.
2	AELTC	02 Climate Change	CC2.2		In relation to Policy CC2.2 Minimising Greenhouse Gas Emissions, there is a requirement for a 50% reduction in CO2 for non-residential development over 500sq. It should be recognised that the current GLA 2020 Energy Assessment Guidance requires a 35% on-site reduction beyond Part L 2013, with 15% achieved through energy efficiency measures. Further, there is no mention of energy efficiency standards that are expected, in addition to the 50% reduction. We would request clarification on this point. Whilst we understand Merton's ambitions to achieve zero carbon by 2030, the requirement of a minimum of 50% goes above London Plan Policy targets. Such minimum requirements are likely to have a significant impact on development proposals coming forward. It is therefore requested that these targets are amended to be in line with the London Plan. It is noted that Clause 2.2.17 of policy CC2.2 requires the carbon shortfall to be assessed at £300 per tonne. This represents a significant increase by £205 per tonne compared to the current London Plan. Whilst it is understood that this increase above London Plan policy is to incentivise on-site savings, such a requirement will have significant financial implications on the delivery of schemes. It does not appear that this has been assessed from a viability point of view. Viability testing is important to ensure that policy requirements set out do not threaten the ability to deliver high quality schemes in a viable manner.	All non-domestic development over 500sqm GIA is expected to achieve at least a 15% improvement against Building Regulations through energy efficiency alone, and at least a 50% improvement on site overall. This is specified within policies CC8.11 and CC8.12. The proposed minimum on-site target of 50% and cost of carbon of £300/tCO2 are based on recommendations from a study commissioned by several London boroughs in 2019/2020 (https://www.haringey.gov.uk/sites/haringeygovuk/files/202005-towards-net-zero-carbon-report-revm.pdf). This study found that the London Plan on-site carbon reduction targets and cost of carbon are inadequate for delivering the savings required to achieve net-zero carbon. The study demonstrated that, using more up to date carbon emissions factors than those used in Building Regulations 2013 (SAP 10 and SAP 10.1), with an efficient low carbon heating system (e.g. a heat pump) and reasonable levels of fabric and ventilation performance, new build residential and non-residential developments can and should achieve at least a 60% and 50% improvement against Building Regulations 2013 respectively. The decarbonisation of the electricity grid means that, for the same specifications, a greater improvement over Part L is achieved with no extra effort/ cost. The study also found that it would cost a local authority at least £300/t to offset carbon in a sustainable way, taking into account administration and management costs. Using the current cost of carbon recommended in the London Plan (£95/t), local authorities therefore have insufficient funds through the cash-in-lieu contributions to deliver equivalent carbon savings off-site to offset the carbon shortfall from a development. At £95/t, it is cheaper and easier for developers to offset carbon emissions via cash-in-lieu contributions than it is to achieve the actual savings on site, resulting in developments with higher operational emissions, and a carbon shortfall which cannot be offset. The proposed onsite targets and cost of carbon are required to maximise carbon savings on site in order to future-proof development and minimise the need for expensive retrofit, to achieve our national and local carbon reduction commitments.
2	AELTC	02 Climate Change	CC2.3		Within Policy CC2.3 Minimising Energy Use, a table is provided referring to fabric efficiency targets. Clarification is sought on if these targets are based on predicted operational energy use (regulated + unregulated) from TM54 (or similar), or just regulated (from BRUKL).	The Fabric Energy Efficiency Standards and Space Heating Demand targets provided in the table in Policy CC8.12.d represent regulated energy use. The Energy Use Intensity referred to in Policy CC8.12 includes both regulated and unregulated energy use. Energy Use Intensity is an annual measure of total energy consumed in a building which can be estimated at design stage and easily monitored in-use as energy bills are based on kWh of energy used by the building. It includes regulated (heating, hot water, cooling, ventilation and lighting) and unregulated (plug loads and equipment) energy.
2	AELTC	02 Climate Change	CC2.5	1.1.4	Clause 1.1.4 of Policy CC2.5 Minimising Waste & Promoting a Circular Economy, refers to embodied carbon targets that new developments should achieve by 2025. It is not clear what the evidence base is that informs these targets. Such targets do not appear to have been robustly tested for economic and financial viability to understand deliverability	Policy CC8.14 requires all schemes of 30 dwellings and above and/ or 1000sqm non-domestic GIA and above, as well as schemes proposing to demolish and rebuild a single dwelling, to demonstrate that whole-lifecycle carbon (WLC) savings have been maximised by carrying out a WLC Assessment. The embodied carbon targets included in the justification are best practice targets for 2020 and 2030 identified in LETI's Climate Emergency Design Guide. All new development will be expected to endeavour to minimise embodied carbon in line with best practice targets contained in the latest industry guidance.

2	AELTC	02 Climate Change			In summary, the key concerns the AELTC have with the emerging climate change policies are relating to the targeted carbon reductions and space heating requirements. Further evidence base and viability testing is required to fully understand the implications of the policy aspirations. Our understanding is that the requirements have been developed based upon the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide. While we applaud the ambition and intent of the LETI publication, and the ambition of Merton's emerging policies to align with this, the document was produced as guidance for designers, rather than an evidence based document. Currently it is not clear if the proposed policy requirements have been robustly tested and evidenced to allow appropriate justification of the proposed policies in accordance with paragraphs 31 and 35 of the NPPF	The proposed targets are based on a study commissioned by several London boroughs on achieving greater carbon reductions on site, and reports from the Committee on Climate Change and the London Energy Transformation Initiative which set out the pace and scale of change required to achieve our net-zero carbon commitments. The policy includes a provision that if the developer can't meet the requirement if it is unviable, we will consider this on a case by case basis on the submission of a viability assessment given the range of commercial developments in Merton. These policies have been set to ensure that new development is compatible with operating at net-zero carbon by 2050. The proposed targets are required to maximise carbon savings on site in order to future-proof development and minimise the need for expensive retrofit, to achieve our national and local carbon reduction commitments of becoming net-zero carbon by 2050. We understand that AELTC have an ambition for their operations to be net-zero carbon by 2030. We are already working with AELTC to recognize the unique use of their buildings and are happy to continue working with them towards our shared goal of net-zero carbon.
2	AELTC	06 Raynes Park	RP5		Within the 'Site allocation' section the following is stated: "The site is can be found in designated open space with sport and recreation use that are compatible with open space designation." It is assumed that this sentence is intended to note the sites open space designation and that the current sport and recreational use on site is compatible within this designation. It is requested that this is made clear in the wording.	Agree to additional mod for clarification: Site allocationThe site can be found in is designated <u>as</u> open space <u>and contains with</u> sport and recreation use that are compatible with <u>its</u> open space designation.
2	AELTC	06 Raynes Park	RP5		Within the updated Draft Local Plan a new section has been added, 'Infrastructure Requirements', in which there is some commentary on open space provision. We would suggest amending this paragraph to the below to reflect planning policy (amendments noted in red). "This site is in an area identified as being deficient in access to public open space. The Council will require major development proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, where this is suitable and viable, in accordance with the Green Infrastructure policies."	Agree to additional modification to bring the site allocation into conformity with proposed policy O.15.2 Open space and green infrastructure, section (d) which refers to major development, suitability and viability. Infrastructure requirements "This site is in an area identified as being deficient in access to public open space. The council will require <u>major</u> development proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site <u>where this is suitable and viable</u> , in accordance with the Green Infrastructure policies."
2	AELTC	09 Wimbledon	Wi3		We write on behalf of our client, the AELTC, to make representations on the New Local Plan. The AELTC's Church Road site hosts The Championships, Wimbledon which is the oldest tennis tournament in the world and is internationally regarded as the finest stage in world tennis. The Championships and AELTC grounds are of national and international significance. The AELTC's strategic aspirations are to maintain Wimbledon's position at the pinnacle of the sport, and leverage that position to act as a guardian of tennis, and a force for good for its communities, particularly locally. The main All England Lawn Tennis Club (AELTC) site comprises 18 grass show courts (including No.1 Court and Centre Court), 8 external clay courts within the Southern Apex, 16 grass practice courts on the north eastern section of the site. The site also accommodates significant infrastructure to support The Championships including catering facilities, player facilities, hospitality, offices, media and broadcasting facilities, press, security, etc., in a series of buildings and structures across the site. The AELTC acquired the Wimbledon Park Golf Club (immediately to the east of the main grounds) in the 1990s and in December 2018 it bought the remaining years of the lease from the golf club. This significantly increases the AELTC's landholdings and will provide the opportunity to host the qualifying event at the expanded site. The AELTC has recently submitted a planning application for the use of this land in the future. The New Local Plan is of particular interest and relevance to the AELTC as they are involved in a number of live projects to ensure the AELTC's facilities are genuinely regarded as the finest in global tennis and thus contribute to Wimbledon's pinnacle position, including the planning application that has been submitted for the Wimbledon Park Project. The upgrade and improvement of facilities is important in order to maintain Wimbledon's status as the premier tennis tournament in the world and a key contributor to the local and London economy The AELTC is understandably keen to ensure that existing and emerging planning policy does not set out any potentially inappropriate barriers to new development coming forward and instead that it encourages sustainable development within the Borough as a whole and at the AELTC site. The AELTC submitted detailed comments to the Stage 2a consultation on the New Local Plan 1st February 2021, of which AELTC welcome that some of these comments were incorporated in the new Draft Local Plan. This letter sets out a summary of AELTC's comments on the Stage 3 consultation of the New Local Plan in turn below	Noted
2	AELTC	09 Wimbledon	Wi3		Site Allocation Wi3 As noted in previous comments on the New Local Plan, we welcome and support that the main AELTC site on Church Road, including Wimbledon Park Golf Course has been allocated within the New Local Plan as Site Allocation 'Wi3'. Upon review of the site allocation we have a number of comments which are covered in turn below. Within the 'Site Description' section it is suggested that following the last paragraph regarding the preparation of the updated masterplan, that the following text is included relating to the new Master Plan. "The AELTC's priorities in developing a new Estate Master Plan are to strengthen The Championships for the years to come, including the staging of an enhanced qualifying event at the grounds, and to use the AELTC's influence and resources to deliver a greater positive impact for its communities. Critical to this will be the AELTC's commitment to act as a good steward of the expanded land holding, reflecting its history and its place in the local community."	Agree with the following minor amendments to Site Wi3 for clarity Site description "The AELTC have commenced the preparation of an <u>updated masterplan new masterplan</u> to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course. <u>In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.</u>
2	AELTC	09 Wimbledon	Wi3		Within the 'Existing Use' section of the site allocation, it should be recognised that there is currently no public access to the golf course and around the majority of Wimbledon Park Lake.	Existing use: Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities <u>with no public access other than in line with golf club membership rules</u> This use will cease from January 2022.
2	AELTC	09 Wimbledon	Wi3		Within the 'Design and accessibility guidance' section, it is suggested that the first paragraph is amended to the following to recognise the Qualifying Event as part of the proposals for the golf course. "Development of the site provide an opportunity to master planning the golf course land to create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC's facilities to continue the prominence of The Championships and the opportunity to host more of the pre Championship activities within Merton, including the Qualifying event." Further, within this section it is stated that the AELTC is the 'former golf course landowner'. This needs to be updated with the word 'former' removed as the AELTC are the landowners of the golf course.	Design and accessibility guidance: Development of the site provide an opportunity to master planning the golf course land to create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC's facilities to continue the prominence of The Championships and the opportunity to host more of the pre-Championship activities within Merton <u>including the qualifying event</u> ... Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's "heritage at risk" register by AELTC (<u>the landowner of the former</u> golf course <u>landowner</u>) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.
2	AELTC	09 Wimbledon	Wi3		We note that within the 'Issues' section of the previous version of the Local Plan (Stage 2a Consultation) the following was stated;	Infrastructure: "The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relatively little outside the tennis grass court season given its size and scale. <u>Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of any unusual usage patterns prevalent at the time and predicted for its future use'</u>
2	AELTC	14 Infrastructure	IN14.3		Policy IN14.3 Sport and Recreation states the following regarding the AELTC. "e. Recognise the All England Lawn Tennis Club as being an internationally significant sporting venue." It is requested that this wording is updated to include 'and continue to support activity and enhancement' as it is important that enhancement of facilities is supported to ensure the continued success of The Championships.	The policy wording has been reviewed in line with the comments submitted by AELTC. Similar wording is already included in the Wimbledon Area Policy N9.1q "Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally. " It is not considered necessary to duplicate this wording in Policy IN14.3. No further action required

2	AELTC	15 Green and Blue Infrastructure			Green and Blue Infrastructure Within the New Local Plan information an updated Open Space and MOL map is included and a summary table of the proposed amendments. The policy map changes table and summary advises that Open Space and MOL amendments are proposed to the All England Lawn Tennis Club (Ref TEP-03). We welcome that these changes have now been incorporated into the updated proposals map following the Stage 2a consultation.	Noted
2	AELTC	All			Conclusion The AELTC welcome the opportunity to comment on the New Local Plan and support the allocation of the main AELTC Estate on Church Road, including the golf course and the Raynes Park site. Specific comments are provided in relation to these site allocations to ensure the intensions of these sites and proposed future use is made clear. Whilst the AELTC are generally supportive of the New Local Plan and the proposed polices, there are elements of the draft guidance that require further clarity and explanation to allow them to be effective and viable. The AELTC would welcome further discussion and clarification on these points. The AELTC trust that their comments will be fully considered as part of the consultation and we would welcome further discussion on the comments raised.	noted
2	AELTC	Policies Map			Within the New Local Plan information an updated Open Space and MOL map is included and a summary table of the proposed amendments. The policy map changes table and summary advises that Open Space and MOL amendments are proposed to the All England Lawn Tennis Club(Ref TEP-03). We welcome that these changes have now been incorporated into the updated proposals map following the Stage 2a consultation. A review of the summary of the proposal map amendments demonstrates that it is only proposed that the MOL designation is removed from the built up areas and buildings of the site and the designation is retained on the practice courts to the north. In terms of open space, it is stated that the designation should be retained to the lawns, gardens and general open space to the northwest of the site. Whilst the AELTC understand Merton's desire to protect these areas, retaining these areas under an MOL or Open Space designation is not appropriate or in line with planning policy. The site is not accessible to the public to allow for the benefit of these designations, furthermore it is part of the main AELTC site for The Championships.	Changes are proposed to the AELTC site off Church Lane in the Policies Map, to Open Space and MOL. The text in the Green Infrastructure Study 2020 sets out the view of TEP in their review of the designations. Since then, officers have reviewed the sites and recommended further changes to some boundaries in the Policies Maps. This includes changes to the AELTC site. For the AELTC site, the maps published for the Stage 3 Local Plan consultation are the final recommendations by officers. This includes removal of part of the MOL and Open Space as these areas do not meet the criteria for these designations. In response to the AELTC representation, MOL and Open Space Policy Map designations do not only apply to land that is publicly accessible and there is other criteria to be considered. No further action required.
3	Avendano, M	01a Introduction			Paragraph 1.1.3 I would be grateful to be invited to attend any examination hearings on Merton's new Local Plan and Policies Maps. 1.1.21 I would ask the Inspector to consider requesting the LBM to publish in a simple reading format schedule the proposed policies and Policies Map changes being introduced in the new Local Plan correlated to the policies and Policies Map of the existing adopted Local Plan. It is difficult for the residents to trace back the proposed changes to the original adopted policies. This document should be published for scrutiny before the new Local Plan is adopted.	Noted. No change requested. Unfortunately it won't be possible to publish in a simple reading format schedule all of the differences between the existing 2011 Core Planning Strategy, existing 2014 Sites and Policies Plan and new Local Plan due to the size of all plans and the number of issues they cover. However if there are specific policy areas where you would like to see the changes you may wish to compare the existing and new plans for these specific areas, all of which are published online via https://www.merton.gov.uk/planning-and-buildings/planning/local-plan
3	Avendano, M	09 Wimbledon	Wi3	263	Under Place Profile: Wimbledon, page 263, the text is referenced to Merton's Borough Character Study 2021. This document in its Adoption Statement dated 22 June 2021 is still subject to a Period of Challenge and subject to review by the Inspector. In its Chapter F: Wimbledon, page 65, WIMBLEDON PARK Distinctiveness – heritage and key features, the text in this section does not reflect the character of this area, i.e. "A largely non-residential neighbourhood area...etc". Under key issues / opportunities, the text refers to "A masterplan for the All England Lawn Tennis Club is currently underway", a document that has not been properly considered by LBM nor scrutinised by local residents. As the Borough Character Study 2021 is a key document informing the justification for the inclusion of Site Wi3 in the Site Allocations for Policy Wimbledon N9.1, I would request the Inspector to ask LBM to review and re-write the Study as appropriate to comply with NPPF policies, London Plan policies, and to the other policies at the heart of the new Local Plan dealing with the Historic Heritage of the Wimbledon Park area, or alternatively, ask for the withdrawal of Site Wi3 of the Site Allocations altogether.	Noted. No change proposed. Merton's borough character study SPD, adopted in June 2021, forms guidance for the existing and new local plan. It contains reference to the NPPF, London Plan and other policy areas. Merton's Borough Character SPD was one of many factors that informed the proposed allocation of site Wi3
4	AveryL	12 Places and spaces in a growing borough	D12.11		I live in Wimbledon (off W/don Hill Road) & am a member of the local residents association that covers this area (WEHRA). Consequently I was copied on the excellent representation our WEHRA Planning Officer sent to yourselves (re the above) I agree 100% with everything that was said in this representation. However, would ask that (moving forward) Merton consider the very real issue of flooding we have witnessed in our area (ie when moving to the next stage). This has been dramatically demonstrated in recent months (with both the Raynes Park Bridge section & the area outside the Bus Terminal in Colliers Wood getting coverage on BBC London News). Even before the climate change escalation, I have been concerned about the impact of basement builds in my immediate area, not least because my house is located at the bottom of W/Don Hill. And, as we all know ...water runs down hills (!) & then congregates at the bottom. And the newly installed sunken garden @ the corner of Woodside has done absolutely nothing to counteract this. So with basement builds added to the mix & with many front gardens concreted over 100% (ie those that were done before the law came in forbidding this) the soil areas (for water to drain into) is massively depleted. The water table in Wimbledon is high, which also exacerbates the flooding issue. And I detail the following, by way of an example, of what has happened over recent years within a few minutes' walk from my house: 1. Wimbledon Library: Their basement was once flooded so badly that the water level rose to the height of the keyhole. 2. Health Zone: Immediately opposite the Library, this establishment has had basement flooding on three occasions. The last time it was flooded so badly that the final cost (to themselves) was in the region of £100K. All their treatment rooms (contained in the basement) needed replacing (including their equipment) + there was the loss of income whilst the work was taking place & (of course) they then saw their insurance premiums rise considerably. However, despite being alerted to all the above, as recently as end 2019 the Planning Division completely ignored the potential flooding dangers and granted the owners of the listed Bank Buildings (at the base of Wimbledon Hill Road) permission to build a DOUBLE basement build from the corner of Alwyne Road to the corner of Compton Road. This double basement build will occupy a massive amount of land & will (of course) be "cased". Which means that flood water will be displaced into surrounding homes & gardens. And as if more evidence of the dangers of basement builds were needed, when a while back a water pipe broke in Finsbury Park & flooded the surrounding homes/shops causing huge amounts of water damage (with resultant high costs to resolve & taking many months to implement) local residents/shop owners firmly laid the fault for the excessive amount of damage caused at the door of their local Council, who had given approval for numerous basement builds in the immediate area. Many Councils are now restricting the building of basements in areas prone to flooding (which Wimbledon is). And I would therefore ask that Merton Council act similarly responsibly when moving forward to the next stage of the Wimbledon Town Plan.	No change proposed. In considering applications for basements, the council has to strike a balance between making efficient use of land, particularly in conservation areas where above ground development is restricted, and ensuring the new development does not harm local amenity, including flood risk that is already rising due to climate change. The council's future planning policy on basements and also the basement and subterranean development SPD https://www.merton.gov.uk/Documents/yes_basement_andsubterranean_planning_guidance_2017.pdf require proposals for basements and subterranean developments to assess their impact on flooding from all sources, drainage, groundwater conditions and will only permit developments that do not cause harm to the built and natural environment, local amenity and do not result in flooding or ground instability.
5	Aviva Life and Pensions UK Limited	06 Raynes Park	N6.1		These representations are submitted on behalf of Aviva Life and Pensions UK Limited (c/o Aviva Investors) in response to the consultation on the Stage 3 Draft Merton Local Plan. Aviva Investors are a key stakeholder in the Borough, with longstanding aspirations to redevelop a site at 80-86 Bushey Road, Raynes Park ('the Site'). These representations build upon those submitted during previous consultation on Merton's emerging Local Plan (namely during the consultation of Stage 1, Stage 2, and Stage 2A submitted in January 2018, January 2019, and February 2020 respectively). These representations to the Stage 3 Draft Local Plan should be read alongside these previous submissions. The Site remains one of the largest underutilised, brownfield, single ownership sites in the London Borough of Merton (LBM) and has significant redevelopment potential – as is recognised in emerging local planning policy with the proposed allocation for development. Aviva Investors continue to be committed to bring forward the Site for development. To ensure its successful delivery it is essential there is sufficient flexibility in the policy framework to ensure that this allocated site is delivered, and the maximum benefits associated with this are realised. It is in this context that these representations have been prepared.	Noted

5	Aviva Life and Pensions UK Limited	06 Raynes Park	RP4	<p>This draft policy supports investment in Raynes Park to maintain its position as an attractive and interesting destination that meets the needs of the current and future residents.</p> <p>We continue to be in support of this overall approach for Raynes Park together with the continued allocation at 80-86 Bushey Road (Site Allocation RP4) for development. We do however believe there remains an opportunity for greater flexibility in this site's potential and its ability to deliver a wide mix of uses. Indeed, it is important to recognise that the part of the Site already comprises existing retail floorspace, and LBM has previously granted consent for the redevelopment of the Site for retail purposes</p> <p>Therefore, the Site's potential as a retail destination has long been recognised and accepted by LBM and should be reflected in its proposed allocation. Despite this, whilst the proposed allocation refers to commercial development as a suitable location, elsewhere the emerging Local Plan (para. 6.1.10) highlights that the Council will not support further significant out-of-centre retail development at Shannon Corner. We believe that as an established retail destination, where LBM has accepted as suitable for retail-led development, retailing in this location should be deemed appropriate (subject to the relevant 'tests' being satisfied). Likewise, reflecting the fact it comprises a designated Locally Significant Industrial Site (both within the adopted and emerging Local Plan), together with policies elsewhere that seek to meet demand from business and industrial uses, the Site's potential for continued industrial / business uses should also be fully recognised. Within this context, it is important that full flexibility is provided within the wording of the proposed site allocation to ensure its delivery. Therefore, we would suggest the following revised wording in respect of the Site's allocation (additional text in bold and underlined): <u>Residential-led mixed-use development with potential for ground and lower floors Suitable for a mix of uses with the potential for residential, commercial (including retail, subject to the relevant tests being met), business, industrial, services and local</u> community uses appropriate in this area <u>to a residential area.</u>" This more flexible approach reflects the existing uses on site and its planning history. It also increases the Site's development potential to ensure that this prominent brownfield site can be comprehensively delivered and can respond to demands, both from the market and local needs.</p>	<p>No change proposed. The proposed allocation of <i>Residential-led mixed use development with potential for ground and lower floors commercial, business, services and local community uses appropriate to a residential area</i> is already very flexible, is based on Aviva Investor's Ltd previous submissions to Merton's Local Plan at Stage 2 and 2a and the representor states that the previous representations should be read alongside this. The proposed allocation already incorporates scope for "commercial" development on lower floors which covers issues such as light industrial or retail appropriate to meeting policy tests and recognising the extant permission for retail on this site. The site is allocated in Merton's 2014 Local Plan and, aside from a Next at Home, and a planning permission secured for 16,000 square metres of retail and associated businesses has remained partly derelict and substantially undeveloped. The council would welcome the landowner bringing this site forward and proposes a flexible allocation based on their representations at Stage 1, stage 2 and Stage 2a to support this.</p>
5	Aviva Life and Pensions UK Limited	06 Raynes Park	RP4	<p>There also remains a need for recognition that the Site does have the potential to deliver high density development, including the potential for tall buildings. Indeed, planning permission has recently been granted at appeal2 for residential-led development at a nearby site within the Raynes Park area (at 265 Burlington Road). The scheme allowed by the Inspector includes two residential blocks of development ranging in height between 7 and 15 storeys.</p> <p>In granting consent for buildings at this height, the Inspector concluded (para. 44) that: "...overall, I consider that the proposed scheme would not adversely affect the character and appearance of the area."</p> <p>There are similarities between the appeal site and the Site, and the position reached by the Appeal Inspector that locations elsewhere in the Borough could be suitable for tall buildings needs to be reflected by policies in the new Local Plan. This is the case in relation to Site Allocation RP3 of the emerging Local Plan, which includes the appeal site, where it is acknowledged that the site, through a master planned approach, could contain taller buildings. Similar recognition to the potential for high density / tall buildings should also be outlined in respect of Site Allocation RP4 (80-86 Bushey Road). This will ensure that its development potential is fully optimised.</p>	<p>No change proposed. At Stage 3 Merton's Local Plan, the council recognised that sites that were capable of being masterplanned may be able to accommodate tall buildings such as for Site RP.3 under "approach to tall buildings" (page 233) the plan said The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings"</p> <p>However representations received from the Mayor of London clarified that the council was not in general conformity with the London Plan on this approach and would be brought into conformity by only identifying specific locations for taller buildings within the Local Plan. Therefore, in order to be in general conformity with the Mayor's London Plan, the council has been required to revise its approach to tall buildings and recommend a Main Mod to the Inspector, which removes the tall building requirements from sites that are capable of being masterplanned. Therefore the taller building approach will be removed from site RP.3 and other similar sites to bring Merton's Local Plan into general conformity with the London Plan.</p>
5	Aviva Life and Pensions UK Limited	06 Raynes Park	RP4	<p>In terms of specific comments in respect of the proposed Site Allocation, as set out in our previous representations, we continue to dispute reference to the Site having a Public Transport Accessibility Level (PTAL) rating of 1 (i.e. very poor access to public transport). As previously outlined, the Site has previously been acknowledged3 as having a PTAL rating of up to 3 ('moderate'). We maintain that this needs to be reflected in the site allocation description</p>	<p>Agreed. Factual amendment to Site RP4 at page 236 in the row Public Transport Accessibility Level (PTAL) - The site ranges from PTAL 1 very poor access to public transport to PTAL 3 moderate access to public transport</p>
5	Aviva Life and Pensions UK Limited	06 Raynes Park	RP4	<p>It also worth noting that the post code for the Site is incorrect and should be SW20 0JQ rather than SW20 0WJ as currently drafted.</p>	<p>Agreed factual amendment to postcode</p>
5	Aviva Life and Pensions UK Limited	11 Housing	H11.1	<p>We welcome the revision to criterion (f) of Policy H11.1 (formerly draft Policy H4.1), which now sets a minimum affordable housing requirement for the development of 10no. dwellings on non-public of up to 50% with a minimum provision of 35%. This represents a decrease from a minimum provision of 40% set out in the Stage 2A Draft Local Plan to the Merton Local Plan and is now consistent with the London Plan.</p> <p>However, criterion (f) of Policy H11.1 sets the tenure split for affordable housing for development of 10no. dwellings or more. This continues to consist of 70% low-cost rent (i.e. social rent; affordable rent) and 30% immediate rent (i.e. affordable home ownership; intermediate rent). As set out in our earlier submissions, such an approach reduces the ability to meet 'all sectors of the community and at all stages of people's lives', which remains a key objective of this Policy. The proposed approach towards the tenure split also continues to be inconsistent with the now adopted London Plan (March 2021). Given this, our previous representations in respect of the affordable housing tenure split remain applicable. Reflecting London Plan policy it is appropriate to amend the table within Policy H11.1 as follows (additional text in bold and underlined): [see original response for the full table - only proposed amendments are illustrated here in text form]</p> <p><u>"Affordable housing level for 10 or more units - For all other sites up to 50% with a minimum provision of 35%"</u></p> <p><u>"Affordable housing tenure split - 70% 30% low cost rent (i.e. social rent, affordable rent, London living rent) 30% intermediate; 40% selected on a scheme by scheme basis"</u> The suggested amendments will ensure a sound and effective Plan and one that assists in meeting the housing needs of all sectors of the community.</p>	<p>No change proposed. Merton's policy on housing choice has been robustly developed and informed by evidence including the London Plan, Merton's Strategic Housing Needs Assessment 2019 and Merton's affordable housing viability study 2020. The GLA consider the policy as drafted to be in general conformity with the London Plan.</p>
5	Aviva Life and Pensions UK Limited	11 Housing	H11.3	<p>The wording of this policy is consistent with that outlined in the earlier draft policies (formerly Policy H4.3). As such, our previous concerns remain applicable. It is essential that greater flexibility is provided within the wording of Policy H11.3 and its supporting text. Within this context, we maintain that the relevant text of Policy H11.3 be amended as follows (additional text in bold and underlined):</p> <p><u>"The indicative borough level housing mix will be applied on a site-by-site basis</u> having regard to relevant factors, including individual site circumstances, site location, <u>constraints, identified local needs, viability and economics of provision.</u></p>	<p>No change proposed. The additions are already covered in the current drafting (e.g. economics of provision will include viability considerations; site circumstances could include opportunities or constraints) and there is no need for repetition.</p>
5	Aviva Life and Pensions UK Limited	11 Housing	H11.3	<p>The supporting text to draft Policy H11.3 also needs to acknowledge the important role 1-bed properties play in providing housing for concealed households (house shares) and downsizers, which free's up family housing (i.e. with front doors and gardens). The Local Plan also needs to recognise that the provision of a smaller unit mix may be appropriate in suitable locations and / or sites considered suitable for higher densities and / or tall buildings.</p>	<p>No change proposed. The housing mix policy is based on robust evidence including Merton's Strategic Housing Needs Assessment</p>
5	Aviva Life and Pensions UK Limited	11 Housing	H11.7	<p>Policy H11.7 ('Build to rent')</p> <p>Many of the changes suggested in our previous representations have been incorporated within revised wording to policy. We welcome this. However, criterion (g) of draft Policy H11.7 continues to state that the Council's nomination rights to secure nomination of tenants to specified affordable housing units and the management and monitoring arrangements will be secured via the S106 legal agreements. It also states that all affordable housing elements of the scheme must be affordable in perpetuity. Such an approach under this criterion continues to be inconsistent with both the London Plan and the NPPF and should be deleted.</p>	<p>No further changes proposed. Merton have worked closely with the GLA in the preparation of policy H11.7 and the GLA have formally confirmed that policy H11.7 is consistent and in conformity with the London Plan.</p>
5	Aviva Life and Pensions UK Limited	11 Housing	H11.1(f)	<p>However, criterion (f) of Policy H11.1 sets the tenure split for affordable housing for development of 10no. dwellings or more. This continues to consist of 70% low-cost rent (i.e. social rent; affordable rent) and 30% immediate rent (i.e. affordable home ownership; intermediate rent). The proposed approach towards the tenure split also continues to be inconsistent with the now adopted London Plan (March 2021).</p> <p>Amendments suggested regarding 10 or more units threshold requirement: 30% low cost rent; 30% intermedate and 40% selected on a scheme by scheme basis</p>	<p>No further change proposed. Policy H.11 has been prepared in conformity with the London Plan Policy and is supported by robust local housing needs evidence and a viability study. The GLA have formally confirmed that the policy is in conformity with the London Plan.</p>

5	Aviva Life and Pensions UK Limited	11 Housing	H11.3		<p>It is essential that greater flexibility is provided within the wording of Policy H11.3 and its supporting text.</p> <p>Suggested amendments (bold text) to Policy H11.3: "The indicative borough level housing mix will be applied ona site-by-site basis having regard to relevant factors, including individual site circumstances, site location, constraints, identified local needs, viability and economics of provision."</p> <p>The supporting text to draft Policy H11.3 also needs to acknowledge the important role 1-bed properties play in providing housing for concealed households (house shares) and downsizers, which free's up family housing (i.e. with front doors and gardens). The Local Plan also needs to recognise that the provision of a smaller unit mix may be appropriate in suitable locations and / or sites considered suitable for higher densities and / or tall buildings.</p>	<p>No further change proposed.</p> <p>The suggested additional text to both policy H11.3 and the supporting text is considered unnecessary.</p> <p>Addition of the suggested word indicative would undermine the intent and purpose of policy H11.3.</p> <p>The policy requirements apply to all relevant development proposal. The individual site circumstances listed are not intended to be exhaustive and broadly set out how the mix will be applied. Viability is covered by economics of provision, similarly constraints are covered under individual site circumstances. Further guidance is also set out comprehensively on this matter in supporting text paragraphs 11.3.9 and 11.3.10.</p> <p>No change is proposed concerning the addition of the suggested supporting text. Both Policy H11.3 and its supporting paragraphs clear acknowledge the importance and the justification for requiring residential development proposals to contribute to meeting the needs of different households such as families with children, single person households and older people by providing a mix of dwelling sizes. The housing mix sets out an equal mix requirement of 1,2 and 3+ beds.</p>
5	Aviva Life and Pensions UK Limited	12 Places and spaces in a growing borough	12.6		<p>Tall buildings are now dealt with under a specific policy whereas previously such development was considered under a wider placemaking and design policy (draft Policy D5.1). This Policy continues to identify town centres locations as the most suitable location for tall buildings. However, we welcome the greater flexibility now proposed in acknowledging that tall buildings can also be suitable on other sites elsewhere in the Borough, which will be appraised on a case-by-case basis. Despite this flexibility, criteria (p) to (r) of Policy D12.6 states that the Council will generally support tall buildings if they are in Wimbledon, Morden, and Colliers Wood. There is no suggestion within the criteria listed under this Policy that tall buildings elsewhere will also be supported by the council. Such an approach fails to acknowledge that tall buildings outside of the town centres can be delivered that are of a high quality. Tall buildings can also complement the existing building context and, importantly assist in meeting the Borough's needs. This needs to be clearly recognised by policies within the Local Plan. Tall buildings outside the three town centres in the Borough have a role to play helping Merton accommodate its expected growth. It is essential that such opportunities are fully explored in appropriate locations, particularly for large sites, and that local planning policy provides sufficient flexibility to deliver such development. As recognised by the Inspector in dealing with the recent Burlington Road appeal, current adopted local planning policy provides scope for the decision maker to exercise judgement on the impact of tall buildings on site-by-site basis. Emerging local planning policy needs to maintain such an approach given the need to fully optimise the development potential of brownfield sites within the Borough.</p> <p>To address our continued concerns, we propose that an additional criterion is added to Policy D12.6 that acknowledges that tall buildings can be acceptable outside the three principal town centres in the Borough subject to being of a high quality in design – as has been reflected by the Planning Inspectorate in granting consent for tall buildings outside the three town centres at Burlington Road. The suggested wording for this additional criterion is provided below: "Elsewhere in the Borough, they are sited and designed in accordance with a detailed townscape strategy being sympathetic to their surroundings and accord with the policies in the Plan." Such an approach will ensure that the Local Plan is planned positively and seeks to meet the area's needs and maximising the potential of the development opportunities that do exist, as required by the NPPF and the London Plan.</p>	<p>No change proposed. At Stage 3 Merton's Local Plan, the council recognised that sites that were capable of being masterplanned may be able to accommodate tall buildings such as for Site RP.3 under "approach to tall buildings" (page 233) the plan said The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings"</p> <p>However representations received from the Mayor of London clarified that the council was not in general conformity with the London Plan on this approach and would be brought into conformity by only identifying specific locations for taller buildings within the Local Plan. Therefore, in order to be in general conformity with the Mayor's London Plan, the council has been required to revise its approach to tall buildings and recommend a Main Mod to the Inspector, which removes the tall building requirements from sites that are capable of being masterplanned. Therefore the taller building approach will be removed from site RP.3 and other similar sites to bring Merton's Local Plan into general conformity with the London Plan.</p>
5	Aviva Life and Pensions UK Limited	13 Economy	TC13.6		<p>Policy TC13.6 ('Development of town centre type uses outside town centres') This Policy broadly reflects the NPPF and the London Plan in requiring retail development in edge and out-of-centre locations to satisfy the requirements of the sequential approach to site selection, and where necessary, the impact test. However, the details of the proposed approach of this Policy lacks the necessary clarity. The wording of the Policy states that development of town centre uses will be permitted only where it can be demonstrated that: "The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment submitted is proportionate to the scale of the development proposed and satisfies the council's requirements." The council's requirements to be satisfied referred to in this policy are not provided. Clarity is needed to make this policy effective.</p>	<p>No change proposed. The council's requirements are included in the appendices at page 628. However the sequential test and impact assessment has been mistitled under flood risk. A minor mod will be proposed to retitle the requirements and reference this in the policy.</p>
5	Aviva Life and Pensions UK Limited	13 Economy	TC13.6	13.6.5	<p>Furthermore, the supporting text to this Policy (para. 13.6.5) goes on to state that: "Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area exceeds 280sqm. In accordance with the National Planning Policy Framework 2019 (NPPF), impact assessments will be required for leisure and office development above 2,500 sqm located outside town centre and not in accordance with the development plan." Again, the council's proposed approach for assessing retail impact lacks clarity. Whilst the policy approach reflects (in part) national and strategic policy in only requiring impact assessments for development above 2,500 square metres, it does state that impact assessments 'may' be required for proposals that exceed 280 square metres. No information is provided as to what circumstances will mean that an impact assessment will be required in support of proposals above 280 square metres. Likewise, no justification has been provided to support this lower threshold when considering retail impact, other than references to this scale of unit being 'large' or a spurious reference to the changes to the Use Class Order that came into effect in 2020. This fails to provide the robust justification required to support a lower threshold to the default set by both the NPPF and the London Plan. Indeed, the Planning Practice Guidance (PPG) that supports the NPPF states that: "In setting a locally appropriate threshold it will be important to consider the: - scale of proposals relative to town centres - the existing viability and vitality of town centres - cumulative effect of recent developments - whether local town centres are vulnerable - likely effects of development on any town centre strategy - impact on any other planned investment" No such evidence has been published (or at least in the public domain) to support the lower threshold of 280 square metres. The Retail and Town Centre Capacity Study published in August 2011, which forms part of the council's evidence base informing the Local Plan, did suggest that the impact on all out-of-centre retail applications over 280 square metres should be assessed. However, this recommendation was not based on any robust justification other than reference to the Sunday Trading Act. Furthermore, this study is also over 10 years old. In short, no robust and up-to-date evidence has been prepared to support a lower threshold, contrary to the PPG. In the absence of such evidence, Policy TC13.6 and the supporting text is not justified and needs to be amended to clarify that it is only necessary to assess retail impact for proposals outside existing centres above 2,500 square metres.</p>	<p>No change proposed. The figure of 280sqm is based on an analysis of town centre characteristics and other factors listed in the PPG, including the size of existing and proposed developments. Most developments in Merton's town centres are small scale and most town centres have the majority of retail premises of c280 sqm and definitely less than 1,000 sqm. Merton's Retail and town centre study 2011 and other evidence lists the floorspace size of the limited number of large (+280sqm) developments in Merton and although this study is 10 years old, Merton's successive monitoring reports informed by Merton's annual shopping survey and commercial database demonstrate that a very limited number of new retail premises have been built in Merton in the last 10 years. Were Merton to allow up to 2,500sqm of retail to progress without a sequential test or impact assessment, this would be a very large amount in comparison to the retail in Merton's town centres. In line with the NPPF and London Plan's "town centre first" approach larger retail proposals should submit a sequential test and impact assessment</p>
5	Aviva Life and Pensions UK Limited	all			<p>Aviva Investors, as key investor in Merton, remains committed to the early delivery of one of the largest and most prominent brownfield sites in the Borough at 80-86 Bushey Road, and we support the continued allocation for development in the emerging Local Plan. However, to ensure that its development potential is maximised, the policy amendments identified are required to ensure the Local Plan is positively prepared, justified, and effective. As currently drafted, the emerging Local Plan has the potential to limit the development potential of the strategic allocation at 80-86 Bushey Road, despite this being one of the largest brownfield sites under single ownership in the Borough. We trust that these representations will be given due consideration by the Council and helpful in progressing the Local Plan. In the meantime, please do not hesitate to contact us if there are any queries.</p>	<p>Noted. The council will welcome investment in 80-86 Bushey Road and the statement by Aviva Investors to commit to early delivery, although there is no representation from Aviva Investors that proposes the site to come forward for delivery earlier than the 5-10 years that is currently stated in the Stage 3 local plan. The site is allocated in Merton's 2014 Local Plan and much of it remains semi-derelict. It is one of the largest single ownership sites in Merton and is allocated for a wide range of uses.</p>
6	Battles Area Residents Association (BARA)	01B Good Growth			<p>Good Growth Strategy We broadly agree with the Good Growth Strategy but believe that in promoting development, greater emphasis needs to be placed on protecting and enhancing neighbourhood character. We accept that it is necessary to make the best use of land and buildings but are concerned that the focus on densification may impact on the character and quality of existing neighbourhoods and residential amenity unless carefully managed.</p>	<p>Noted. No change proposed. The first sections within Merton's Good Growth Strategy focus on tackling the climate emergency, healthier and green environments and other factor that are key to a successful neighbourhood. The section on making the most of our limited land (ch01b page 13) states <i>We will promote and ensure the most efficient use of land and development while also looking to improve the quality of our environment, protect the amenity of occupiers, neighbours and meet planning aims. It is important that development delivers not only homes, but also the infrastructure to support the new homes, employment and business spaces which create resilient and sustainable communities. Applying a design-led approach to determine the optimum development capacity of sites is essential to improve the quality of our environment (physical and natural), protect the amenity of occupiers, neighbours and meet planning aims.</i></p>

6	Battles Area Residents Association (BARA)	01B Good Growth			The plan states that neighbourhoods such as South Wimbledon will 'generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting'. This needs to be qualified. Higher densities must not be taken as a 'given' and in bringing forward development proposals, an appropriate density must be established through the adoption of a design led approach which takes full account of local character and context. This is consistent with Policy D3 of the Publication London Plan (December 2020) which makes it clear that optimising site capacity means ensuring that development is of the most appropriate form and land use for the site and responds to its context and infrastructure capacity.	No change proposed. Ch01b Good Growth Strategy page 14 states We will expect high quality developments with higher densities, where appropriate, that can appropriately be delivered by the efficient use of land, particularly in neighbourhoods with good accessibility to public transport and in Merton's Opportunity Area. In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect densities towards the higher end, considering aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough's acute housing needs. " This follows earlier references in the good growth strategy to the merits of applying a design led approach.
6	Battles Area Residents Association (BARA)	01B Good Growth			Particular care also needs to be taken in identifying locations suitable for tall buildings. In accordance with the Secretary of State's Direction on the London Plan in December 2020, tall buildings should only be brought forward in appropriate and clearly defined areas whilst still enabling gentle density across London.	Noted. In discussions with the GLA, changes are proposed to Chapter D12 and Policy D12.6 for tall buildings. A Main Mod is made to ensure this is in general conformity with the London Plan.
6	Battles Area Residents Association (BARA)	01B Good Growth			We support the promotion of healthy and active neighbourhoods with a range of activities including access to quality green space and leisure facilities and the concept of the 20 minute neighbourhood. We believe such a neighbourhood can be created in South Wimbledon with the revitalisation of the Local Centre, enhancement of green spaces and public realm improvements.	noted.
6	Battles Area Residents Association (BARA)	01B Good Growth			The Key Diagram identifies the Wimbledon/Colliers Wood/South Wimbledon Opportunity Area as Merton's main growth area. It must be made explicit, however, that this is a very broad area and development opportunities are focused in particular locations. Extensive areas within the OA are not suitable for large scale development or change.	Noted. No change proposed. Local Plans will help define the boundaries of London's Opportunity Areas (as defined in the London Plan 2021) and we agree that this does not mean that everywhere within each boundary (e.g. parks and open spaces, schools, health centres, established residential neighbourhoods) is available for development. As stated in chapter 01b Good Growth strategy, the council will work with local communities, partners, businesses etc and the GLA to produce an opportunity area planning framework which will set out the specific opportunities in more detail. This is subject to GLA funding.
6	Battles Area Residents Association (BARA)	01B Good Growth			We are supportive of the key priorities for South Wimbledon set out in Chapter 01B p.20 but would wish to amend the first bullet point as follows: • Making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new homes (especially affordable homes) and affordable and flexible employment floor space provided that new development is respectful of local character and context and the necessary infrastructure is provided to meet the needs of new and existing communities.	No change proposed
6	Battles Area Residents Association (BARA)	01B Good Growth			We would also like to add an additional priority: • Promoting the health and wellbeing of residents through the enhancement of green spaces and improved access to recreational facilities.	No change proposed. This is already covered on page 20.
6	Battles Area Residents Association (BARA)	01C Urban Development Objectives and Vision			We are generally supportive of the Strategic Objectives set out in Chapter 01C and the focus placed on meeting the needs of Merton's communities and tackling climate change. However, we would again emphasise the need to ensure that the necessary infrastructure is provided alongside new development to meet the needs of both new and existing communities and that in seeking to optimise development, a design led approach is adopted which respects local character and context and engages local communities in shaping their neighbourhoods - a key objective of the updated NPPF	Noted. No change proposed. The Local Plan is accompanied by an Infrastructure Study which demonstrates what infrastructure needs to be provided and the policies relating to infrastructure make it clear that new development needs to fund the infrastructure needed to support it.
6	Battles Area Residents Association (BARA)	01C Urban Development Objectives and Vision			Strategic Objective 5: places for people should include a commitment to ensuring that new homes include provision of adequate outdoor amenity space and to providing new and improved green spaces. This is essential in promoting wellbeing. Working with key stakeholders should include working with the local community and ensuring they are fully engaged in shaping their neighbourhood.	Noted. No change proposed. This is already addressed for all developments in the new local plan policy D12.3 "Ensuring high quality design for all developments" which states that "proposals for all development should... (n) Provide outdoor amenity space, whether public, private or communal which accords with appropriate minimum standards, is efficiently laid out and is compatible with the character of surrounding areas." The justification for this policy explains the standards and design
6	Battles Area Residents Association (BARA)	01C Urban Development Objectives and Vision			Spatial Vision We are generally supportive of the Spatial Vision in particular, the focus on addressing climate change and health and income inequality. We would like to see reference to the greening of Merton with an extended network of new and improved green spaces accessible to all and rich in biodiversity, respectful, high quality design and distinctive neighbourhoods	Noted.
6	Battles Area Residents Association (BARA)	02 Climate Change			We note there is no chapter 2 - has that been omitted in error?	There is a chapter 2 - climate change (previously chapter 15 but responses to previous consultations fed back that climate change should be seen as a higher priority in every sense) See link to Reg19 chapter 2 climate change https://www.merton.gov.uk/Documents/02%20Climate%20Change%20Merton%20Local%20Plan%20Reg19%20July21.pdf (there is, however, no chapter 8, and that was an error)
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1		Neighbourhoods: South Wimbledon We welcome that the Council has taken into account our previous representations and the Plan now recognises South Wimbledon as a distinctive neighbourhood. We also note the statement that the Council 'supports developments that enhance the local environment' and we would strongly endorse this.	noted
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1		Boundary of South Wimbledon We are pleased to see the boundary of South Wimbledon has been amended and extended to better reflect the character and homogeneity of the area. However, whilst the revised boundary now includes Wycliffe Road, Ridley Road and Latimer Road, it cuts through the centre of Haydons Road Recreation Ground and excludes the eastern part of Quicks Road and the full area covered by the Battles Area Residents Association. This is illogical particularly the exclusion of half of the recreation ground which is such an important facility and serves the whole of South Wimbledon. We would request that the boundary of South Wimbledon is further amended as shown in red on the following plan extract [see original response for plan extract]	Noted. No change proposed. Haydon's Road Rec is an important feature for many different neighbourhoods and groups. We have located the South Wimbledon / Colliers Wood / Wimbledon boundary bisecting Haydon's Road Rec so that every neighbourhood who identifies with Haydon's Road Rec is part of it. We recognise that this isn't a perfect solution but the representations we've received on the Borough Character Study SPD (June 2021) and on this Local Plan make assigning Haydon's Road Rec to only one neighbourhood tricky. We hope that this approach will allow all local communities to feel invested in, and include, Haydon's Road rec.
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1		We are generally supportive of the objectives for South Wimbledon, however we would like to propose amendments to these as follows: • Add to Improving public realm and public space- enhancing the community and biodiversity value of green spaces'	Agreed. Minor mod: Improving public realm and public space: Support improvements to streetscene and shopfronts, improving the public realm, particularly for pedestrians and cyclists. enhancing the community and biodiversity value of green spaces.
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1		We do not consider the selected photos adequately reflect the heritage and character of South Wimbledon. The CGI of High Path represents future development and does not reflect the existing character. We would like to see some further images of the Local Centre and green spaces.	No change proposed
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1		We are disappointed that no amendments have been made to this Policy in response to our previous representations and we would again request consideration is given to the following amendments. In particular, reference should be included to Haydons Road Recreation Ground given that it has now been recognised by the Local Planning Authority as being within the boundary of South Wimbledon in the Stage 3 Local Plan. We would also suggest that the policy should make clear that South Wimbledon Station has been identified as a site allocation (Ref: W18).	Reference has been added to the Site Allocation W18 for South Wimbledon Station in paragraph 7.1.14. Haydons Road Recreation Ground is already referenced in the supporting text.
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	a	Proposed amendments to Policy N7.1: 'Recognising South Wimbledon as a distinctive neighbourhood in its own right We will do this by: a. Proposing a new and improved Local Centre at the heart of the South Wimbledon, focussed around the underground station and the junction where Morden Road, Merton Road, Kingston Road and Merton High Street meet	no change proposed. Improvements referred to in (c.) (design / local character) (d) (shopfronts) and (e. public realm) of the same policy
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	c	c. Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation which respects heritage assets and local character;	Agree with partial amendment - modification (c.) c. Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation which respects heritage assets
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	d	(d) d. Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;	Agree with proposed amendment which adds clarity and was always the policy intention d. Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	g	g. Protecting and enhancing the public open space at Nelson Gardens and Haydons Road Recreation Ground and improving links to Abbey Rec, Wandle Park and other nearby open spaces	Agree - adds clarity g. Protecting and enhancing the public open space at Nelson Gardens and Haydons Road Recreation Ground and improving links to Abbey Rec, Wandle Park and other nearby open spaces
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	h	(h) h. Support well designed development commensurate with the excellent public transport access of the area of a scale and form which is respectful of local character and context	Agree with part of amendment -(h) Support well designed development commensurate with the excellent public transport access of the area. No change proposed relating to "respectful of local character and context" as the South Wimbledon neighbourhood has a wide range of built form and characteristics, not all of which are of merit to respect
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	j	j. Work with Integrating the regeneration phases being delivered on the High Path estate over the next 10- 15 years and ensuring the development enhances the local environment , guided by the Estates Local Plan; this includes the proposed public park at High Path;	Agree with part of amendment (j) Integrate the regeneration phase being delivered on the High Path estate over the next 10-15 years guided by the Estates Local Plan to ensure the development enhances the local environment , this includes the proposed public park at High Path.

6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1	k	k. Supporting Promoting an appropriate development at South Wimbledon station (Site Allocation Wi8) which respects and enhances the Grade II listed building, heritage asset and other local heritage assets within the area, improves the station facilities and delivers a range of benefits including a public space, cycle parking and secondary pedestrian entrance to the underground station'.	Agree with part of amendment (k) Supporting development at South Wimbledon Station (Site Allocation Wi8) which respects and enhances the Grade II listed building and other heritage assets within the area delivers a range of benefits including a public space, cycle parking, improved station facilities and a secondary pedestrian entrance to the underground station
6	Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1		Add additional objective- Enhancing local character and heritage: Promote new development which respects and enhances local character and opportunities to celebrate the area's unique local heritage	No change proposed. As demonstrated in the Borough Character Study and the Estates Local Plan in particular, South Wimbledon neighbourhood contains a wide variety of different characters, from established Victorian streets to modern industrial estates, with the 1950s-1980s high Path estate at its heart. Character varies across the South Wimbledon neighbourhood; in some places development should respect and enhance existing local character and in others it will be creating a new character
6	Battles Area Residents Association (BARA)	09 Wimbledon	Wi1		Site Allocations We would comment as follows on the sites that directly impact South Wimbledon: Site Wi1 Battle Close, North Road, Wimbledon SW19 1AQ Whilst outside the BARA area, we would nonetheless like to comment on this allocation because of its wider importance to the local community. We are concerned that as currently drafted, the site allocation could allow for a purely residential development without any community uses. Given the previous leisure use of the site, we believe it is important to ensure some re-provision of leisure and community uses in any future development. As it is a council owned site, the Council has the opportunity to promote an exemplar scheme which promotes their commitment to health and wellbeing and other policy objectives in the Local Plan. We would therefore propose that the site allocation should be amended as follows: Any of the following uses or a suitable mix of community (including education), sport/leisure facilities and residential	No change proposed. The council's Infrastructure Needs Assessment, including playing pitch strategy, does not identify particular needs for community (including education) sports or leisure facilities on this site. The site is bounded to the north by a primary school; a new secondary school has been built at South Wimbledon. The previous leisure provider closed the site and there are other leisure facilities in the area (both council run and private)
6	Battles Area Residents Association (BARA)	09 Wimbledon	Wi8		Site Wi8: South Wimbledon Station It is unclear why Site Wi8 (South Wimbledon Underground Station) has been included in Wimbledon rather than South Wimbledon and we would propose that it should be moved to the latter section of the Plan for ease of reference. The redevelopment of this important site needs to be very carefully handled given the site constraints. We would therefore suggest that a masterplan is required to show how it would integrate with the Local centre and wider area and the site allocation be amended to reflect this. The future of this site is key to the regeneration of South Wimbledon and it must not be considered in isolation. The Council should work in collaboration with Transport for London in the preparation of the masterplan and development proposals. The local community should be fully engaged from the outset in shaping proposals and this should be referenced in the site allocation	No change proposed. Site Wi8 South Wimbledon station is a key site for South Wimbledon - for the heritage asset and transport hub of the station at a focal point in the neighbourhood. However the site is very small - 0.2ha - and would not be suitable for a masterplan. The current and new local plan requires all developers to engage with local communities prior to submitting major planning applications
6	Battles Area Residents Association (BARA)	10 Health and Wellbeing			Health and Wellbeing We welcome the Council's commitment to promote more active and healthier lifestyles and to tackle the causes of ill health and health inequalities in Merton. This adds further weight to the case for improving access to sport and recreational facilities and for the refurbishment of existing facilities and the need for the reinstatement of Policy O8.5 in the Stage 2a Draft Local Plan	The Sport and Recreation policy (previously O8.5, now IN14.3) has been moved to the Infrastructure chapter and is Sport and Recreation where it is more suitable and effective than the Green and Blue infrastructure chapter. It has not been deleted from the Local Plan. No further action required.
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough			We support the objective of sustainable, efficient and high quality design. However, it must also be respectful of context and character and maintain and enhance local distinctiveness.	Noted
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.1		Strategic Policy LP D12.1 Delivering well designed and resilient neighbourhoods An additional criterion should be added relating to the capacity of local infrastructure to accommodate development and the need to ensure that necessary infrastructure is provided to meet the needs of new development as they arise. This is consistent with London Plan Policy D3.	No change proposed. This is already addressed for all forms of development in Chapter 14, Infrastructure, including Strategic Policy IN14.1 which states <i>We support the provision and improvement of infrastructure across the borough and will work with relevant providers to ensure that the necessary infrastructure is secured to support growth in the borough over the plan period. We will:</i> <i>a. Expect new development to identify, plan for and provide any necessary infrastructure and require that, where necessary, infrastructure should be completed prior to occupation.</i> <i>b. Work with service providers and partners to enable them to deliver the provision of services and facilities for the projected population growth, especially in areas of significant new homes and areas of deficiency.</i> <i>c. Encourage dialogue between service providers and developers. Where appropriate opportunities arise, the co-location of services and joint delivery of infrastructure by service providers will be supported</i> And has four subsequent criteria addressing infrastructure provision
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.2		Criterion d should be expanded to state that all proposals for new development should demonstrate how local context and character has been taken into account and how the new development will enhance local character and distinctiveness.	No change proposed. This is already addressed in Policy D3 "Ensure high quality design for all developments" which states at (a) <i>take a design-led approach to development that responds to the site's context and character</i> ". It is also referred to in the justification of policy D2 good urban design which states in paragraph 12.2.1As <i>recognised in Policy D3 of the London Plan, developments must take a design-led approach that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Merton's Borough Character Study provides an analysis of character borough wide and should be used to supplement bespoke site analysis</i>
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.2		An additional criterion should be added to ensure that provision for future management and maintenance of public realm is secured through new developments.	No change proposed. Maintenance of the public realm is addressed in Policy D2 urban design (under the heading "public realm") (r.) which states <i>Use permeable paving, good-quality construction materials, appropriate tree planting (including shrubs) and landscape design which responds positively to the character of the area and is easy to maintain</i> ". However requiring new developments to provide for the future management and maintenance of all public realm (i.e. including that which served existing communities) would not meet the legal tests for planning obligations.
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.3		We would like to see a stronger reference to the need to demonstrate that local context and character has been fully assessed and respected in development proposals.	No change proposed. This is already addressed in Policy D3 "Ensure high quality design for all developments" which states at (a) <i>take a design-led approach to development that responds to the site's context and character</i> ". It is also referred to in the justification of policy D2 good urban design which states in paragraph 12.2.1As <i>recognised in Policy D3 of the London Plan, developments must take a design-led approach that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Merton's Borough Character Study provides an analysis of character borough wide and should be used to supplement bespoke site analysis</i>
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.3		Given the current problems arising from waste in South Wimbledon and throughout the Borough, we welcome the reference to adequate provision of refuse facilities and the identification of a suitable locations for bins and recycling in all developments. This applies particularly when residential properties are sub-divided. When there is no or inadequate provision for waste, rubbish accumulates on the streets to the detriment of the whole environment. This has an adverse impact on the quality of neighbourhoods and results in a loss of civic pride. There is express reference to the disposal of construction waste and we would like to see similar reference to general household and commercial waste included in this policy.	No change proposed. Officers agree that inadequate refuse storage or incorrect use of household refuse storage is a problem and a blight for some parts of the borough, particularly near busy roads, for homes above shops and where new homes have been created under permitted development rights (known as prior approval). This includes in parts of South Wimbledon such as Merton High Street. However while the local plan can contain policies that will help with construction waste management for sites that need planning permission (part aa of this policy) and bin storage (part v of this policy) the Local Plan does not influence homes built under permitted development rights / prior approval nor does it influence the management of household waste.
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.4		An additional criterion should be added which requires new development to respect and enhance heritage assets.	No change proposed as this is covered elsewhere in the Plan in Policy D.12.5 "Managing heritage assets" including part b. which states "All development proposals associated with the borough's heritage assets or their setting will be expected to demonstrate, within a Heritage Statement, how the proposal conserves, and where appropriate enhances the significance of the asset in terms of its individual architectural or historic interest and its setting.
6	Battles Area Residents Association (BARA)	12 Places and spaces in a growing borough	D12.6		Policy D12.6 Tall Buildings We support the proposal to only permit tall buildings in Wimbledon, Colliers Wood and Morden town centres. However outside town centres, it must be acknowledged that taller buildings (up to 6 storeys) can impact on the character of an area and will also need to be carefully sited taking into account local context and good urban design principles.	No change proposed. The siting and design of all developments based on good urban design principles is thoroughly addressed in this chapter and will include buildings that are taller than their surrounds but less than the tall building definition of 6 storeys.
6	Battles Area Residents Association (BARA)	13 Economy	EC13.1		We are supportive of the objective of encouraging business investment and jobs growth, in particular the creation of successful high streets including South Wimbledon Local Centre. Changes in the Use Classes Order and the introduction of new Class E and extended Permitted Development rights need to be considered in protecting employment space and ensuring the future vitality of our high streets. We would like to see more detail about how the Council will support the regeneration of local centres commensurate with the character of the area and providing services to local residents and to work with the Council in bringing forward proposals. Consideration needs to be given to changes in working practices due to the pandemic.	Noted

6	Battles Area Residents Association (BARA)	13 Economy	EC13.4		With changes in working patterns, there is likely to be an increased demand for shared and affordable workspace in the local area. This is also in keeping with the concept of the 20 minute neighbourhood. We would like to see reference to support for shared and affordable workspace for new and expanding small businesses.	This is addressed in Strategic Policy E13.1 (c.) and in EC13.2 Business locations in Merton, particularly (j) <i>Shared workspace and flexible business space</i>
6	Battles Area Residents Association (BARA)	13 Economy	TC13.5		Changes in the Use Classes Order and the introduction of new Class E and extended Permitted Development rights need to be considered in protecting employment space and ensuring the future vitality of our high streets	Noted. Permitted development rights (including prior approval and movement of uses within the Use Class Order) are allowed to happen without recourse to planning policy
6	Battles Area Residents Association (BARA)	13 Economy	T13.9		We support the principle of promoting culture and the arts and see great potential for this in South Wimbledon given its strong local heritage. The history of South Wimbledon is not widely known or appreciated and we would like to see all new developments in the South Wimbledon area to contribute to culture and the arts and a wider programme of events and projects to celebrate local heritage. This should be referenced in the policy	No change proposed.
6	Battles Area Residents Association (BARA)	14 Infrastructure	IN14.2		Policy IN14.2 Social and Community Infrastructure We welcome the commitment to the improvement of social and community infrastructure to support existing residents and to accommodate future growth but would place greater emphasis on the requirement for necessary infrastructure to be provided at the time of need to ensure there is adequate capacity to meet the needs of new and existing residents. The policy should include reference to working with local communities to understand existing provision and future needs and priorities. This reflects the London Plan (Policy S1).	The support for this policy is noted. 1. Paragraph 14.1.1 of the supporting text sets out that where an infrastructure capacity problem has been identified, developers will be required to fund appropriate infrastructure improvements and where necessary ensure these improvements are completed prior to occupation. This will be applicable for all types of infrastructure. 2. Paragraph 14.1.5 of the supporting text includes a reference to working with the community to identify and update requirements for the provision of infrastructure and services throughout the borough. This was amended following comments received to Stage 2a consultation. As policy IN14.1 covers all types of infrastructure, it is considered to be the most appropriate place for this wording. No further action required.
6	Battles Area Residents Association (BARA)	15 Green and Blue infrastructure	O15.1		Strategic Policy O15.1 open spaces, green infrastructure and nature conservation We welcome the Council's commitment to the protection and enhancement of our open spaces and to working with partners to deliver sport, recreation and play facilities. The pandemic has demonstrated how valuable these are to the health and wellbeing of communities	Support noted.
6	Battles Area Residents Association (BARA)	15 Green and Blue infrastructure	O15.2		Policy O15.2 Open Space and Green Infrastructure We are pleased to see the value placed on Green Infrastructure and open spaces and the contribution they make to health and wellbeing, social cohesion and mitigating climate change. We have witnessed at first hand how Haydons Road Recreation Ground has become a focus of community activity and an increasingly important facility for residents of all ages in South Wimbledon. We welcome the policy commitment to protecting designated open spaces from inappropriate development but would like to see O15.2a extended to include protection of open space from 'inappropriate uses'.	The support for this policy is noted. In relation to the proposed wording addition of "inappropriate uses", this is not considered appropriate or necessary as the term "development" is defined in the Glossary and in the Town and Country Planning Act 1990 and includes any material change of use in buildings or land. No further action required.
6	Battles Area Residents Association (BARA)	15 Green and Blue infrastructure	O8.5		Previous Policy O8.5 Sport and Recreation We are disappointed to see the omission of Policy O8.5 and the commitment to helping residents lead healthy and active lifestyles and improving mental wellbeing through sport and recreation. The policy stated that the Council will encourage opportunities for sport, recreation and play and safeguard existing sport and recreation facilities and support proposals for the refurbishment of existing recreation facilities on sites designated as open space. BARA has been campaigning to bring the existing games area at Haydons Road Recreation Ground back into community sport and recreation use and we look forward to working with the Council to achieve this shared objective for the benefit of the South Wimbledon community. The single line added to Policy IN14.1 to the effect that the Council will work with partners to facilitate the delivery of sport, recreation and play facilities and to encourage the shared use of sites and spaces is inadequate and we strongly advocate the reinstatement of Policy O8.5	The Sport and Recreation policy (previously O8.5) was moved to the Infrastructure chapter where it is more suitable and effective than the Green and Blue infrastructure chapter. It has not been deleted from the Local Plan. No further action required.
6	Battles Area Residents Association (BARA)	15 Green and Blue infrastructure	O15.6		O15.6 Wandle Valley Regional Park We support the objective of enhancing the Wandle Valley and maintaining it as a strategic biodiverse and accessible corridor. We would like to see the inclusion of an additional criterion to improve accessibility by foot and cycle to the Wandle Valley from adjacent neighbourhoods	The support for this policy is noted. Policy O15.6(e) includes the following "ensure that new development positively enhances accessibility to the park through improvements to walking and cycling." No further action required.
6	Battles Area Residents Association (BARA)	16 Sustainable Travel	T16.4		Transport and Urban Mobility Policy T6.8 Parking, deliveries and servicing We are supportive of the proposals to promote sustainable transport choices. However, in limiting car parking in new developments it is necessary to consider the impacts on existing communities and the limited capacity of residential streets to accommodate additional parking stress and increased levels of deliveries and servicing activities and how this can be effectively managed	No change proposed. Policies 16.3 "managing the transport impacts of development" and 16.4 "parking and low emissions vehicles" require developers to consider existing residents and businesses when planning for the movements to and from their development. For example 16.4 (c.) states <i>Financial contributions will be sought for new or enhanced parking controls where they are considered necessary to promote road safety and protect existing residential or business amenity.</i>
6	Battles Area Residents Association (BARA)	all			We are extremely disappointed to see that very limited changes have been made to the Draft Local Plan in response to the very extensive representations submitted by BARA in response to the Stage 2a consultation. We are particularly concerned that there is no published record of the Council's response to the comments made by BARA and other consultees which clearly sets out how these have been addressed in the amended Plan and why it has been considered inappropriate for other requested changes to be made. The submission to the Secretary of State of a statement setting out how any representations made pursuant to Regulation 18 have been taken into account is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. The publication of a full report setting out the Council's response would therefore normally be expected at the Regulation 19 stage of Local Plan preparation prior to publication and submission of the Local Plan to the Secretary of State for examination by an independent Inspector. In the absence of this, it is almost impossible to understand how our comments (and the comments of other consultees)	Noted. No change requested. All consultation responses are published online and the council's Borough Plan Advisory Committee considered the initial representations arising from Stage 2a of the Local Plan. All stage 2a comments were considered as part of preparing the final Local Plan at Stage 3 (Reg19)
6	Battles Area Residents Association (BARA)	all			We are also concerned that consultation on the Stage 3 Draft Local Plan should have been undertaken over the summer holiday period - a time which would normally be avoided for important consultation exercises of this nature. An extended time period should have been allowed to provide adequate opportunity to review such a large and complex document and to comment.	Noted. No change requested. Stage 3 / Regulation 19 is the publication stage of the plan and follows more than nine months of public consultation on the draft Local Plan across three years, including two Reg 18 stages (stage 2 (October 2018 - January 2019) and 2a (November 2020 - February 2021)
6	Battles Area Residents Association (BARA)	all			The pandemic has highlighted the importance of communities and neighbourhoods and the need to promote the health and wellbeing of all ages - that means good access to quality green spaces, quality homes and putting people and placemaking at the centre of decision making. As previously stated, whilst we would wish to see a thriving local economy, it is also important to ensure that development protects and enhances local character, strengthens local communities and meets the needs of existing and future residents. This has been highlighted in the updated NPPF published in July 2021 which places even greater emphasis on the importance of design quality and the need to ensure local communities are fully engaged in shaping development in their neighbourhoods. The Stage 3 Local Plan was published on 22nd July (only one day after publication of the updated NPPF) and will clearly need to be amended to reflect the new NPPF prior to examination.	Noted. Modifications are recommended before the Stage 3 submission Local Plan to update the NPPF where there is a difference between the draft NPPF 2019 and the final NPPF 2021.
6	Battles Area Residents Association (BARA)	all			Having reviewed the Stage 3 Local Plan, we are of the view that further changes are required in order for the Plan to meet the tests of soundness and reiterate below our previous comments on the relevant sections and policies which have not to date been addressed in the amendments made. We would also confirm that BARA would wish to attend the relevant examination hearings and to be kept informed of the arrangements for these.	Noted.
7	Bellway Homes Limited	06 Raynes Park	RP6		These representations are submitted by Savills on behalf of our client, Bellway Homes Limited (South London) (Bellway), in response to the London Borough of Merton (LBM) New Local Plan Stage 3 (Regulation 19) consultation	Noted
7	Bellway Homes Limited	06 Raynes Park	RP6		These representations are made specifically in response to the proposed Raynes Park Site Allocation RP6: land at the former LESSA Sports Ground (the site). However, representations are also made to other parts of the New Local Plan Stage 3 (Regulation 19) consultation. This representation <u>objects</u> to the current proposed wording of Raynes Park Site Allocation RP6 as set out in the New Local Plan Stage 3. It is requested that the allocation of Raynes Park Site Allocation RP6 land at the former LESSA Sports Ground is amended so that Site Allocation RP6 in LBM's New Local Plan allocates the site for the following: Site Allocation: Residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land, comprising: 2 tennis courts with ancillary facilities including dedicated parking, a small multi-use games area (MUGA), an outdoor gym, a trim trail, walking/jogging routes; together with publicly accessible open space including a new children's play area and landscaping.	No change proposed. This response requests that the Site Allocation RP6 is allocated for residential with some sporting / leisure uses. The council's Site Allocation is clear that sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. The open space designation is linked to the former use of the site as a Playing Pitch and the site is identified in the Merton Playing Pitch Strategy 2019. The proposed allocation for residential with some sporting leisure is not supported for the following reasons: - The site is identified in the Playing Pitch Strategy with interest shown by a number of sporting bodies and an objection from Sport England. The landowner will need to demonstrate that the entire site cannot be delivered for sporting or community uses before any other uses can be considered. - The applicant has not provided any evidence to indicate that the site no longer meets the Open Space criteria.

7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Background</p> <p>The site, the former Lessa Sports Ground, was previously submitted as part of the 'call for sites' in January 2018, promoting the site for residential development. Representations were also made in support of the site's allocation for residential development during the first stage of Regulation 18 consultations held between October 2018 and January 2019 and the second stage of Regulation 18 consultations held between November 2020 and February 2021. Bellway submitted a full planning application at the site in October 2020 (LPA Ref. 20/P3237) currently seeking to deliver 89 dwellings, including 40% affordable housing, equipped children's play area, outdoor mini-gym and two all-weather tennis courts with associated floodlighting. Discussions regarding the principle of development and design proposals at the site have been ongoing between Bellway and officers. On behalf of Bellway Homes, this representation is made in support of the site being allocated for residential development. The site is considered as a potential location for housing within Policy Document N6 'Raynes Park', as Site RP6</p>	Noted. One correction The site is not expressly identified potential location for housing within Policy Document N6 'Raynes Park', as Site RP6. The draft allocation RP.6 states <i>Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. It does not include an indicative site capacity for new homes, unlike other sites in the draft plan that are expressly proposed for new homes.</i>
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Structure of this Representation</p> <p>This representation provides a brief overview of the site, details of the current full planning application at the site being considered by LBM, and current and emerging policy designation. Throughout this response, we set out why the site is suitable for inclusion in the New Local Plan as an allocated housing site. The site is approximately 2.8 hectares in size. It is owned freehold by Bellway Homes. It is located south of Meadowview Road off Grand Drive on the western side in Raynes Park. It currently comprises a fenced off field accessible from Meadowview Road. The original larger site was previously owned by London Electricity used as a private sports facility for members of London Electricity's sports and social club. Due to a declining membership, the facility was closed in September 2000. The unoccupied site is currently secured to protect health and safety and prevent it from falling into disrepair. The northern half of the LESSA site was developed for 44 homes along Meadowview Road, along with the provision of five tennis courts and a clubhouse for Raynes Park Residents' Lawn Tennis Club, completed in 2013. The remaining half of the site is bounded on all four sides by residential development. The surrounding properties are predominantly two and three storeys in height. These include semi-detached houses along Meadowview Road and Blenheim Road/Blenheim Close (to the north), Westway (to the west), Greenway (to the south) and Orchard Close/Elm Grove (to the east). The site is sustainably located and is considered very suitable for residential development. The site has a PTAL rating of 1b and is in very close proximity of PTAL 3 where Meadowview Road meets Grand Drive</p>	no change requested.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Existing Planning Policy Designations</p> <p>The site currently has two policy designations under LBM's adopted development plan. Core Planning Strategy Policy CS13: Open Space, Nature Conservation, Leisure and Culture and Policy DMO1: Open Space. Whilst Policy CS13 looks at protecting and enhancing public and private open space, it also seeks to safeguard viable leisure, recreational and sporting facilities. The policy is supportive of proposals for new and improved facilities. Policy DMO1 also looks at protecting, enhancing and improving access to open space. Residential Development which would enable viable leisure and sporting facilities at the site would not be contrary to these policies. It is requested that the site is released from its current designations and allocated for residential development for the reasons set out in this representation.</p>	<p>No change proposed. This site is currently designated as Open Space on the Policies Map.</p> <p>This response requests that the Site Allocation RP6 is released from its open space policy map designation. The Site Allocation is clear that sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. The open space designation is linked to the former use of the site as a Playing Pitch and the site is identified in the Merton Playing Pitch Strategy 2019.</p> <p>The proposed removal of the Open Space designation is not supported by officers for the following reasons:</p> <ul style="list-style-type: none"> - The site is identified in the Playing Pitch Strategy with interest shown by a number of sporting bodies. The landowner will need to demonstrate that the entire site cannot be delivered for sporting or community uses before any other uses can be considered. - The site has been reviewed by officers and it is considered that it continues to meet the Open Space criteria. - The applicant has not provided any evidence to indicate that the site no longer meets the Open Space criteria.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Current Full Planning Application at the Site (LPA Ref. 20/P3237)</p> <p>A full planning application was submitted by Bellway for the redevelopment of the site and it was validated on 16 November 2020. The current application seek approval of the following: Redevelopment of part of former Lessa sports ground involving the erection of 89 dwellings, including affordable housing, associated landscaping, equipped children's play area and associated infrastructure, including flood mitigation, vehicular access and parking, plus the erection of 2 all-weather tennis courts with floodlighting, storage compound and parking.</p> <p>The application was submitted following formal pre-application discussions with LBM officers and several public consultations with residents and local stakeholders. Statutory and non-statutory consultees have provided comments on the live application. Bellway and its team are considering their comments and is looking at making positive amendments to the scheme in response to feedback received. Working with officers, the scheme will evolve further through the planning process to deliver the optimum development whilst considering all pertinent site considerations.</p> <p>Discussions have been ongoing between Bellway and LBM, with flood and design officers providing comments. In response, Bellway and their consultants have reviewed the proposed masterplan and provided an updated set of drawings. Urban Design officers at LBM recognise the site's potential to deliver housing at a sustainable and existing residential location. Therefore, Urban Design officers have been promoting Bellway to increase the density of development at the site to maximise the potential to deliver housing. The amended optimised layout is to also consider flooding and drainage matters as well as provide open spaces and on-site sporting facilities in the form of an equipped play area, two tennis courts, a multi-use games area (MUGA), outdoor gym, trim trail and communal green-space. The most recently published draft New Local Plan documents currently being consulted on by LBM demonstrate a direction of travel that the site should be allocated for housing. LBM is to deliver a 'minimum of 11,732 additional homes for the period 2021/22 – 2035/36' (draft Policy H4.2). LBM state in the New Local Plan that it will achieve this housing delivery by supporting the delivery of well-designed new homes on sites which optimise levels of residential density in accordance with the design-led approach set out in the London Plan and Merton's design code guidance. Therefore, to support housing delivery required by the New Local Plan, the focus going forward should look at the delivery of the most appropriate housing scheme at the site. The live planning application provides an excellent opportunity for Bellway to work with LBM officers to deliver the optimum housing scheme at the site</p>	Specific change requested is covered in other representations by the same representor.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Consultation Policy Document N6 'Raynes Park' Site Allocation: Site RP6 'Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB'</p> <p>Bellway strongly supports the site to be allocated for housing in Merton's the new Local Plan.</p> <p>However, Bellway objects to the current proposed allocation wording and requests amendments to the draft allocation wording to allocate the site for housing and support housing delivery at the site. Future Merton has published a series of Stage 3 Local Plan documents for consultation, including neighbourhood document N6 'Raynes Park' which includes an overall future vision for Raynes Park to be delivered and supported by the New Local Plan and site specific allocations within the Raynes Park area. The site is identified as Site Allocation RP6: Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB.</p> <p>In the supporting text it states:</p> <p>Site allocation: <i>Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered.</i></p> <p>Design and accessibility guidance: <i>Development of the site may provide opportunities for entire site sports use.....</i></p> <p><i>Development proposals for sports use or other uses compatible with the designated open space should be actively demonstrated prior to any alternatives being taken forward.....</i></p> <p><i>Development proposals should protect the amenity of surrounding residents.</i></p> <p>Infrastructure Requirements:.....</p> <p><i>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</i></p> <p><i>This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan</i></p>	noted

7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Ensuring the New Local Plan Allocation of the site is 'Sound'</p> <p>The NPPF requires Local Plans to be found 'sound' in order to be recommended that the Plan can be adopted (paragraph 35). Of importance, the use of the entire site for a sporting or community use is not supported by the landowner. The evidence provided in this representation below sets out how the site is not deliverable as a sporting or community use. Therefore, the wording of the site's allocation should be amended to remove the requirement to demonstrate that a 'Sporting or community use of the entire site will have to be proven as undeliverable'.</p> <p>It is demonstrated below that the site is not deliverable as a community or sporting use. Therefore, the New Local Plan would not meet the test of 'soundness' if the LESSA site is allocated with the current proposed allocation wording. This is because the site is not available, deliverable or developable as a sporting or community use. Therefore, amendments are required to the proposed allocation of the site in the New Local Plan to allocate the site for residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land.</p> <p>Below sets out how the site is not deliverable as a sporting or community use, responding to the wording for the site in the current draft allocation.</p>	<p>No change proposed. This response requests that the Site Allocation RP6 is allocated for residential with some sporting / leisure uses. The council's Site Allocation is clear that sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. The site is a former Playing Pitch and is identified in the Merton Playing Pitch Strategy 2019; the site is also designated open space.</p> <p>The proposed allocation for residential with some sporting leisure is not supported for the following reasons:</p> <ul style="list-style-type: none"> - The site is identified in the Playing Pitch Strategy with interest shown by a number of sporting bodies and an objection from Sport England. Other representations on the site cite the interest from sporting organisations who wish to deliver the whole site for sports uses. The landowner will need to demonstrate that the entire site cannot be delivered for sporting or community uses before any other uses can be considered. The landowner not wanting to develop the former playing field for sporting uses is not the only rationale. - The applicant has not provided any evidence to indicate that the site no longer meets the Open Space criteria.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Demonstrating that the use of the entire site for sporting or community use is not deliverable</p> <p>Site Allocation RP6 sets out that the council's proposed approach to allocating the site for residential development should be done once it is demonstrated that a sporting or community use of the entire site is undeliverable. This does not accord with relevant evidence base to prepare the Local Plan which is the Matron Playing Pitch Strategy (the PPS) (see below) where the PPS required that 'part or all of the site' to not be viably delivered for a sporting use by a 'club or community group'. The extensive assessments and investigations undertaken by LBM and Bellway, which have included a 12- month marketing exercise (Sept 2019 – Sept 2020), direct consultations with local sports clubs and organisations, national governing bodies of sport and with Sport England, have demonstrated that the use of the entire site for a sporting or community use is not deliverable. This justification was set out in detail in the Sports Needs and Viability Report of October 2020, which was submitted with the planning application (reference number 20/P3237), a copy of which is provided as Appendix 1 [please see original response to view appendix 1]. Subsequent to Sports Needs and Viability Report, there have been further discussions with LBM officers on sports needs and viability, summarised below.</p>	Noted
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Merton's Adopted Playing Pitch Strategy</p> <p>The Merton Playing Pitch Strategy (PPS) was formally adopted by the LBM Cabinet with effect from 14 October 2019 following a resolution by LBM Cabinet to approve and adopt the Strategy. The PPS is the lead policy document that identifies the sports needs across the Borough, and as such informs the opportunities for sport on the site. Given its formal adoption, the PPS policy takes precedence over that of the current stage of the emerging Local Plan. Prior to its adoption, the PPS was agreed by the steering group comprising LBM, Sport England and the National Governing Bodies of Sport (NGBs) including the Football Association (FA), England & Wales Cricket Board (ECB) and the Rugby Football Union (RFU). In respect of Merton's new Local Plan, and in the context set for the LESSA site, the PPS states: <i>This PPS indicates that these sites ... [including Site Allocation RP6] ... should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough.</i> Merton Playing Pitch Strategy paragraph 5.2.2</p>	no change requested.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>The PPS policy sets out that:</p> <ul style="list-style-type: none"> ↳ The LESSA site should be subject to an investigation of six months from the date of its adoption, to test if there was a viable and deliverable community or club sports need for the whole or part of the site. That period ended in 14 April 2020. ↳ The use of the site was to be for a 'club or community use'. It was not intended for commercial leisure use such as 5-a-side football cages, adventure golf, or a private school's sports ground. ↳ The land use to be considered was for 'sporting use', e.g. by a sports club or a community group wanting a sports site. The PPS therefore excluded general community use, e.g. a community centre without a dominant sporting use. ↳ That the 'thorough investigation' by the steering group implies direct action to investigate the potential site use for sport by LBM and the national governing bodies of sport in addition to action by the landowner. 	<p>The council does not agree with this representor that the statement in Merton's Playing Pitch Strategy excludes commercial / private sports facilities, private school sports ground or any similar commercial sports enterprises from providing sports uses on this LESSA site. The statement referred to in Recommendation G1 is <i>This PPS indicates that these sites [including LESSA] should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use...</i>. The Playing Pitch Strategy paragraph 2.3.7 states <i>Private clubs in the area owned 30% of other outdoor facilities and pitches whilst the education sector and commercial providers formed the remaining 13%</i>. and the PPS refers to many different types of clubs, including professional football clubs, the All England Lawn Tennis Club, various private and community sports clubs. There is no statement in the PPS that excludes private / commercial providers from providing sporting uses. The representor has been informed of this.</p> <p>As part of the investigation started by the council, Sport England and the NGBs for sports, two NGBs visited the site in February 2020. Unfortunately the start of the global pandemic in March 2020 derailed the completion of any further investigation work or site visits. Pre application discussions between the applicant and the council's development management department started mid 2020, the representor states that they undertook marketing of the site for sporting uses between mid July and mid September 2020 and the landowner submitted a planning application in November 2020.</p>
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Testing the Site for Sporting Use by a Club or for Community Use</p> <p>There have been a large number of stages in the testing of the PPS policy, and these are summarised in the site chronology table in Appendix 2 to this letter. The following provides an overview. In response to the PPS requirements, Bellway undertook a 12 month marketing and consultation exercise between September 2019 and September 2020, led by Haslams with support from specialist sports consultancy Nortoft. The details are provided in the application's Sports Needs and Viability Report, October 2020 (Appendix 1).</p> <p>This consultation and marketing exercise considered various relevant sports uses compatible with the current designation of the site and appropriate to its context, including hockey, rugby, tennis, football and cricket. No viable and deliverable sports uses which met the policy tests of the PPS for the whole site came forwards, or were otherwise identified in, the period up to 16 September 2020.</p> <p>[Officer's comments - Appendix 1 and appendix 2 are available in the original response</p>	<p>Some of the matters referred to in this representation have been submitted with and considered by the planning application process, between the applicant and the council and other stakeholders such as Sport England and local community groups. As part of the Local Plan officers can only comment on matters submitted to and relating to the Local Plan, not matters that have been submitted and are being considered as part of a live planning application. It should be noted that Sport England and the London Borough of Merton's planning department (development management who were dealing with the planning application) were contacted by organisations who stated they could deliver whole site sports on this site and stated they either had not been aware or had responded to the landowner but not heard back. Sport England and other representors have objected to the loss of this site as a playing field.</p>

7	Bellway Homes Limited	06 Raynes Park	RP6	<p>At the specific request of LBM, the site was also required to be more widely marketed to potential commercial sports interests, such as golf driving range and 5-a-side football 'cage' companies, some additional local sports clubs, and other 'late' expressions of interest e.g. private schools. This wider marketing and investigation took place between 16 July 2020 and 16 September 2020. Again, Haslams assessed the proposals received and concluded that no proposal had been submitted which met the tests of the PPS for the whole site. Furthermore, no comprehensive proposals have been presented to Bellway or their representatives since September 2020. The Raynes Park Residents Lawn Tennis Club (RPRLTC) were however seeking additional court space due to local high demand. As the site could offer space adjacent to the tennis club's existing site this was supported by the Lawn Tennis Association. Therefore, Bellway made a formal offer to RPRLTC, which was formally accepted, to provide two new tennis courts, along with ancillary tennis provision. The details of the tennis courts, ancillary car parking and other ancillary tennis court provision was set out in the detailed planning application submitted by Bellway in November 2020 at the site (App Ref: 20/P3237) and its delivery can be secured as part of a Section 106 Agreement or via condition as part of the submitted residential development. This proposed tennis use at the site meets the PPS test of part of the site being retained for a club or community sport.</p> <p>In January 2021, Sport England supported the current live planning application at the site with the proposals for on-site tennis provision and significant off-site financial contributions to PPS priority sites close by, the off-site financial contributions to be secured via a S106 Agreement. This reflected the discussions about the site which took place as an item at the annual PPS review meeting comprising the NGBs, Sport England and LBM. However, in February 2021, following receipt of a letter from the Raynes Park Residents Association who were lobbying against the planning application, Sport England further consulted the NGBs and decided to reverse its previous position and object to the application. In August 2021, LBM decided to re-consult specific sports and other organisations on their demand for the site. The deadline for responding is 2 September 2021. The results of this consultation have not yet been shared with Bellway. In summary, to date there have been no evidenced proposals from any club or community group for the purchase and viable delivery of all of the site for sporting use at any time, i.e. none that meet the adopted PPS policy tests.</p> <p>The proposed RP6 Site Allocation as worded below is therefore not justified: sporting or community use for the entire site will have to be proven as undeliverable before any other uses can be considered.</p> <p>Reasons include that:</p> <ul style="list-style-type: none"> ⊘ no clearly viable and deliverable sports use for clubs or the community has been proven for the whole site; ⊘ the PPS test included sport use on 'part of the site' and this can be met through providing for the clear demand and viably deliverable tennis provision; ⊘ any test needs to be considered in the planning balance and assess the overall benefit to sport and active recreation, both on-site and off-site 	<p>Some of the matters referred to in this representation have been submitted with and considered by the planning application process, between the applicant and the council and other stakeholders such as Sport England and local community groups. As part of the Local Plan officers can only comment on matters submitted to and relating to the Local Plan, not matters that have been submitted and are being considered as part of a live planning application. It should be noted that Sport England and the London Borough of Merton's planning department (development management who were dealing with the planning application) were contacted by organisations who stated they could deliver whole site sports on this site and stated they either had not been aware or had responded to the landowner but not heard back. Sport England and other representors have objected to the loss of this site as a playing field.</p>
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>The current proposed allocation of the site in the draft New Local Plan would not meet the test of 'soundness' required by the NPPF. A change to the Site Allocation wording is required to meet the test of soundness and to enable delivery of residential development and on-site tennis provision, a small multi-use games area (MUGA) to meet older children/youth needs, an outdoor gym, trim trail, walking/jogging routes to meet wider community health needs, plus public open space with children's play, which both meet an identified need at this location. It is requested that the site allocation wording is amended accordingly.</p>	<p>No change proposed. This response requests that the Site Allocation RP6 is allocated for residential with some sporting / leisure uses. The council's Site Allocation is clear that sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. The site is a former Playing Pitch and is identified in the Merton Playing Pitch Strategy 2019; the site is also designated open space.</p> <p>The NPPF 2021 tests of soundness are:</p> <ul style="list-style-type: none"> a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. <p>The proposed allocation for residential with some sporting leisure is not supported for the following reasons:</p> <ul style="list-style-type: none"> - The site is identified in the Playing Pitch Strategy with interest shown by a number of sporting bodies and an objection from Sport England. Other representations on the site cite the interest from sporting organisations who wish to deliver the whole site for sports uses. The landowner will need to demonstrate that the entire site cannot be delivered for sporting or community uses before any other uses can be considered. The landowner not wanting to develop the former playing field for sporting uses is not the only rationale for it being undeliverable. At this time, the proposed new allocation would be contrary to para 99 of the NPPF 2021 - The applicant has not provided any evidence to indicate that at this time the site no longer meets the Open Space criteria.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Other Uses of the Site to Support Off-Site Sports Provision</p> <p>On 24 September 2020, Sport England confirmed that the NGBs, other than for tennis, would prefer any S106 contributions generated by residential use at LESSA to be directed towards existing off-site sports facility priorities in the local area, as identified in the PPS Action Plan. These investment needs include the provision of 3G artificial grass pitches for football, which can be managed to provide for up to 60 hours use a week. Offsite S106 investment would enable the provision of new facilities and the improvement of existing facilities, enabling them to respond effectively to greater demand from a growing population in Merton for a range of sports' needs and as well as supporting their continued viable operations. The potential benefit of such off-site investment plus the proposed all-weather tennis courts would meet other LBM objectives for health and wellbeing as a large number of people from all backgrounds could be supported to be active. In addition, the proposed public open space with trim trail, walking/jogging routes and MUGA have the potential to be used by everyone living locally. These wider and multiple benefits that can be delivered through housing at the site which would generate significant financial S106 contributions for off-site sporting uses should be compared to the very limited potential that bringing the whole but constrained site back into sport use can offer. Whether the site is used for pitch sport of football, cricket or rugby, a large majority of players, and therefore users of the site, are male and under the age of 45. The dimensions of the site will limit its use to a single adult pitch or equivalent. If providing for football or rugby on grass, this might have 2-3 hours use a week during the winter months for a maximum of around 100 players. If providing for cricket, this use is likely to be limited to April-September at best and the ECB has already stated that the site is constrained due to its size and surrounding residential properties. It has been demonstrated the site is not deliverable in its entirety as a viable and deliverable sporting use. This further analysis demonstrates the site is not suitable for many sporting uses and would provide limited benefits to a small number of people if it was to be entirely used for sporting use. The part-use of the site for tennis along with housing that can provide significant financial contributions for off-site sporting use would provide many more benefits to a greater number of people and sports.</p>	<p>Noted. No change requested.</p>
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Statutory Consultation and Other Referral for Sport</p> <p>With regard to planning applications at this site and the draft allocation of the site, Bellway re-iterate the following:</p> <p>Sport England Sport England is not a statutory consultee for planning applications at the site as (i) the site has not been used as a playing field for more than 5 years, and (ii) the Site Allocation is not specifically for a playing field. Sport England has agreed this status.</p> <p>Mayor of London Planning applications at the site do not require referral to the Mayor of London because it the site has not been used as a playing field within the last 5 years. Sport England also agrees with this.</p> <p>Planning applications at the site are to be determined by LBM. The planning decision is therefore a matter for LBM to be taken in the planning balance.</p>	<p>Noted</p>

7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Site Allocation: Residential Use</p> <p>The site is sustainably located surrounded entirely by residential development. The most suitable alternative use of the site would be for residential redevelopment with some on site sports facilities plus new public open space and play provision, which directly respond to the Infrastructure Requirements set out in the supporting text of Site Allocation RP6. Also given that a sporting or community use of the entire site is undeliverable, another use of the site is to be considered. Even if some, constrained, sporting use was eventually found to be potentially viable for the whole site, then this would not be a better use of the site, given the proposed significant benefits to community sport and recreation from the partial development of the site for housing, along with onsite sports, recreation and public open space provision, together with significant off-site S106 financial sports contributions that meet identified local priority needs. The value of the CIL compliant sporting and recreation investment being proposed by Bellway includes about £367,000 for two new on-site tennis courts, ancillary tennis uses and improvements to the existing tennis courts, and about £640,000 for off-site contributions to playing pitch sports priorities in the local area as identified in the PPS. These clear deliverable benefits far outweigh any whole on-site sports-only provision that have not been proven as viable or deliverable, and are on land that is not available for such a purpose. The current live planning application at the site has demonstrated an acceptable scheme of 89 dwellings, along with some viable on-site sporting provision. Whilst the scheme subject to the live application is being further refined in light of consultee comments, with the potential to increase density as guided by comments of Merton's Urban Design Officer to support further housing at this sustainable location, the current planning application provides a comprehensive response demonstrating how redevelopment of the site could come forward whilst protecting the amenity of surrounding residents and meeting the adopted Local Plan and PPS policy tests.</p>	Noted
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Policy H4.2 of the Stage 3 Consultation sets out that Merton is to deliver 11,732 new homes over the period 2021/22 – 2035/36. As a constrained borough, new homes should be delivered in the most sustainable locations close to existing services and infrastructure. The allocation of the site for residential development would provide the Local Plan with certainty on the delivery of housing from an allocated site. The site would also provide a much needed contribution to Merton's housing land supply. Therefore, it is requested that the site's allocation in the site reference RP6 in LBM's New Local Plan allocates the site for the following: Site Allocation: Residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land, comprising: 2 tennis courts with ancillary facilities including dedicated parking, a small multi-use games area (MUGA), an outdoor gym, a trim trail, walking/jogging routes; together with publicly accessible open space including a new children's play area and landscaping.</p>	Noted. No change proposed. The LESSA site is not included in the council's 5 year land supply, which it is meeting. The site could make a contribution to new homes in Merton subject to demonstrating that it cannot be delivered for sporting or community uses. The council is not dependent on the LESSA site to provide new homes.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Addressing Drainage and Flood Risk</p> <p>The supporting text to Site Allocation RP6 sets out that drainage on the site will have to be improved for any proposals to address the likelihood of fluvial flooding and critical drainage. The south west corner of the site is located within Flood Zone 3. However, a comprehensive re-profiling of the site is proposed, ensuring all residential accommodation finished floor levels for living and sleeping accommodation will be set above the 100 year plus 35% climate change flood level plus a 300mm freeboard.</p> <p>Further, as part of the site's re-profiling of levels, a flood compensation area within the west and southern areas of the site will provide additional flood water storage capacity. This will provide protection to the site whilst offering significant betterment to the surrounding areas. Additional storage on site has also been provided for the 1 in 20 year flood event which will increase the available functional floodplain and provide betterment elsewhere. In support of the current planning application, a Flood Risk Assessment and Drainage Strategy (FRADS) has been prepared. The FRADS has demonstrated that the proposals would not be at risk of flooding or increase the flood risk to others as a result of the proposed development. There have been ongoing discussions with the LBM Flood Officer who is generally supportive of the flooding mitigation approach. Notwithstanding, Bellway's drainage consultant working with the appointed architect has reviewed the masterplan against the required floodplain compensation requirements and made further amendments and improvements. In addition, Bellway has prepared a Sequential Test to demonstrate that development of part of the site located within flood zone 3a is sequentially preferable to development at other sites in the borough. This will be submitted to LBM with the submission of Bellway's amended scheme. Therefore, it is considered the proposed development is acceptable in flooding and drainage terms.</p>	Noted. No change requested. Officers can only comment on matters relating to the Local Plan, not a live planning application.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Site Deliverability</p> <p>The site is <u>not</u> suitable, available, deliverable or developable for <u>sporting use</u>. The site <u>is</u> suitable, available, and deliverable for <u>housing</u>.</p> <p>The Site Allocation RP6 in the Stage 3 Local Plan Consultation correctly identifies that the site is within one land owner, Bellway Homes. Bellway's current ownership of the land puts them in the position to deliver housing in the first five years of the Local Plan period starting 2021/22. Following the grant of detailed planning permission, Bellway Homes intend to construct the development in a prompt manner, beginning construction and delivering housing at the site within 5 years.</p>	Noted.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Design Guidance</p> <p>The supporting text of Site Allocation RP6 states that development proposals should protect the amenity of surrounding residents. It is considered that the redevelopment of the site for residential uses would be a wholly compatible and acceptable land use with the surrounding site context. Subject to careful design, it would not result in inappropriate or unacceptable impacts upon the existing residential amenity of surrounding properties.</p>	Noted. No change requested.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Strategic Policy H4.2 'Housing Provision' and Housing Need and Delivery</p> <p>Following the previous Stage 2 Regulation 18 Consultation, the number of homes to be delivered in the Borough of Merton has increased very significantly. The number of additional homes to deliver for the period of 2021/22 to 2035/36 has increased from 6,165 to 9,180, an increase of 3,015. In order to meet the increase in housing numbers the Borough is to supply, this site with draft Allocation RP6 would provide a welcome and meaningful contribution to Merton's housing land supply.</p> <p>Importantly, within the London Plan (2021) the housing need for London has been increased to 52,287 new homes each year. For the London Borough of Merton, the ten year housing target has been increased to 9,180 dwellings, which equates to an annual target of 918 dwellings. Again, it is reiterated that draft Allocation RP6 would make a meaningful contribution of 130 new homes towards meeting Merton's housing targets and allow the site to make a valuable contribution to the housing land supply. It would ensure that Local Plan policies take priority and allow development in Merton to remain plan-led.</p>	Noted. No change requested.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Affordable Housing Delivery</p> <p>The current planning application submitted at the site seeks to provide 40% affordable housing. The delivery of affordable housing is a further significant planning benefit that would result from the allocation of the site for residential development.</p>	Noted. No change requested. Officers can only comment on matters relating to the Local Plan, not a live planning application.
7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Other allocations</p> <p>LBM draft New Local Plan Site Allocation Mi14 United Westminster Schools site, Tamworth Lane, is proposed to be allocated for the creation of new publicly accessible sporting facilities enabled by residential development. The allocation notes that the existing use of the site is a vacant former playing field and has a site area of 5.14ha. The former use of the site is comparable to the LESSA site. However, the Tamworth Lane site has the potential to provide significantly more space for sporting and community uses. In addition, the supporting text to the allocation notes that the consultee has provided evidence of the operation of this site for community uses via hire to local sports clubs for several years. Therefore, it appears that the Tamworth Lane site allocation is more preferable for the development of sport and community uses than the LESSA site. However, the testing undertaken in relation to the LESSA site, although different, is at least as robust as that undertaken for Tamworth Lane.</p>	Noted. It is considered that the proposed site allocation Mi14 Tamworth Lane, referred to in this comment, has demonstrated its unviability for community sports use on this site by presenting records of previous accounts for renting the site for community sports use. This evidence has not been presented for Site RP.6 LESSA.

7	Bellway Homes Limited	06 Raynes Park	RP6	<p>Summary and Conclusions</p> <p>The site at land to the south of Meadowview Road, the former LESSA Sports Ground Site, is vacant. It has been demonstrated the site is not deliverable in its entirety as a viable and deliverable sporting use. Therefore, the site should be allocated for another use in the New Local Plan to ensure the Plan is found 'sound'. The LBM draft New Local Plan currently proposed the former LESSA Sport Ground site is allocated with the following, 'Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered'. As set out in this representation, the site is not deliverable in its entirety as a sporting or community use. Therefore, it is requested that the proposed allocation is amended. An amendment to the proposed allocation is also required to ensure the Plan is found sound. A residential use of the site is considered the most appropriate alternative land use of the site. It is therefore requested that the site is allocated for residential use together with the provision of new tennis courts, a MUGA and new public open space including children's play provision. Significantly, the redevelopment of the site for housing could provide S106 contributions for off-site investment into other priority playing field sites in line with the Action Plan of the adopted Merton Playing Pitch Strategy. This would enable new sports opportunities to be offered to a large number of people from many different sectors of the community, supporting health and wellbeing priorities. The site is strongly supported for inclusion as a housing site in the Merton Local Plan. The site is suitable, available and deliverable for housing. The site can deliver new homes in the first 5 years of the Local Plan period. Therefore, it is requested that the draft Local Plan Site Allocation for RP6 (Former LESSA Sport Ground) is amended to: Site Allocation: <u>Residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land, comprising: 2 tennis courts with ancillary facilities including dedicated parking, a small multi-use games area (MUGA), an outdoor gym, a trim trail, walking/jogging routes, together with publicly accessible open space including a new children's play area and landscaping.</u></p> <p>We would be grateful for confirmation of these representations. Please feel free to contact myself or Gregory Evans (contact details provided) of these offices in the first instance if you have any queries or would like to discuss. [two appendices included - please see original response]</p>	<p>No change proposed. This response requests that the Site Allocation RP6 is allocated for residential with some sporting / leisure uses. The council's Site Allocation is clear that sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. The site is a former Playing Pitch and is identified in the Merton Playing Pitch Strategy 2019; the site is also designated open space.</p> <p>The NPPF 2021 tests of soundness are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p> <p>The proposed allocation for residential with some sporting leisure is not supported for the following reasons:</p> <ul style="list-style-type: none"> - The site is identified in the Playing Pitch Strategy with interest shown by a number of sporting bodies and an objection from Sport England. Other representations on the site cite the interest from sporting organisations who wish to deliver the whole site for sports uses. The landowner will need to demonstrate that the entire site cannot be delivered for sporting or community uses before any other uses can be considered. The landowner not wanting to develop the former playing field for sporting uses is not the only rationale for it being undeliverable. <p>At this time, the proposed new allocation would be contrary to para 99 of the NPPF 2021</p> <ul style="list-style-type: none"> - The applicant has not provided any evidence to indicate that at this time the site no longer meets the Open Space criteria.
7	Bellway Homes Limited	Policies Map		<p>Existing Planning Policy Designations</p> <p>The site currently has two policy designations under LBM's adopted development plan. Core Planning Strategy Policy CS13: Open Space, Nature Conservation, Leisure and Culture and Policy DMO1: Open Space. Whilst Policy CS13 looks at protecting and enhancing public and private open space, it also seeks to safeguard viable leisure, recreational and sporting facilities. The policy is supportive of proposals for new and improved facilities. Policy DMO1 also looks at protecting, enhancing and improving access to open space. Residential Development which would enable viable leisure and sporting facilities at the site would not be contrary to these policies.</p> <p>It is requested that the site is released from its current designations and allocated for residential development for the reasons set out in this representation.</p>	<p>This site is currently designated as Open Space on the Policies Map.</p> <p>This response requests that the Site Allocation RP6 is released from its open space policy map designation. The Site Allocation is clear that sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. The open space designation is linked to the former use of the site as a Playing Pitch and the site is identified in the Merton Playing Pitch Strategy 2019.</p> <p>The proposed removal of the Open Space designation is not supported by officers for the following reasons:</p> <ul style="list-style-type: none"> - The site is identified in the Playing Pitch Strategy with interest shown by a number of sporting bodies. The landowner will need to demonstrate that the entire site cannot be delivered for sporting or community uses before any other uses can be considered. - The site has been reviewed by officers and it is considered that it continues to meet the Open Space criteria. - The applicant has not provided any evidence to indicate that the site no longer meets the Open Space criteria. <p>No further action required.</p>
8	Belvedere Estates Residents Association (BERA)	N/A		<p>The Belvedere Estates Residents' Association ("BERA") comprises 26 roads south of the AELTC site and Wimbledon Park Golf Club, including Church Road, St Mary's Road, the High Street and several others in close proximity. BERA's membership is predominately in the Wimbledon North and Wimbledon Village Conservation Areas.</p>	Noted
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3	<p>BERA objects to the proposed inclusion of in Site Allocation Wi3 (Ch 9 p282 –285) of the AELTC's land on the eastern side of Church Road, currently the Wimbledon Park Golf Club.</p>	Noted. Specific responses are made to the other comments below.
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3	<p>The AELTC Land -its Location and Heritage</p> <p>Wimbledon Park and AELTC's Wimbledon Park Golf Club land are in the Wimbledon North Conservation area, as are the majority of BERA's membership roads. The AELTC's land east of Church Road is currently designated as Metropolitan Open Land ("MOL")(the urban equivalent of Green Belt), a Grade II* Listed Heritage Asset, a Site of Importance for Nature Conservation and on Historic England's "Heritage at Risk" register. National, Local and indeed Merton's own planning policy framework are intended to protect sites of this nature from development. The Draft Local Plan acknowledges the importance of protection with the ambition in Ch 9.1 to "Conserving and enhancing the quality of neighbourhoods within the neighbourhoods through Conservation Area character protection...".</p>	Additional modification to clarify that Wimbledon North Conservation area covers the Wimbledon Park part of the site and lies to the south of the site
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3	<p>The Site Location summary "impact on a conservation area" (Ch 9 p284) is incorrect stating that "Wimbledon North Conservation Area lies to the west of the site." Other than the northern triangle of land that is in Wandsworth, the entire Wimbledon Park Golf Club lies within the Wimbledon North Conservation Area. This is therefore inclusion for proposed development not of land next to a Conservation Area but inside a Conservation Area. The Draft Local Plan states Ch 1B p11 "Our heritage assets and historic environment are irreplaceable and an essential part of what makes Merton a vibrant borough and their effective management is fundamental" and p12 "The Mayor will be developing a London wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage... Merton Council supports this approach and will work with local communities, the Mayor and partners to protect and enhance our rich heritage". A Grade II* listed site designed by Capability Brown on Historic England's "Heritage at Risk" register, clearly is one of Merton's "heritage assets" and should be protected.</p>	Agreed. The text on page 284 has been updated to correctly reflect the Conservation Area status in accordance with the Policy Maps.
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3	<p>Development of the AELTC Land East of Church Road</p> <p>The Draft Plan combines the AELTC's landholdings of both the east and west sides of Church Road into the single Site Allocation Wi3. (However, the Draft Plan shows two different maps for Wi3 –on page 276 only the AELTC's existing developed site west of Church Road is included whereas on p282, the full site and accompanying text refer to the larger site on both sides of Church Road.)</p>	Agreed. An additional modification has been proposed to ensure that the summary map of all of Wimbledon's sites (on page 276) reflects the map in the site allocation wi3
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3	<p>The two parcels of AELTC land either side of Church Road are entirely different. The existing site west of Church Road including the Somerset Road site has been developed over the past 100 years, with additional buildings still under construction and outstanding planning permissions yet to be implemented. The new site east of Church Road, as described previously, is protected Heritage MOL/ Green Belt land. The Draft Plan Ch 9.1q supports "the continued upgrade and improvement of the AELTC's facilities either side of Church Road...". In our view, this is an unacceptable and misleading statement as it does not recognise the distinct characteristics of the two parcels of land, with the land on the east side having no facilities to upgrade nor improve as the AELTC only recently acquired use of the land which is currently in use as a golf course. How can a parcel of land which is half fully developed and half fully protected be combined in a Local Plan and designated as further developable simply because it has the same ownership?</p>	The whole of the land owned by AELTC has been identified as part of a world class sporting venue of national and international significance. The Site Allocation sets out all of the relevant Policy Map designations for the site. No changes proposed.
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3	<p>Ch 9 p283 states "The AELTC have commenced the preparation of an updated masterplan to investigate and identify the future development opportunities of the AELTC estate and The Championships incorporating the golf course". To our knowledge, this document is not in the public domain. Is it the same as the recent extensive 100+ document planning application (21/P2900)? Regardless, the commercial and development opportunities for a private company should not be openly endorsed in a Local Plan. A decision on the inclusion of the AELTC's Golf Club land east of Church Road in Site Allocation Wi3 should be made on the rationale (or lack thereof) for its inclusion. A decision whether or not to grant planning permission for the site should be judged relative to the planning framework for this specific parcel of Heritage and Metropolitan Open Land.</p>	An Additional modification proposed to clarify that AELTC prepared a new masterplan and submitted application reference 21/P2900 in 2021. AELTC's new masterplan is available on their website https://www.wimbledon.com/en_GB/about_wimbledon/estate_master_plan.html and AELTC carried out public consultation in 2021 prior to submitting their application. The Local Plan states that AELTC did this. It is not endorsing or rejecting their proposals.

8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3		<p>Covenant Against Development and Merton's Conflict of Interest as Trustee of the Park</p> <p>The AELTC bought the freehold of Wimbledon Park Golf Club from Merton in 1993. Given the community's concerns about AELTC's future development plans, both the Chairman of the AELTC and the Leader of Merton Council made statements and assurances that the land would not be built upon. To support this commitment and add to the Metropolitan Open Land site's protections, the Wimbledon North Conservation Area was expanded to include the Golf Course. Additionally, in the Transfer Deed relating to the purchase, the AELTC covenanted to restrict future development. This covenant is for the benefit of the remainder of Park land which is still owned by Merton. Specifically any "building shall not impair the appreciation of the general public of the extent or openness of the property". This covenant is consistent with NPPF policy 137 "the fundamental aim of Green Belt policy is ... keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" and policy 149 "a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt". The inclusion of the AELTC land east of Church Road / Golf Club in Site Allocation Wi3 as an area for development clearly is inconsistent with this covenant and NPPF policies. The AELTC's recent planning application with 38 courts, ancillary buildings and an 8000 seat stadium of approximately 30m high, demonstrates the scale of development anticipated and will significantly affect the "openness" of the property which is currently in use as a golf course. As Trustee of the Park (for the benefit of the public), which benefits from the covenant, as well as the planning authority ruling on the potential development, Merton may have a conflict of interest.</p>	Restrictive covenants are not a planning matter. The site allocation Wi3 is for "World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake". The NPPF including paragraph 99 supports sports and recreation provision on designated open space.
8	Belvedere Estates Residents Association (BERA)	09 Wimbledon	Wi3		<p>Conclusion</p> <p>Site Allocations are used to identify sites which are ripe for development to ensure redevelopments "integrate well into its surroundings and contributes towards meeting strategic needs for public open space" (Ch 9 p276). Unlike any of the other sites proposed for inclusion, this land is: Metropolitan Open Land/ Green Belt A grade II* listed area at the centre of Capability Brown's work. Within the Wimbledon North Conservation area, and On Historic England's "Heritage at Risk" register. We believe it is wholly inappropriate for this land to be included in this Allocation as it conflicts with Merton, London and National planning policies. The Allocation needs to be justified against recognised policy. Policies applicable to sites which are MOL, Conservation Area and Heritage Assets protect these areas from development as these areas are special, important and deemed worthy of that protection. This land is irreplaceable. The inclusion of this land east of Church Road in Site Allocation Wi3 ignores these protections.</p>	No further change proposed. The site allocation Wi3 is for "world class sporting venue of national and international significance with support for continued and long term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake". The site allocation does not propose to remove the MOL or heritage designations and provides an opportunity to address the fragmented land ownership and management which is identified as a cause for the Grade II* listed Wimbledon Park being on the Heritage at Risk Register
9	CBRE GI	11 Housing			4.13 It is noted that this assessment identifies "Morden town centre regeneration phase 1" as a 5 year net gain of only 80 units between 2020 to 2025. However, we question whether "phase 1" site(s) are actually available, viable and deliverable within the next 5 years.	Phasing is a detailed matter that will be determined as part of a plan-led approach for the delivery of the Morden Regeneration Zone. The surface level Kenley Road Car Park, which is owned by the council, and the adjacent Morden Station Car Park and TfL operational surface parking areas, which are owned by TfL, could be delivered within the first 5-years of the plan as they currently have site allocations for residential use, respectively Sites 65 and 61. However, to ensure the optimal use of these sites as part of a plan-led approach for the delivery of the Morden Regeneration Zone, Major Modification MM5.2 now proposes that the site will be delivered over the 5-10 and 10-15 year periods of the plan
9	CBRE GI	05 Morden	N5.1		<p>6.3 Chapter 5 of the Merton Development Plan is not sound for reasons given in section 5 and to make sound the plan needs to</p> <p>...</p> <ul style="list-style-type: none"> Amend Chapter 5 Morden policy and specifically policy M04 to delete all requirement for comprehensive regeneration only as per Appendix 3. <p>...</p> <p>Proposed modifications in Appendix 3 of the response received for the policy wording:</p> <p><i>This will be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes intensification and comprehensive incremental site by site development within the Morden Regeneration Zone.</i></p> <p>...</p> <p>a. The comprehensive regeneration of the Morden Regeneration Zone (Site Mo4), to optimise the delivery of new homes (including affordable homes), improve the street scene and public realm, make it easier for all to get around, and support businesses and other appropriate uses within the Morden Regeneration Zone. Incremental site by site proposals that contribute to proposals that assist the longer term delivery of comprehensive regeneration as described in this policy and Site Allocation Mo4, will be supported.</p>	<p>The proposed modifications are not necessary to make the Plan Local 'sound' because Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method" and the draft policy does allow for incremental proposals that support the vision and assist with the delivery of comprehensive regeneration.</p> <p>The following proposed modifications are proposed for the relevant sentence: <i>This will be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes include (MM5.1) intensification and comprehensive development regeneration (AM5.7) within the Morden Regeneration Zone (Site Mo1) (AM5.8)</i>"</p>
9	CBRE GI	05 Morden	N5.1		5.3 4) The comprehensive approach is aspirational and so not consistent with National Policy	As clarified in greater detail in the responses above to the same representors, Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method" and the draft policy does allow for incremental proposals that support the vision and assist with the delivery of comprehensive regeneration
9	CBRE GI	05 Morden	Mo4		<p>5.3 It is considered for reasons given below that the Section 5 of the submitted Merton Local Plan – and in particular policies N5.1 and site allocation MO4 – are not sound for the following reasons.</p> <p>1) Not Positively prepared</p> <ul style="list-style-type: none"> Increased London Plan 5 year housing needs - will not be met by comprehensive regeneration of Morden. 	As clarified in the response above, Major Modification MM5.2 now proposes that the site will be delivered over the 10 and 10-15 year periods of the plan. The draft policy does allow incremental proposals that support the vision and assist with the delivery of comprehensive regeneration and Additional Modification AM5.7 seeks to provide further clarification on this matter: "There are also multiple other land ownership interests within the Morden Regeneration Zone and a land assembly strategy will be required to ensure that the site can be developed in a comprehensive manner, to regenerated comprehensively and avoid fragmented development and suboptimal densities in this highly accessible location. References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not delivery method."
9	CBRE GI	05 Morden	Mo4		<p>5.3 2) Not justified – requirement for comprehensive development within site allocation MO4.</p> <ul style="list-style-type: none"> The policy has not looked at alternative strategies that can deliver Morden town centre regeneration and high density housing – incremental site by site development within the Morden Town Centre regeneration has been specifically excluded – but was accepted in previous development plans and accepted as being acceptable outside site MO4 Consideration of dividing Policy area MO4 into priority site phases/land uses – taking the approach that incremental development of key sites within an guiding masterplan concept of adopted masterplan – for example with the existing surface car park for used for a relocated bus station; replacement affordable housing on council owned sites across London Road. Policy not supported by an Opportunity Area Planning Framework as required by the London Plan. Not yet prepared or out for consultation – the Hawkins Brown masterplan no status. 	<p>Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method."</p> <p>The draft policy does allow for incremental proposals that support the vision and assist with the delivery of comprehensive regeneration and there are therefore many alternative ways that this large site can be delivered. The council and TfL are still committed to procuring a development partner to deliver comprehensive regeneration in accordance with a plan-led approach but this does not prevent sites from being developed incrementally. It would not be appropriate to capture detailed matters, such as 'priority site phases/land uses' within a site allocation as this might make the Local Plan insufficiently flexible. Detailed matters could be considered as part of the plan-led approach.</p> <p>In paragraph 5.1.12 with proposed modifications clarifies that <i>"The Wider Morden Town Centre Area Morden town centre (MM5.1) is within an Opportunity Area as designated in the London Plan 2021 and identified in Figure 2: Opportunity Area, in Chapter 1B 'Good Growth'. We will work with the GLA to (AM5.17) produce an Opportunity Area Planning Framework which will include the significant contribution that the Wider Morden Town Centre Area Morden Regeneration Zone (MM5.1) will make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs."</i></p>
9	CBRE GI	05 Morden	Mo4		<p>5.3 3) Evidence that comprehensive approach is deliverable over the 15 year plan period – and not all delivered in the last 5 years of the plan period.</p> <ul style="list-style-type: none"> Viability of the comprehensive approach – no evidence market take up in the post covid world and evidence of funding for such a large scale comprehensive development. The delivery is aspirational and not deliverable without the need to CPO many land ownerships within policy are MO4 Evidence that the Council been collaborative with private owners of sites within the Morden Regeneration area – and led only by public sector land owners seeking to reinvest the uplift to fund their own shortfall of funding for infrastructure. Not supported by an Opportunity Area Planning Framework as required by the London Plan. Not yet prepared or out for consultation – Hawkins Brown masterplan no status. 	As clarified in greater detail in the responses above to the same representors, Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method," and the draft policy does allow for incremental proposals that support the vision and assist with the delivery of comprehensive regeneration. The council have had numerous discussions with CBRE GI and other land owners of other smaller sites within the Morden Regeneration Zone and are committed to continue these discussions, which often include matters considered to be commercially confidential. AM5.17 in paragraph 5.1.12 clarifies that the council will work with the GLA to produce an Opportunity Area Planning Framework

9	CBRE GI	05 Morden	Mo4	<p>6.3 Chapter 5 of the Merton Development Plan is not sound for reasons given in section 5 and to make sound the plan needs to</p> <ul style="list-style-type: none"> Allocate the site for the mix of land uses as given in Appendix 2 within Policy M04. <p>(Appendix 2 – Proposed Mix of Land Uses Allocation of the site for a high density residential led, mixed use development within Morden Town Centre which can deliver:</p> <ol style="list-style-type: none"> Up to 200 residential units A landmark building of up to 20 storeys high. Residential component to comprise of no more than 65% for sale and at least 35% of affordable housing tenures, including 30% affordable rented, 40% low cost rent houses and 30% affordable intermediate. Provision for Class E uses. Provision of new private and public amenity space for residents Car free development, except for disabled access for residents and Class E uses as per adopted London Plan standards.) <p>...</p> <p>...include site in Appendix 2 to a new allocation within Deliv. M04 as per Appendix</p>	<p>It is not clear from the proposed modifications whether the proposal is for a new site allocation with the current text for Mo4 copied and modified as proposed or whether the new site boundary is to be shown on the map of Mo4 (as Mo4a?) and then the current text for Mo4 if modified to describe the features for both the proposed new 'phase 1' site and the remainder of the Morden Regeneration Zone. However, the council does not agree to the proposed new site allocation for the following reasons:</p> <ul style="list-style-type: none"> Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method." and the draft policy does allow for incremental proposals that support the vision and assist with the delivery of comprehensive regeneration. The proposed details in Appendix 2 would be broadly in accordance with Development Plan policies except for parts a. and b. for which further detailed information would be required. The proposed changes are not necessary to make the draft Local Plan 'sound'.
9	CBRE GI	05 Morden	Mo4	<p>Proposed modification in Appendix 3 of the response received for the 'Site description' part of the proposed new site allocation within Site Allocation Mo4:</p> <ul style="list-style-type: none"> Retail, office, commercial and community uses along London Road Sainsburys and commercial offices at 33-35 London Road, owned by the Verity Trust, Aberconway Road and Abbotsbury Road. 	<p>The proposed changes are not necessary to make the draft Local Plan 'sound' - refer to the related response above why the council does not support the creation of a new, separate site allocation.</p>
9	CBRE GI	05 Morden	Mo4	<p>Proposed modification in Appendix 3 of the response received for the 'Site owner' part of the proposed new site allocation within Site Allocation Mo4:</p> <p>Multiple landowners including Transport for London, Merton and the Verity Trustees Ltd private owners.</p>	<p>The proposed changes are not necessary to make the draft Local Plan 'sound' - refer to the related response above why the council does not support the creation of a new, separate site allocation</p>
9	CBRE GI	05 Morden	Mo4	<p>Proposed modification in Appendix 3 of the response received for the 'Site deliverability' part of the proposed new site allocation within Site Allocation Mo4:</p> <p>Commencement Land to be allocated for developments at 33-35 London Road to be the phase 1 development to be completed within 5 years of the plan's adoption; subsequent and delivery of sites in phases within 10-15 years.</p>	<p>The site address appears to be wrong and deliverability evidence would need to be submitted to support the stated claim that the works could be completed within the first 5 years of the plan. However, the proposed changes are not necessary to make the draft Local Plan 'sound' - refer to the related response above why the council does not support the creation of a new, separate site allocation</p>
9	CBRE GI	05 Morden	Mo4	<p>Proposed modification in Appendix 3 of the response received for the 'Indicative site capacity (new homes)' part of the proposed new site allocation within Site Allocation Mo4:</p> <p>circa 2000 200 homes at 33-35 London Road; 1,800 new homes on adjacent sites</p>	<p>The site address appears to be wrong and more detailed evidence would need to be provided to support the stated 'circa 200' homes. However, the proposed changes are not necessary to make the draft Local Plan 'sound' - refer to the related response above why the council does not support the creation of a new, separate site allocation.</p>
9	CBRE GI	05 Morden	Mo4	<p>Proposed modification in Appendix 3 of the response received for the 'Morden Regeneration Zone site vision' part of Site Allocation Mo4:</p> <ol style="list-style-type: none"> Comprehensive Regeneration sites within the Morden Regeneration Zone of the site, to optimise the delivery of new homes, improve the street scene and public realm, make it easier to get around, and support businesses and other appropriate town centre uses. The use of tall buildings at appropriate locations – including 33-34 London Road, where appropriate in order to optimise development that relates well to the surrounding context and public realm, particularly at street level. 	<p>The proposed change to point 2 is not necessary because proposed Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method." and the draft policy does allow for incremental proposals that support the vision and assist with the delivery of comprehensive regeneration.</p> <p>The proposed change to point 6 is not necessary because proposed Major Modification MM3.1 includes a reference to the Strategic Heights Diagram which clarifies that tall buildings would be appropriate on the site: "6. The use of tall buildings where appropriate and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone(MM3.1) in order to optimise development that relates well to the surrounding context and public realm, particularly at street level."</p>
9	CBRE GI	05 Morden	Mo4	<p>Proposed modification in Appendix 3 of the response received for the 'Design and accessibility guidance' part of Site Allocation Mo4:</p> <p>All proposals within the Morden Regeneration Zone are expected to support the above vision and to assist with the delivery of new town centre uses, including new homes, comprehensive regeneration, which realises the full potential of this highly accessible town centre site.</p> <p>Due to the fragmented nature of the ownership of the land, the proposals will need to include a land assembly strategy to facilitate the optimal development at this site, which may involve the use of CPO (Compulsory Purchase Order) powers if considered necessary and appropriate.</p> <p>...</p> <p>All development proposals will need to comply with London Plan requirements for being carbon neutral and this may be achieved by respective landowners providing. The comprehensive regeneration of this site will allow for innovative large-scale energy saving approaches and technologies to deliver a net-zero carbon development.</p> <p>...</p>	<p>The proposed removal of 'comprehensive regeneration' is not necessary because Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method." and the matters referred to in the proposed replacement wording 'new town centre uses, including new homes' are addressed in "...the above vision..."</p> <p>The reference to the potential use of the council's CPO powers "...if considered necessary and appropriate" should be retained and its proposed removal does not appear to address a soundness matter.</p> <p>The proposed removal of the phrase 'The comprehensive regeneration of this site will allow' is not necessary because Additional Modification AM5.7 clarifies that "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method." and the replacement wording merely compensates for the proposed removed phrase, without introducing new matters that are not already adequately addressed in Development Plan policies.</p>
10	Centrica Combined Common Investments	04 Mitcham		<p>On behalf of our client, Centrica Combined Common Investment Fund, we hereby submit representations to the LB Merton New Local Plan Stage 3 consultation. Our client is a significant land owner within Mitcham and welcomes the opportunity to comment on the emerging Draft Local Plan and has previously provided comments on the previous versions published for public consultation.</p>	Noted
10	Centrica Combined Common Investments	04 Mitcham		<p>Outside the Opportunity Area Mitcham Neighbourhood Our client supports the designation of Mitcham town centre as a 'District Centre' and notes that it is identified as 'low' for commercial growth and 'high' for residential growth in the Table A1.1 'Town Centre Network' in the London Plan. The table in the London Plan also acknowledges that Mitcham is an area for strategic regeneration.</p>	Noted
10	Centrica Combined Common Investments	04 Mitcham	N4.1	<p>Policy N4.1 Mitcham Our client supports the Policy objective to improve the vitality and quality of Mitcham town centre and in particular criterion (d) of the policy which seeks to "Deliver high quality mixed tenure homes that adds to the vitality of the Town Centre, in particular supporting mixed use developments with homes above shops in the town centre."</p>	Noted
10	Centrica Combined Common Investments	04 Mitcham	N4.1	<p>In order to achieve this objective, Mitcham town centre should be identified as a location suitable for "tall buildings" (6+ storeys / 18 metres in height) in order to optimise the delivery of residential use and add to the vitality of the town centre. Taking into account individual site circumstances it is likely that to arrive at a viable scheme, a development of +6 storeys will need to be formulated to meet the objective of the town centre being a high residential growth area.</p>	<p>No change proposed. The London Plan 2011 is clear on the policy framework for allocating tall buildings. Merton's Borough Character Study 2021 provides an in depth analysis which supports the council's position that Colliers Wood, Morden and Wimbledon are suitable for taller buildings in Merton's emerging local plan. The prevailing height in Mitcham town centre is 2-4 storeys. It is considered that the characteristics of Mitcham town centre will be able to accommodate buildings that do not exceed the heights stated in Merton's proposed policy D12 tall buildings while being able to accommodate more homes. This is also evidenced in Merton's housing delivery research which demonstrates that Merton's 5 year land supply and 15 year housing trajectory is not reliant on tall buildings being located in Mitcham</p>
10	Centrica Combined Common Investments	04 Mitcham	Mi8	<p>Site Allocation Mi8: 1-12 Majestic Way, Mitcham, CR4 2JS Our client fully supports the continued allocation of this site in the New Local Plan for future development. Site Owner: Please note the site owner is Centrica Combined Common Investment Fund.</p>	Additional mod to amend site owner Apply Centrica Combined Common Investment Fund
10	Centrica Combined Common Investments	04 Mitcham	Mi8	<p>Site Allocation: Our client supports the allocation of the site for mixed use to include the provision of residential use on the upper floors with retail, business, food and drink and community uses on the ground floor. Subject to suitable design and other development control considerations, the potential for residential use at ground floor level to optimize the provision of housing across the site, could also be appropriate. In addition, other uses suitable for a town centre location, such as leisure, should not be ruled out. However, this should be set within the context of Mitcham town centre having been identified as a "low" area for commercial growth in the London Plan.</p>	Agreed. Proposed additional modification to "site allocation" to state "Site allocation: Mixed use <u>town centre type</u> uses including retail, businesses, food and drink, <u>leisure</u> and community services (health centres, crèches, day nurseries, day centre on the ground floors, residential on upper floors.
10	Centrica Combined Common Investments	04 Mitcham	Mi8	<p>Indicative site capacity (new homes): The site allocation outlines the indicative capacity of the site to be 60 -160 new homes. However, it is unclear how this indicative range of units has been arrived at. Given the site is located within the town centre with very good access to public transport and services, in accordance with London Plan policy to optimise such sites for the delivery of much needed housing, this is a site that can and should accommodate a significant quantum of residential units, including affordable housing. The site can provide significantly more than the "60 - 160" new homes currently stated in the site allocation. In turn this would make a valuable contribution to meeting the Borough's housing requirements on a centrally located brownfield site which has been identified in the London Plan as an area for high residential growth. Initial studies by our client have demonstrated that the site could accommodate in the region of at least 230 residential units at an appropriate mix and scale for this town centre site. As such, our client recommends that the indicative site capacity for the site is amended to "at least 230 new homes".</p>	<p>Following pre app discussions for this site, officers consider a range of 60-160 homes represents a mixed use scheme that is suitable for the character and neighbouring scale of Mitcham Town Centre. No changes proposed.</p>

10	Centrica Combined Common Investments	04 Mitcham	Mi8		Design and accessibility guidance: Our client agrees that the site provides an opportunity to modernise and revitalise the town centre by supplying new homes and increase business floorspace in an accessible area. However, as noted above, it should be recognised that the balance will need to be struck between optimising the site for residential use and the provision of non-residential town centre uses to reach a viable scheme for the site.	Noted
10	Centrica Combined Common Investments	04 Mitcham	Mi8		Our client notes that the site allocation seeks that "development proposals must provide an active frontage along St Marks's Road, adding vitality and safety of the area." Whilst this is noted, this should not preclude residential use along this frontage that can also provide vitality, activity and surveillance over this area. The St. Mark's Road frontage is significantly limited in terms of its visibility due to the tree lined nature of the road and is not considered to be an appropriate location for retail/commercial uses. As such, any retail / commercial uses at ground floor along this frontage will be particularly difficult to attract occupiers, with a high risk of any units remaining vacant. Our client therefore seeks flexibility in the ground floor use along St. Mark's Road, as residential use could still provide an active frontage and security along this road. This approach would also reflect the identification of Mitcham as a high growth area for residential use and a low growth area for commercial use.	No change proposed. The "design and accessibility guidance" states <i>Development proposals must provide an active frontage along St Marks's Road, adding vitality and safety of the area. It does not stipulate any particular land use.</i>
10	Centrica Combined Common Investments	04 Places and spaces in a growing borough	D12.6		Policy No. D12.6 Tall Buildings As set out in the draft Policy, tall buildings are defined in the Borough as a minimum of 6 storeys or 18 metres, as per Policy D9 of the London Plan. The draft Policy acknowledges that tall buildings "are most suitable in town centre locations with good access to public transport". As such and in light of the definition of tall buildings, a designated District Centre, should be a location that is considered suitable, in principle, for tall buildings of 6 or more storeys. Our client therefore considers that specific reference should be made in the policy to the acceptability of tall buildings in Mitcham town centre. As a consequence, this should also be reflected in Policy N4.1 relating to Mitcham, as previously set out.	No change proposed. The London Plan 2011 is clear on the policy framework for allocating tall buildings. Merton's Borough Character Study 2021 provides an in depth analysis which supports the council's position that Colliers Wood, Morden and Wimbledon are suitable for taller buildings in Merton's emerging local plan. The prevailing height in Mitcham town centre is 2-4 storeys. It is considered that the characteristics of Mitcham town centre will be able to accommodate buildings that do not exceed the heights stated in Merton's proposed policy D12 tall buildings while being able to accommodate more homes. This is also evidenced in Merton's housing delivery research which demonstrates that Merton's 5 year land supply and 15 year housing trajectory is not reliant on tall buildings being located in Mitcham
10	Centrica Combined Common Investments	11 Housing	H11.1		Policy No. H11.1 Housing Choice Criterion 'e' of the draft policy sets out the strategic target of 50% of new homes in the Borough between 2021-2036 are to be "affordable." Our client notes that excluding public sector and industrial land, there is a minimum provision of 35% to be able to follow the 'Fast Track Route' as set out in the London Plan	Noted
10	Centrica Combined Common Investments	11 Housing	H11.3		Policy No. H11.3 Housing Mix The Draft Local Plan Policy H11.3 sets out the proposed approach to housing mix as between 1 bed (33%), 2 bed (33%) and 3+ bed units (34%). The policy notes that the "mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision. Whilst this flexibility is supported, it is not clear to as to how planning applications should reflect the table set out in the policy. London Plan Policy H10 'Housing size mix' advises that schemes should generally consist of a range of unit sizes. To inform the mix, local evidence will be important, as well as the need to deliver mixed and inclusive neighbourhoods. It is also necessary to deliver a range of unit types at different price points, and a range of tenures. Importantly, the policy also sets out that it is necessary to consider <i>The nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.</i> " The policy also confirms that applicants and decision-makers should consider optimising housing potential on sites; and the role of one and two bed units can play in freeing up family housing. This is a key issue in respect of the delivery of new homes on well connected town centre sites, such as 1-12 Majestic Way, Mitcham. On this site, a significant proportion of units would be suited as one or two bedroom units, given its location and as an area identified for residential growth. Certainly, it is not appropriate on such a site for the target of 34% 3+ bedroom units to apply or indeed expected that high density, town centre schemes could meet this requirement. Whilst it is recognised that an element of family housing is important to contribute towards inclusive communities, such a high proportion as set out in the draft policy is not wholly appropriate on town centre sites where the density of development should be optimised. Setting a rigid housing mix in the table within Draft Policy H11.3 is too restrictive and inflexible. Not enough emphasis is placed in the draft policy on the need to take account of the individual site circumstances, such as the site location. Clearly, a town centre site that is well connected to public transport where a higher density of development is promoted is not suitable for a high proportion of family housing, as set out in Policy H10 of the London Plan. Therefore, a blanket Borough-wide unit mix is not considered appropriate as each site and its location and characteristics should be taken into account when determining the appropriate unit mix. This should be set against the context of the Borough meeting the London Plan housing requirement for the plan period and the need to optimise site capacity through a design-led approach, as set out in Policy D3 of the London Plan	No change proposed. Individual site circumstances, including location, are already considered in the policy which state <i>The borough level housing mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision.</i>
10	Centrica Combined Common Investments	11 Housing	H11.3		The Draft Local Plan Policy H11.3 sets out the proposed approach to housing mix as between 1 bed (33%), 2 bed (33%) and 3+ bed units (34%). The policy notes that the "mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision. Whilst this flexibility is supported, it is not clear to as to how planning applications should reflect the table set out in the policy. Setting a rigid housing mix in the table within Draft Policy H11.3 is too restrictive and inflexible. Not enough emphasis is placed in the draft policy on the need to take account of the individual site circumstances, such as the site location.	Noted. No change proposed. Individual site circumstances including location, are already considered in the policy which state "The borough level housing mix will be applied having regard to relevant factors including individual site circumstances, site location, identified local needs and economics of provision" It is considered that Policy H11.3 contains an appropriate level of flexibility. It sets out how the policy will be applied having regard to relevant factors including individual site circumstances.
10	Centrica Combined Common Investments	13 Economy	TC13.5		Policy TC 13.5 Merton's town centres and neighbourhood parades The Draft Plan advises that within Mitcham town centre, inter alia, proposals should provide a range of commercial unit sizes and uses that contribute towards the vitality and viability of the town centre. Our client agrees with this approach but cautions that the provision of office use is market driven and as previously identified, Mitcham is identified as a "low" commercial growth area.	noted
11	Clarion Housing Group	01 Good Growth	01b		Clarion supports the Council's commitment to promote higher densities in neighbourhoods with good access to public transport and in opportunity areas, such as South Wimbledon in order to make the most of the limited land in the borough to address the acute housing needs in the borough and London. The commitment to produce an Opportunity Area Planning Framework (OAPF) for Wimbledon, South Wimbledon and Colliers Wood in order to fully realise growth and regeneration potential within this area is welcomed. Clarion would request early involvement in the preparation of the OAPF. We also support the statement that taller buildings can be right in some locations subject to excellent design, good public transport accessibility and impact on existing character. We acknowledge, and support, the Council's commitment to explore opportunities for estate regeneration in Mitcham. However, reference to this being a long-term aspiration should be removed. The Plan covers a 15 year period. Clarion are already progressing with the regeneration of the Eastfields Estate (as supported by the Estates Local Plan) and are also working on a programme to confirm which neighbourhoods are in greatest need of investment and the form that investment might take. This is likely to confirm a series of potential programmes of improvement to be developed and delivered over the Plan period. Should opportunities for sustainable development be identified during the Plan period, the draft Local Plan should positively support this noting the acute housing needs in the borough and limited land resources. This is particularly relevant noting that the London Plan targets assigned to the borough and other London borough fall short of meeting housing needs, as recognised by the London Plan Panel report and Secretary of State directions.	Noted - Eastfields regeneration has already started. Proposed additional modification to state Mitcham neighbourhood <i>Explore opportunities for social housing estate regeneration. We will engage and work with housing providers in Mitcham neighbourhood. The Council's ambition is that regeneration will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address several social and economic issues. This is a long-term aspiration which will continue outside this plan period.</i>
11	Clarion Housing Group	02 Climate Change	2.2		Clarion supports the promotion of environmentally sustainable design as an overarching principle for new development. It is noted that the draft Local Plan outlines the intention to set requirements beyond London Plan 2021 requirements via Policies CC2.2, CC2.3 and CC2.4. The result of meeting more stringent targets will be increased development build costs. Such additional development costs should be explicitly recognised within policy as having a direct impact on viability. The increase of a carbon offset payment from £95 per tonne (set out in the London Plan) to a minimum of £300 per tonne would also have impact on scheme viability, and the justification for this does not recognise physical site constraints which can also restrict the ability of a site to deliver net zero carbon i.e. limitations in roof space including having regard to competing planning considerations such as plant associated with air source heat pumps or the delivery of amenity roof gardens. The Council should robustly test the additional costs through their viability evidence base for the draft Local Plan to ensure that the additional costs arising do not render development unviable such that this could impact the delivery of homes, and in turn affordable housing	No change proposed. The council has robustly tested the increased costs through the Local Plan housing viability study evidence base https://www.merton.gov.uk/assets/Documents/Merton%20Local%20Plan%20Housing%20Viability%20Study%202020.pdf to demonstrate that this is deliverable. This considers policy requirements relating to affordable housing too. Raising the carbon offset to £300 per tonne reflects the true costs of offsetting carbon and is based on research carried out by five London boroughs. As most development is expected to reduce carbon on site (rather than offsetting) we expect that this should only be used <i>where it is clearly demonstrated that the net-zero carbon target cannot be fully achieved on site beyond the minimum requirements</i> (see policy CC2.2. minimising greenhouse gas emissions)
11	Clarion Housing Group	04 Mitcham	N4.1		Clarion support the general objectives of Policy N3.2. However to be consistent with the Good Growth Strategy chapter, the Council should re-iterate that opportunities for estate regeneration be explored in Mitcham.	No change proposed. Part (j) of the policy already states "improve the quality and mix of homes, including affordable homes" which can include development or regeneration. In addition, AM NUMBER proposes adding the following sentence to the supporting text to policy H11.2 housing provision, which states <i>We will encourage housing in sustainable brownfield locations. The 11,576 additional homes for the period 2021/22 - 2035/36 will come forward in Merton by intensification of housing as part of estate regeneration"</i>

11	Clarion Housing Group	04 Mitcham	N4.1	d	In addition, part d. of the Policy should be amended to support intensification and higher density mixed use residential development to reflect the high residential growth potential identified for the district town centre in the London Plan, and also other London Plan policies which promote increased housing supply and growth in and around town centres (Policies H1, SD6, SD7 and SD8). London Plan Policy H1 also supports the optimisation of sites located within 800m of a town centre boundary and this should be reflected in the policy wording for the surrounding area of Mitcham Town Centre	No change proposed. Part (j) of the policy already states "improve the quality and mix of homes, including affordable homes" which can include development or regeneration. In addition, AM NUMBER proposes adding the following sentence to the supporting text to policy H11.2 housing provision, which states "We will encourage housing in sustainable brownfield locations. The 11,576 additional homes for the period 2021/22 - 2035/36 will come forward in Merton by intensification of housing as part of estate regeneration"
11	Clarion Housing Group	04 Mitcham	N4.1	m	Support for the regeneration and intensification of the Ravensbury and Eastfields Estates should also be reflected in the policy wording, as a new sub-point between part l. and m. This would be consistent with the acknowledgement of both estates as major development sites at paragraph 4.2.9, and would ensure consistency with the Estates Local Plan which will remain part of the Local Plan.	Agreed. Proposed additional modification to Policy N4.1 Mitcham (m) to state Support the regeneration at Eastfields, Ravensbury and Pollards Hill to provide good quality new homes and services and refurbish existing homes in a landscaped setting. Associated new paragraph 4.1.17. The London Plan 2021 identifies Mitcham as an area with potential for housing growth. Merton's Borough Character Study 2021 analyses the existing character of Mitcham's neighbourhoods, which are generally lower density and low rise. We will continue to support the development of new homes and associated infrastructure in Mitcham in site allocations, in incremental development and via estate regeneration. Merton's Estates Local Plan 2018 guides the regeneration of Eastfields and Ravensbury estates, which are underway and will provide a substantial number of new homes and considerably improve the housing stock over the next 15 years. Regeneration plans have also been developed for Pollards Hill to provide new homes to the south east of the borough.
11	Clarion Housing Group	07 South Wimbledon	N7.1	j	Clarion welcomes the ambition to recognise South Wimbledon as a distinctive neighbourhood in its own right, and supports the proposals for a new Local Centre around the underground station. The regeneration of High Path is a fundamental factor in achieving this, with the outline planning permission allowing for the delivery of new and improved commercial and community floorspace. Taking account of the proposals at High Path, the following amends should be made to the policy: <u>"Recognising South Wimbledon as a distinctive neighbourhood in its own right to create a vibrant, attractive and thriving new local centre supported by the regeneration proposals at High Path which will deliver higher density housing-led development, along with flexible nonresidential floorspace and a new public park, providing economic, social and environmental benefits. Housing delivery will be optimised given the areas excellent access to public transport, improved access to amenities which will be provided by the new local centre and sites location within the Wimbledon, South Wimbledon and Colliers Wood Opportunity Area We will do this by:</u> ... <u>j. Work with the regeneration phases being delivered on the High Path estate over the next 10- 15 years, guided by the Estates Local Plan; to deliver intensification and the optimisation of housing delivery alongside non-residential uses to support the new Local Centre, and this includes the proposed public park at High Path;"</u>	No change proposed. (j) states <i>Work with the regeneration phases being delivered on the High Path estate over the next 10-15 years, guided by the Estates Local Plan; this includes the proposed public park at High Path;</i>
11	Clarion Housing Group	07 South Wimbledon		254	On page 254, an image of the draft High Path masterplan proposals is included. Clarion request that an updated image is included to reflect the detailed design approved at Phases 1 and 2. This can be provided to Officers	Noted with thanks. The existing image will be replaced (see other reps)
11	Clarion Housing Group	09 Wimbledon	W18		Clarion supports this allocation, adjacent to the High Path Estate, and the intent to consult with Clarion to optimise housing delivery on both sites	Noted
11	Clarion Housing Group	11 Housing	H11.1 (d)		Whilst Clarion is generally supportive of the requirements to achieve accessible and adaptable dwellings, it is important that this policy or supporting text acknowledges that compliance with Building Regulation Requirement M4(2) can result in viability and service charge affordability issues, particularly in smaller flatted blocks. As such, as per the flexibility acknowledged in the London Plan (refer to paragraph 3.7.6), the Local Plan should recognise that in some circumstances this requirement would not be imposed.	Agreed. Minor mod to H11.1 Housing Choice, d. <u>Provide step-free accessible and adapted housing</u> in accordance with London Plan Policy D7 (Accessible housing) and Building Regulation Requirement M4(2) and M4(3) <u>and this Local Plan's policy D12.3 Ensuring high quality designs in all developments 90% of all new build housing is required to be 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings</u> D12.3 Ensuring high quality design in all developments part I I. In residential developments, provide a mix of tenure and unit types with at least 10% of homes that meet Building Regulation Requirement M4(3) for 'wheelchair user dwellings' <u>and all other dwellings meeting Building Regulations Requirement M4(2) 'accessible and adaptable dwellings'</u> as set out in London Plan 2021 Policy D7 "Accessible housing" Policy H11.1. And the justification para 12.3.2 12.3.2. Well sized and proportioned rooms contribute to designing successful homes. Housing developments should consider accommodating <u>Building Regulations Approved Document Part M, Appendix D: Furniture Schedule</u> in their lay outs. <u>To ensure homes are accessible to everyone regardless of their mobility or age, housing developments should also be step free, accessible and adaptable in line with London Plan 2021 policy D7 'accessible housing' and Approved Document M: flexibility may apply within blocks of 4 storeys or less in certain exceptional circumstances as outlined in London Plan policy D7</u>
11	Clarion Housing Group	11 Housing	H11.1		As a Registered Provider, Clarion supports the ambition of the affordable housing policy and also that it acknowledges that viability plays an important role in the delivery of housing. The policy should however acknowledge the specific circumstances of estate regeneration schemes, to conform with London Plan Policy H8, and supporting text to London Policy H4 which confirms that proposals that involve the demolition of existing affordable dwellings must follow the Viability Tested Route	Minor mod added for clarity <u>11.1.39. Estate regeneration that involves the loss and replacement of affordable housing should deliver an uplift in affordable housing wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.</u>
11	Clarion Housing Group	11 Housing	H11.1		Clarion request the addition of a new point between part a. and b. "Support proposals to improve the quality of existing homes."	Noted. A further minor change is proposed to Policy H11.2(e) to address the suggested amendment. It is considered that the essence of the suggested wording would be more appropriately incorporated at point e of policy H11.2. The following further change is proposed: Supporting the redevelopment of poor quality existing housing <u>and proposals to improve the quality of existing homes</u> that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis.
11	Clarion Housing Group	11 Housing	H11.2(e)		Clarion welcome the Councils support for the redevelopment of poor quality existing housing and the aspiration of the policy to preserve the number of residential units / affordable housing units. However, assessing the potential loss of accommodation on a unit basis is not consistent with the London Plan and Mayor of London SPG documents on Housing (2016), and Affordable Homes and Viability (2017). As such, the policy should be amended to refer to habitable rooms or floorspace.	No further change proposed. The London Plan is part of the development plan. The Council worked closely with the GLA in the preparation of Policy H11.2 and supporting text and the GLA have formally confirmed that it is in conformity with the London Plan.
11	Clarion Housing Group	11 Housing	H11.2(e)		"Supporting the redevelopment of poor quality existing housing that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis <u>in doing so, the Council will expect that housing delivery is optimised to make best use of the land</u> "	Not supported. No further change proposed. Suggested additional text is not exclusive to Policy H11.2 point (e) but relates to all elements of the policy and is already covered under points (a) and (c).
11	Clarion Housing Group	11 Housing	H11.2	Para 11.2.1	Suggested addition (underlined): Bringing forward housing capacity through regeneration, including Morden town centre <u>and Wimbledon, South Wimbledon, Morden and Colliers Wood Opportunity Area.</u>	Noted. Minor change to address this response proposed. However reference to Merton's Opportunity Area will reflect the description set out in the London Plan and state: including Morden town centre and <u>Merton's Opportunity Area of Wimbledon, South Wimbledon and Colliers Wood</u>
11	Clarion Housing Group	11 Housing	H11.2	Para 11.2.1	Suggested addition (underlined): <u>Intensification of housing as part of estate regeneration proposals.</u>	Noted and supported. Minor change proposed by addition of suggested wording as additional bullet point to Para 11.2.1.
11	Clarion Housing Group	11 Housing	H11.2	Para 11.2.1	Suggested addition (underlined): Enabling mixed use development within the town centres <u>optimising housing delivery via higher density mixed use development in town centres and higher density housing-led development close to town centres.</u>	Not supported. No further change proposed. The existing bullet point clearly and aptly states the objective and the suggested wording is considered unnecessary. The draft Local Plan should be read as a whole and there are a number of policies contained elsewhere in the plan that address development in towncentres and optimising housing delivery including chapters: <i>Neighbourhoods; Places and Spaces in a Growing Borough</i> and <i>Good Growth Strategy</i> .

11	Clarion Housing Group	12 Places and spaces in a growing borough	12.6		<p>Clarion welcomes the inclusion in the policy that tall buildings can "also be suitable on sites that can demonstrate that they are suitable for tall buildings through townscape analysis and a masterplan approach to design and delivery".</p> <p>We welcome the acknowledgement of the High Path estate within the policy. However, South Wimbledon (which the High Path estate falls within) should be included within the third paragraph of the policy (and subsequent policy wording – see below) alongside the town centres of Colliers Wood, Wimbledon and the wider Morden town centre. Given the quantum of new homes planned for South Wimbledon and its identified potential for additional housing, commercial and employment growth in the draft Local Plan, there is a strong case for it to be specifically referenced as a location suitable for tall buildings.</p> <p>There are taller buildings already located in South Wimbledon, and taller buildings have been approved as part of the High Path regeneration. Although dated, the Tall Buildings Background Paper (2010) also recognises High Path as an area where tall buildings could be explored as part of a masterplanning exercise. In this regard, the masterplanning exercise carried out by Clarion (and accepted by the Council via the grant of outline planning permission) has demonstrated the suitability of the site for tall buildings. There is also support for taller buildings at High Path in the Estates Local Plan where Policy EP H8 states: "Taller buildings may be considered appropriate to facilitate intensified use of the site. Such buildings must be located appropriately and relate well to the surrounding context and public realm, particularly at street level."</p> <p>London Plan Policy D9 says that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements the plan. This process should involve a consideration of the areas identified for growth. The spatial strategy for the borough, as outlined in early chapters of the draft Local Plan identifies South Wimbledon as one of the growth areas in the borough. The potential for growth and higher densities is also a key driver for the support for the regeneration in the Estates Local Plan.</p> <p>In addition, the Council's Character Study SPD outlines criterion for considering the suitability of sites for tall buildings, with reference to proximity to a town or local centre, opportunity or intensification areas, proximity to a public park, proximity to a station, and accessibility to public transport. In this regard the following is noted:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A local centre is planned at South Wimbledon, inclusive of parts of High Path. <input type="checkbox"/> High Path falls within an opportunity area <input type="checkbox"/> High Path proposes to deliver a public park <input type="checkbox"/> High Path is adjacent to South Wimbledon station and has excellent public transport accessibility. <p>It is therefore clear that High Path is suitable for tall buildings in principle.</p> <p>Eastfields Opportunities for growth are also identified in other parts of the borough including around the town centres, for example Mitcham. In the absence of any up-to-date</p>	Officers have reviewed Policy D12.6 with input from the GLA and some revisions have been made. The Estates Local Plan will remain a Merton Local Plan document and this is now specified in this policy. In discussions with GLA officers, the wording "also be suitable on sites that can demonstrate that they are suitable for tall buildings through townscape analysis and a masterplan approach to design and delivery" has been removed. This does not clearly demonstrate specific locations appropriate for tall buildings.
11	Clarion Housing Group	12 Places and spaces in a growing borough	D12.6		<p>Policy Amendments</p> <p>The following amendments should be made to the Policy: <i>Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan. In the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and sense of place. They can act as visual markers, such as the redeveloped Britannia Point in Colliers Wood, provide architectural variety, such as Glebe Court in Mitcham, and optimise a sites potential for homes and jobs such as the future of High Path in South Wimbledon and Eastfields in Mitcham. It is crucial that tall buildings are of the highest quality of design and construction.</i></p> <p><i>Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre, South Wimbledon and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case."</i></p> <p>Additional sub-points after r. s. <i>They form part of a masterplan-led regeneration proposals developed having regard to townscape analysis, such as the masterplan proposals at High Path and Eastfields estates."</i></p>	Officers have reviewed Policy D12.6 with input from the GLA and some revisions have been made. The Estates Local Plan will remain a Merton Local Plan document and this is now specified in this policy. Townscape analysis is covered in Policy D12.6(g). No further changes.
11	Clarion Housing Group	13 Economy	13.6	13.6.4	Paragraph 13.6.4.... says "the Primary Shopping Area is where the council would expect to see a large concentration of convenience, comparison and service retail shops (E Use Class)". We suggest this should include community and leisure uses falling under Use Class E to reflect the strategy for High Path which includes community and commercial uses along Morden Rd and Merton High Street within the Primary Shopping Area	No change proposed. Use Class E contains a wide range of uses and no need to list them all here.
11	Clarion Housing Group	N/A			Clarion looks forward to working closely with the Council to deliver new homes (including affordable housing) and sustainable neighbourhoods within the borough. It welcomes the ambition of the draft Local Plan in this regard, however, it is respectfully asked that consideration be given to the comments raised above with a view to supporting opportunities to improve the quality of existing housing, to deliver new homes (including affordable housing) and to facilitating regeneration opportunities to make the best use of the limited land resources in the borough. We ask that the Council continues to engage with Clarion in its consultations and we would like to be kept informed about opportunities to participate in the examination process as the draft Local Plan progresses. We would be grateful for confirmation that this letter of representation has been received. Should you have any questions regarding its contents please do not hesitate to contact myself or Samruti Patel at these offices.	Noted
11	Clarion Housing Group	N/A			Clarion Housing Group owns and manages around 10,000 homes in the London Borough Merton (LBM), and is one of the Council's preferred Registered Providers of affordable housing. Clarion supports the strategic aims of the draft new Local Plan to deliver: sustainable growth, opportunities and benefits for residents, affordable homes, jobs and other facilities needed to support growth; whilst continuing to preserve and creating attractive places to live, work and visit. Since 2010 Clarion has invested in modernising and upgrading Merton's housing stock and this work is ongoing. They have also secured permission to regenerate some of the poorest quality homes at Ravensbury (in Mitcham), Eastfields (in Mitcham) and High Path (in South Wimbledon). Work to progress these regeneration proposals continues, with the first homes handed over at Ravensbury and High Path. Outline planning permission for the regeneration of these three estates, has already been secured by Clarion, and as part of this over 2,700 new homes will be delivered in total, alongside new employment and community spaces, and new open space. Reserved matters have been approved for the next phase at High Path and the remaining phases at Ravensbury. Design work on the first phase at the Eastfields regeneration is being finalised and a reserved matters application is planned to be submitted in November 2021. Policies addressing the regeneration of these estates, contained within the Estates Local Plan (2018), are to be saved as part of the new Local Plan. Clarion continue to explore opportunities for further investment with a view to delivering greater sustainability benefits, better quality and new homes, employment and training opportunities and enhanced community infrastructure for their residents and the wider Merton community. Clarions' work to continually improve and extend the life of existing housing stock, and improve the life chances of the existing and future communities will continue over the 15 year Plan period. This will include the potential for significant programmes of refurbishment and/or regeneration of other neighbourhoods where the need is greatest and where opportunities for sustainable development exist. A programme to confirm which neighbourhoods are in greatest need of investment and the form that investment might take is already advancing; and residents engagement will form a key part of this process. Any new homes built as part of future programmes of regeneration will align with national and local carbon targets. Clarion itself is going beyond those current national targets. It has made a commitment to transition away from fossil fuels in all developments from 2022; from 2023 all new homes will be zero carbon compatible (i.e. low energy and no fossil fuel usage); from 2024 all new social and affordable rented homes will be net zero carbon (including in operation); from 2025 all new homes, commercial and community buildings will be net zero carbon With this above mind Clarion has the following comments:	Noted
11	Clarion Housing Group	Policies Map	opportunity area map		Clarion supports the expansion of the Opportunity Area to include the Ravensbury Estate.	Noted
11	Clarion Housing Group	Policies Map			Green Infrastructure Map 2 - Eastfields The approved regeneration scheme at Eastfields (ref: 17/P1717) proposes development on a small quantum (approx. 0.6ha) of poor quality designated open space that runs along the site's boundary with the cemetery. Merton's Estates LP Policy EP.E5 (a) states that There must be equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quality and quantity to a suitable location within the estate. The approved scheme provides replacement public open space within the siteboundary. As such it was accepted that the development could proceed on the designated open space. The Development Zone parameter for Eastfields is appended to this letter showing the zones identified (and approved) for development	Officers have reviewed the approved plans and agree that the boundary of Open Space C004 should be amended to reflect the planning approval.

12	CPRE London	09 Wimbledon	Wi3	<p>Comments on Merton's New Local Plan policies, site allocations or land designations which we would like the inspector to consider at their Examination in Public:</p> <p>CPRE London is a membership-based charity with 2500 members across London concerned with the protection and enhancement of London's green spaces for the benefit of all Londoners.</p> <p>We would like the inspector to consider the following at their independent examination of the plan:</p> <p>There are contradictions and inconsistencies relating to Wimbledon Park which make the policies unimplementable and therefore the Plan unsound – reference 09 Wimbledon Merton Local Plan Reg19 July21.pdf Wimbledon: Policy N9.1 – Surrounding Neighbourhoods Policy N9.1 q and Site Allocation Wi3</p> <p>1. Proposals for the All England Lawn Tennis Club (AELTC) promote the development of Wimbledon Park but this site is protected Metropolitan Open Land so cannot be developed. The Plan contains no proposal to remove the MOL status – which would of course require substantial justification.</p> <p>2. The inclusion of Wimbledon Park in the Site Allocation introduces a presumption of development, contrary to the MOL protection, and is inappropriate. Any reference to expansion into, or development of, the park, should be excluded from references to proposals relating to the All England Lawn Tennis Club. Wimbledon Park should be excluded from any maps relating to Site Allocations or proposals for the AELTC, to ensure consistency with the MOL designation.</p> <p>Please note there are important inconsistencies with the maps and commentary. These are explained eloquently in the Wimbledon Park Residents' Association submission to which I would refer you.</p> <p>I would be grateful if you ensure these comments are passed to the inspector.</p> <p>Kindly acknowledge safe receipt of these comments.</p>	<p>No further change proposed. The proposed site allocation Wi3 of "World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake" accords with NPPF paragraph 99(c) and London Plan 2021 policy G3 Metropolitan Open Land and the policy O15.2 in Merton's emerging local plan. There is substantial precedence for sports and recreation on MOL. The emerging local plan does not propose to remove the MOL designation.</p>
12	CPRE London	Policies Map		<p>Please note there are important inconsistencies with the maps and commentary. These are explained eloquently in the Wimbledon Park Residents' Association submission which I would refer you.</p>	<p>Noted. Comments are provided separately on the Wimbledon Park Residents' Association submission.</p> <p>No further action required.</p>
13	Dawson D	Policies Map	SINC	<p>Two cartographic errors in the boundaries of the nature conservation sites should be corrected, so as to add the part of Ashen Grove Wood within the public park and the railsides between the park and the Arthur Road bridge.</p> <p>An old error that omitted the Wimbledon Park Grade II* landscape from the Wandle Valley Regional Park should be redressed by including it within the Regional Park.</p> <p>Nature Conservation Sites The Wimbledon Park nature conservation sites were depicted accurately in the character assessment of the Conservation area, but inaccurately in the proposed revisions to the local plan. These are presumed to be drafting errors, because there has been no material change to the nature conservation interest since the original designation, but the error was not addressed by the The Environment Partnership (Proposed changes to Wimbledon Environmental Maps, November 2020). Ashen Grove Wood is ancient, and the omitted part has several old trees. Extensive engineering work by London Underground Limited to the tube line adjoining Wimbledon Park did not affect the eastern linesides and the western sides were restored to nature</p> <p>Two corrections are needed to restore the nature conservation sites to the boundaries as confirmed, after extensive consultation, in the handbook Nature conservation in Merton. These are shown on my plan.</p>	<p>Officers have reviewed the maps in line with the 2 comments made in the submission. Responses on these are below:</p> <p>1. Ashen Grove Wood - Officers agree that the SINC boundary should be amended to include the part of Ashen Grove Wood to the east of the current SINC boundary. The Policy Maps will be updated to reflect this through a modification.</p> <p>2. SINC along railsides - The area highlighted in the respondent's map between the park and Arthur Road bridge is already included as SINC and no changes are proposed to this area through the new Local Plan. Officers do not recommend any changes.</p>
13	Dawson D	Policies Map	Wandle Valley Regional Park	<p>Wandle Valley Regional Park, policy O15.6</p> <p>The plan of the Regional Park excludes Wimbledon Park. This reflects an error dating back many years, when submissions were made that the heritage site belongs within the Regional Park for two reasons. First, is that Wimbledon Park Brook flows to the Wandle at Earlsfield, demonstrating hydrological continuity between the lake, its catchment and the River Wandle. Second, is that the Capital Ring London orbital footpath crosses the Wandle at Earlsfield and continues west to pass through Wimbledon Park, providing a strategic footpath link.</p> <p>There is no logic to including Mitcham Common and Cricket Green, which are separated from the course of the Wandle by a comparable distance, when Wimbledon Park is excluded, but the submission was ignored. This should be redressed, and the whole Wimbledon Park heritage landscape should be included within the Regional Park.</p>	<p>The Wandle Valley Regional Park boundary remains consistent with the boundary shown in the current 2014 Sites and Policies Plan. This was published as part of the Stage 3 consultation under Green Infrastructure Policy Maps.</p> <p>Wimbledon Park is not shown as part of the Wandle Valley Regional Park as it does not fall within this area. This is consistent with the All London Green Grid. No changes are proposed by officers to the All London Green Grid.</p> <p>In response to the comment on Mitcham Common, the Wandle Valley Regional Park also extends into the neighbouring London Borough of Sutton where the land adjoins Mitcham Common. No changes are required here.</p>
13	Dawson D	N/A		<p>The Wimbledon Park heritage landscape spans the London Boroughs of Merton and Wandsworth and is in divided ownership, making it at risk from uncoordinated management.</p>	<p>Noted. This is not a comment on the emerging policies.</p>
13	Dawson D	09 Wimbledon	Wi3	<p>It is threatened by an unnecessary new site allocation Wi3, which would make incoherent a previously coherent policy across two boroughs and three land owners and prejudice planning decisions in favour of development incompatible with Metropolitan Open Land policy. The proposed new site allocation should be revised to apply solely to the land holdings of the All England Lawn Tennis Club west of Church Road.</p>	<p>No further change proposed. The site allocation Wi3 is for "world class sporting venue of national and international significance with support for continued and long term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake". The site allocation does not propose to remove the MOL or heritage designations and provides an opportunity to address the fragmented land ownership and management which is identified as a cause for the Grade II* listed Wimbledon Park being on the Heritage at Risk Register</p>
13	Dawson D	Sustainability Appraisal		<p>The sustainability appraisal for Wimbledon Park is wishful thinking.</p> <p>Some of the proposed monitoring of Heritage features in the sustainability appraisal is confined to the built heritage, so omitting the heritage of the historic park. This is a very significant omission, biasing the appraisal. The appraisal for heritage features and biodiversity in Wi3 is wishful thinking, unless the land east of Church Road should be excluded from the site allocation.</p>	<p>No further amendments proposed. The sustainability appraisal objective 5 on heritage is not limited to the built environment only but states " heritage (including architectural and archaeological heritage): To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings",</p>
13	Dawson D	N/A		<p>Evidence base I am a professional environmental scientist. When employed by the London Ecology Unit, I initiated, developed and established the London hierarchy of Sites of importance for nature conservation and took a leading role in Biodiversity action planning. I provided much expert evidence for both forward and development control planning for some 20 London Boroughs. As joint head of the Mayor of London's Environmental Group, I led the work on the Mayor of London's biodiversity strategy. Locally, I was joint author of the handbook Nature conservation in Merton and have been studying the history and ecology of Wimbledon Park for some 38 years, including extensive documentation of the birds, flora and the lake. I advise the Friends of Wimbledon Park on environmental and historical matters and wrote the booklet: Capability Brown's Wimbledon Park, a history and many topic papers, including one on Ashen Grove Wood.</p>	<p>Noted and acknowledged</p>
13	Dawson D	N/A		<p>Background The open Space called Wimbledon Park (mapped above) is the subject of these observations. It is recognised by Historic England as a grade II* historic park (list #1000852) but is in generally unsatisfactory condition, with localised problems and declining quality. It was added to their at-risk register in June 2016 because of the condition of the lake, designed views being obscured and that the divided ownership results in discordant landscape management. It is owned by the London Borough of Merton, the Wimbledon Club and the All England Lawn Tennis Club and spans two London Boroughs: Merton and Wandsworth. The whole heritage landscape should be planned as one to help overcome its problems.</p>	<p>Noted. This is not a comment on the emerging policies.</p>
13	Dawson D			<p>Existing policy. The existing local plans of Merton and Wandsworth have coherent policies applying to the whole historic landscape to help overcome the problems and to ensure that any development balances economic gain against the various values of open land.</p>	<p>Noted. This is not a comment on the emerging policies.</p>

13	Dawson D	09 Wimbledon	Wi3		Proposed AELTC development site in the draft revisions 1. A new site allocation Wi3 is proposed over the land holdings of the All England Lawn Tennis Club (AELTC), including the present-day golf course across Church Road to the east of the existing AELTC development. The claimed justification is the considerable economic impact of visitors to the Grand Slam and tennis museum. The plan that I reproduce in the headline to this submission (above) shows the great extent of this proposal. 2. This new allocation is linked into a proposed Wimbledon Policy (9.1q and 9.1.35) which seeks an upgrade and improvement of the AELTC facilities either side of Church Road. 3. The existing protection of the golf course is continued in the proposed new plan as it continues to show the Merton section of the heritage landscape as Historic Park, Metropolitan Open Land and Archaeological Priority. The nature conservation site is mapped, if erroneously (see below). These designations (and the Wimbledon Club) are mentioned in the new site allocation, Appropriate policies are included in the proposed revisions to the plan (O15.1-4). However, Wi3 gives no detail of the nature of the open space values on the golf course 4. In the site allocation, reference is made to improving public access to Wimbledon Park Lake, presumably the walkway around the lake that is required once golf ceases under the terms of the sale of the golf course by LB Merton to the AELTC in 1993	
13	Dawson D	09 Wimbledon	Wi3		5. This new allocation is appropriate for the intensively built-up parts of the AELTC west of Church Road, which cannot realistically be considered to the open space of any category. This view is supported by the revisions to open space and Metropolitan Open Land designations there as recommended in the Green Infrastructure Biodiversity and Open Space Study. However, the effect of the new allocation to the east of Church Road is to introduce incoherence to a previously coherent policy in that a substantial part of Heritage Wimbledon Park is now proposed for development to attract visitors.	No further change proposed. The site allocation Wi3 is for "world class sporting venue of national and international significance with support for continued and long term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake". The site allocation does not propose to remove the MOL or heritage designations and provides an opportunity to address the fragmented land ownership and management which is identified as a cause for the Grade II* listed Wimbledon Park being on the Heritage at Risk Register. It also provides an opportunity for greater public access to and through the landscape
13	Dawson D	09 Wimbledon	Wi3		6. The incoherence is evident where the proposed site allocation is wrapped right around another ownership, the Wimbledon Club, and cut short at the borough boundary to the north and LB Merton land holdings to the east, none of which are subject to a site allocation for development. This piecemeal view compounds the existing problems from multiple ownership of the land and so the risk to the Grade II* historic park. The introduction of any substantial built development on Metropolitan Open Land would necessitate revision of its boundaries, as has already become necessary on the existing AELTC land on the ex-Aorangi sports ground. Opening a door for such damaging development is entirely inappropriate, so it is clear that the site allocation should be confined to the AELTC land west of Church Road. This would leave the golf course protected by policies that already include appropriate provision for achieving a balance between protection and development.	No further change proposed. The site allocation Wi3 is for "world class sporting venue of national and international significance with support for continued and long term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake". The site allocation does not propose to remove the MOL or heritage designations and provides an opportunity to address the fragmented land ownership and management which is identified as a cause for the Grade II* listed Wimbledon Park being on the Heritage at Risk Register
13	Dawson D	09 Wimbledon	Wi3		7. The threat to the golf course land is illustrated by a planning application presently under consideration by LB Merton. This proposes 38 new grass courts, reprofiling of land, many access pathways, loss of trees, new access and car parking and new buildings, including an 8000-seat show court. Achieving the right balance between amenity, historical, biodiversity and heritage and economic development in any such proposal would be best achieved without the prejudice introduced by site allocation Wi3.	no further amendment proposed
14	Environment Agency	15 Green Infrastructure	O15.3		We welcome how the new local plan explains how Biodiversity Net Gain (BNG) is expected to be applied. We recommend updating this to specify that Biodiversity Net Gain must include an improved river corridor if there is a river on / adjacent to the site. We recommend a 10 metre buffer where this is possible, and restoring natural banks and processes to the watercourse where this is feasible. BNG requirements are evolving as legislation and guidance is finalised and rolled out. We recommend the policy references the need to refer to the latest guidance and legislation regarding BNG.	Support for policy is noted. Officers have reviewed the biodiversity policy and agree that wording should be added to Policy O15.3(d) to ensure that river corridors are improved and restored through biodiversity net gains. Wording will also be added to the supporting text with a reference to good practice guidance for BNG
14	Environment Agency	All			We welcome the Merton new local plan which has been updated with our comments and previous feedback. We support the focus on protecting and enhancing the environment and adapting new and existing infrastructure to the impacts of climate change and more extreme weather events. We welcome the updated policies on flood risk management, river restoration, pollution prevention, Wandle Valley Park, biodiversity, climate change, water efficiency and sustainable design and construction. We welcome the addition of the rivers to the overview map (Figure 1, page 16). We recommend the river names are also added to the map. Delivery of the new local plan policies requires ongoing cross boundary and catchment working to deliver environmental improvement across the Wandle catchment. To adapt the urban environment requires ongoing multi agency and community liaison to identify issues and opportunities to make Merton resilient to extreme events such as summer heatwaves, poor air quality and extreme storm events. The new local plan policies and future planning application decisions are key to improving the urban environment and delivering an increased amount of green space to adapt the environment for people and wildlife. We are keen to continue to working with you to identify any pollution / amenity issues and the key environmental infrastructure required to support delivery of your housing targets to ensure the environment is protected and enhanced.	Noted. The council will continue to work with the EA to identify any key environmental infrastructure requirements.
14	Environment Agency	05 Colliers Wood	CW5		Site allocation: CW5 Colliers wood We recommend the policy is updated to include the need to enhance the Pickle Stream corridor as part of the redevelopment, to remove concrete banks, and restore ecology to the watercourse, and a 10 metre wide riverside buffer strip	Officers agree that the 10m requirement should be added on ecological grounds. Wording has been added to the site allocation under Design and accessibility guidance to reflect this.
14	Environment Agency	06 Raynes Park	RP3		RP3 should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor to provide a biodiversity net gain. There should be an emphasis on providing a significant improvement in the green corridor.	This is now covered by the change made to Policy O15.3(d) at the request of the Environment Agency, to ensure river corridors are improved and restored through biodiversity net gains. Officers do not recommend changing the Site Allocation, to avoid duplication
14	Environment Agency	Evidence	SEA		Environmental evidence and data We welcome the updated Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) July 2021 which has been updated to include the strategies and plans we highlighted in our last consultation responses such as EA2025 and the Governments 25 year environment plan. The following water resources should be added to the SEA/SA section on Water (page 68) and the out of date strategies removed. Thames Water Resources strategy (April 2020) https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf We support the Sustainability Objectives and the local plan monitoring indicators in Figure 10 in the SA/ SEA relating to flood risk management, climate change, air quality, water resources, water quality, water consumption, open space and nature. To strengthen the local plan monitoring further we recommend adding in some additional indicators below to assess the ongoing status of the environment and delivery / review of the local plan policies. Flood risk and climate change Number and location of Environment Agency flood warnings issued across LB of Merton annually Water quality Number and location of water pollution incidents reported to the Environment Agency across Merton annually Water quality status of water bodies across Merton Open space and nature Metres of main river improved and restored across Merton Biodiversity Net Gain delivered across LB of Merton We recommend the evidence base for the local plan is regularly reviewed. New planning policies and decisions should be based on the latest environmental evidence on flood risk, water resources and climate change. For the latest environmental data see the Defra data services platform https://environment.data.gov.uk/	Officers have reviewed and amended the Sustainability Appraisal and Strategic Environmental Assessment where changes were deemed appropriate.
15	F&C Property Holdings	01B Good Growth	01b		Chapter 01B: Good Growth Strategy Chapter 01B sets out the Council's commitment to high quality developments and that higher densities will be appropriate in certain areas: "In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough's acute housing needs." BMO acknowledges and supports the approach in encouraging higher densities within highly accessible town centre locations such as Wimbledon Town Centre – this is a well-recognised and well-established NPPF and London Plan policy stance. Wimbledon is identified as a defined "Major Centre" within the London Plan (with "high residential and commercial redevelopment potential). It is a major Opportunity Area (within the wider Colliers Wood and South Wimbledon area) identified for new jobs and homes with excellent public transport accessibility (6b). The London Plan actively encourages "significant levels of mixed use development" within such locations including town centre uses such as retail or leisure, with emphasis on development optimisation. The London Plan is clear that given the significant "step change" in capacity and connectivity offered by Crossrail 2, this will transform Wimbledon into a major transport hub. In turn, it states that there is "opportunity to plan for significant growth and intensification, with residential and commercial development." It is therefore considered that the commitment should be towards encouraging "high and higher densities" in order to fully utilise the unique development opportunity within these town centre locations. This approach will significantly enhance their vitality and viability in accordance with the NPPF and London Plan guidelines. Therefore densification and intensification of new development should be actively embraced and hence the reference required to "high densities" also. Optimisation of sites encourages innovative design and high quality, place making and this should be actively promoted within the new local plan. <u>Policy Recommendation</u> The above policy wording change should therefore be read as follows: "In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect high or higher densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough's acute housing needs."	No change proposed. The existing statement already supports densities towards the higher end across the four neighbourhoods while referencing setting, character, open spaces, PTAL and heritage assets as guiding densities. This is effective and proportionate.

15	F&C Property holdings	02 Climate Change			BMO supports the promotion of environmentally sustainable design as an overarching principle for new development. It is noted that the draft Local Plan outlines the intention to set requirements beyond London Plan 2021 requirements via Policies CC2.2, CC2.3 and CC2.4. The result of meeting more stringent targets will be increased development build costs. Such additional development costs should be explicitly recognised within policy as having a direct impact on viability. The increase of a carbon offset payment from £95 per tonne (set out in the London Plan) to a minimum of £300 per tonne would also have impact on scheme viability, and the justification for this is inadequate as it does not recognise physical site constraints which can also restrict the ability of a site to deliver net zero carbon i.e. limitations in roof space including having regard to competing planning considerations such as plant associated with air source heat pumps or the delivery of amenity roof gardens. The Council should robustly test the additional costs through their viability evidence base for the draft Local Plan to ensure that the additional costs arising do not render development unviable such that this could impact the delivery of development to include those of strategic significance with other significant regeneration and other planning benefits.	The proposed minimum on-site target of 50% and cost of carbon of £300/tCO2 are based on recommendations from a study commissioned by several London boroughs in 2019/2020 (https://www.haringey.gov.uk/sites/haringeygovuk/files/202005-towards-net-zero-carbon-report-revm.pdf). This study found that the London Plan on-site carbon reduction targets and cost of carbon are inadequate for delivering the savings required to achieve net-zero carbon. The study demonstrated that, using more up to date carbon emissions factors than those used in Building Regulations 2013 (SAP 10 and SAP 10.1), with an efficient low carbon heating system (e.g. a heat pump) and reasonable levels of fabric and ventilation performance, new build residential and non-residential developments can and should achieve at least a 60% and 50% improvement against Building Regulations 2013 respectively. The decarbonisation of the electricity grid means that, for the same specifications, a greater improvement over Part L is achieved with no extra effort/ cost. The study also found that it would cost a local authority at least £300/t to offset carbon in a sustainable way, taking into account administration and management costs. Using the current cost of carbon recommended in the London Plan (£95/t), local authorities therefore have insufficient funds through the cash-in-lieu contributions to deliver equivalent carbon savings off-site to offset the carbon shortfall from a development. At £95/t, it is cheaper and easier for developers to offset carbon emissions via cash-in-lieu contributions than it is to achieve the actual savings on site, resulting in developments with higher operational emissions, and a carbon shortfall which cannot be offset. The proposed onsite targets and cost of carbon are required to maximise carbon savings on site in order to future-proof development and minimise the need for expensive retrofit, to achieve our national and local carbon reduction commitments. The policy includes a provision that if the developer can't meet the requirement if it is unviable, we will consider this on a case by case basis on the submission of a viability assessment given the range of commercial developments in Merton.
15	F&C Property Holdings	09 Wimbledon	Wi11		These representations have been prepared by Savills on behalf of our clients, F&C Property Holdings Limited (as advised by BMO Real Estate Partners and Stanhope Plc). BMO is the asset manager (with Stanhope as the development consultant) for F&C Commercial Property Holdings Ltd who are the owners of Site Wi11 known as Victoria Crescent/Piazza, 39-59 The Broadway, 1-11 Victoria Crescent/Piazza, Wimbledon. The owners are long-term and major investors in Wimbledon Town Centre having funded, managed and invested in the Victoria Crescent/Piazza since it was first developed by F&C Commercial Property Holdings Ltd's predecessor in title. They have a long term commitment to the future vitality and viability of Wimbledon Town Centre and continue to be in consultation with LBM Officers on future aspirations for the Site. Victoria Crescent/Piazza is a mixed use, retail and leisure scheme with a site area of approximately 1 hectare in the heart of Wimbledon town centre within designated core shopping frontage. It is divided into two main buildings, laid out in a crescent shape with a piazza fronting the Broadway and with a pedestrian walkway running from the Broadway through to Hartfield Road. Victoria Crescent/Piazza is strategically situated in close proximity to the station as one of the largest single ownership sites with a significant retail/leisure offer in the Town Centre. It has excellent public transport accessibility with a PTAL rating of 6B. The piazza is unique in presenting a large public open space which provides a sense of place within this central part of the Town Centre. It is allocated for redevelopment (in the form of town centre uses) within LBM's Stage 3 (Regulation 19) Pre Submission Consultation Plan (Site Wi11). It is therefore one of the most strategically important sites in Wimbledon Town Centre. Victoria Crescent/Piazza adjoins the Hartfield Road surface car park (0.45 hectares) owned by LBM (draft site allocation Wi5). Discussions have been held between BMO/ Stanhope and LBM exploring the potential for complementary regeneration incorporating both ownerships. BMO's objective is to enhance and develop Victoria Crescent/Piazza as a key part of the current and future plans for Wimbledon Town Centre's transformation, and these representations have been prepared on this basis.	Noted
15	F&C Property Holdings	09 Wimbledon			In order to be found sound at LBM's forthcoming Local Plan Examination in Public, the policies in the draft Local Plan need to comply with the tests of soundness set out in NPPF35 (July 2021). The plan must be: "a) Positively prepared – <u>providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs</u> and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, <u>taking into account the reasonable alternatives</u> and based on proportionate evidence; c) Effective – <u>deliverable over the plan period</u> and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred as evidenced by the statement of common ground; and d) Consistent with national policy – <u>enabling the delivery of sustainable development</u> in accordance with the policies in this Framework." (author's emphasis underlined).	Noted
15	F&C Property Holdings	09 Wimbledon			NPPF8 defines sustainable development in the form of achieving economic, social and environmental objectives, in that sequential order - with economic objectives being of the priority in creating a "strong, responsive and competitive economy." LBM's new local plan is required to be prepared in general conformity with the new London Plan (2021). In particular, the new London Plan encourages more tall buildings to meet the future development needs of London, and on that basis new density of development will need to be optimised at these suitable and appropriate locations. In some areas, especially town centres enjoying good public transport connections, tall and taller buildings will need to be built. The NPPF guidelines and newly adopted London Plan policy on tall buildings are considered in detail as part of these formal representations when addressing the tall buildings approach under LBM's new tall buildings policy (D12.6) and in the context of Wi11 site allocation.	Noted
15	F&C Property Holdings	09 Wimbledon	Wi11		BMO welcomes and supports the continued allocation of Victoria Crescent (Wi11) for redevelopment. However, the representations provide for re-wording and certain changes to the draft allocation to ensure consistency with other parts of the pre-submission local plan and the London Plan. Such changes are made to ensure effective and positive policy more generally in the context of the NPPF's tests of soundness. Policy recommendations are found at the end of each policy sub-section with strikethrough text representing deletion and bold as additional text	noted
15	F&C Property Holdings	09 Wimbledon	N9.1		The overall vision is acknowledged (see separate comments on draft climate change policy) for the borough including that by 2036 the Council will have created attractive, safe and secure 20 minute neighbourhoods to live, work and socialise. In order to achieve this objective it is important that a vibrant mix of uses is encouraged within town centres at optimal density (subject to impacts) in order to ensure that this vision is achievable, viable and deliverable (see also formal comments on draft allocation Wi11 below which form part of these formal representations)	No change requested
15	F&C Property Holdings	09 Wimbledon	N9.1		BMO support Wimbledon Policy N9.1 and in particular the following commitments: "a. Promoting Wimbledon as south west London's <u>premier location</u> for business, leisure, living and culture: an exemplar for good quality and sustainable place-making. b. Driving investment and innovation in workspaces to support the local economy and jobs in the town centre commensurate with <u>Wimbledon's role as a Major Centre</u> . Encourage development that attracts residents businesses, visitors and tourism to the area all year round, including high quality hotels, conference facilities and cultural activities. f. <u>Strengthening the position of Wimbledon as a Major Centre in south London through the redevelopment of key sites within the centre</u> (author's emphasis underlined). It is important that these aspects of this important growth related policy are reflected within Site Allocation Wi11 to ensure that the objectives set out can be delivered. This will ensure that the policies in the plan are effective, positively drafted and meet the NPPF soundness tests	No further change proposed. Plans should be read as a whole. There is no need to duplicate statements in a town centre neighbourhood policy (such as Wimbledon N9.1) within each site allocation within that town centre or neighbourhood unless the statements relate specifically and only to the site allocation concerned.

15	F&C Property Holdings	09 Wimbledon	Wi11	<p>The draft allocation (at site allocation sub-section), identifies: <i>"A mix of uses including retail, pub or drinking establishment, financial and professional services, assembly and leisure, hotel with the re-provision of public realm. The priority for the site should be town centre uses. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability."</i> BMO actively supports the allocation of Victoria Crescent (Site Wi11) for comprehensive redevelopment and acknowledges the recognition within the draft allocation that this is a prominent town centre site. More detailed comments are provided below in relation to certain parts of the draft Wi11 allocation with recommended policy change.</p> <p>i. Mix of uses ("site allocation" sub-section) The draft allocation states that the priority for the site should be town centre uses. Main town centre uses are defined in the NPPF 2021 Glossary (page 68) as: "Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, <u>restaurants</u>, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls, <u>offices</u>; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)" Both the London Plan and the Pre-submission Local Plan (at paragraph 9.1.20) recognise Wimbledon Town Centre as an ideal location for new office investment and development. This needs to be accurately reflected within the Wi11 allocation to ensure <u>offices</u> are described within the wider description of allocated town centre uses. Post-pandemic, draft policy land use allocations need to be as flexible and inclusive as possible in order to be adaptable and responsive to market demand change. Further, on a very similar basis, <u>restaurants and cafés</u>, as important defined town centre uses should also be explicitly referenced within this section of the draft Wi11 allocation. There is high demand for these uses at this part of Wimbledon which will only contribute further to the vibrancy of strategic, mixed use development at this location with much improved public realm through the regeneration. Both such uses identified will, in turn, ensure lasting vitality and viability for the town centre, now and for the future. This policy change will therefore ensure consistency and conformity with the NPPF and London Plan and leave no ambiguity at the time of a later planning application. Wi11 currently restricts residential to upper floors on the Hartfield Road frontage, stating "there may be some scope for residential on upper floors facing Hartfield Road where this improves viability." This restrictive approach is not justified in the absence of any planning policy, design feasibility or market demand justification. Residential on the upper floors, to support viability of the overall scheme, would be entirely appropriate and in line with LBM's "Good Growth Strategy" objectives which encourages residential within highly accessible town centre locations and which the NPPF and London Plan actively promotes also. New residential uses incorporated into a wider mixed use, town centre regeneration proposal would be subject to high quality design and accommodation and could be applied across all parts of the site including the Broadway frontage. Delivering high quality residential accommodation is a key part of creating 20 minute neighbourhoods in which to live, work and socialise, which is one of the main objectives set out in the Council's vision for the borough within Chapter 01C (Urban Development Objectives and Vision). The London Plan actively encourages high density, residential development at well-connected, town</p>	Considered in proposed policy amends below
15	F&C Property Holdings	09 Wimbledon	Wi11	<p>Policy Recommendation (Wi11: site allocation sub-section): A mix of town centre uses including retail, pub or drinking establishment, cafés and restaurants, financial and professional services, assembly and leisure, hotel and offices with the re-provision of public realm. The priority for the site should be town centre uses (in line with definition in the NPPF). There is also opportunity for may be some scope for residential uses of a range of mix and tenure type to improve vibrancy and viability and positively add to the place making regeneration of this strategically important town centre site on upper floors facing Hartfield Road where this improves viability.</p>	<p>Site allocation: A mix of Town Centre Type uses including retail, cafes and restaurants pub or drinking establishment, financial and professional services, assembly and leisure, hotels and offices with the re-provision of public realm. The priority for the site should be town centre type uses. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.</p> <p>No further change aligning the town centre type uses with the NPPF definition. the NPPF definition includes drive through restaurants which would not be appropriate for this site due to the increased traffic it would bring to the town centre given its excellent public transport access</p> <p>Noted. Please see the London Plan 2021 and the GLA's representation to Regulation 19 on Merton's Local Plan regarding tall buildings. Proposed amendments considered below</p>
15	F&C Property Holdings	09 Wimbledon	Wi11	<p>ii. Tall Buildings ("design and accessibility guidance" subsection and summary of "site location") In the first instance, pre-submission policy D12.6 identifies "tall" buildings being appropriate for designated Town Centres to include Wimbledon. D12.6 defines tall buildings in the borough as relating to those of a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey (in accordance with adopted Policy D9 of the London Plan). The adopted Future Wimbledon SPD (2020) identifies potential for "up to" 8 storeys on the majority of the Wi11 Site and also potential of "up to" 10 storeys within the south eastern area of it. Therefore, taken simply in terms of tall building definition, the reference within draft Wi11 allocation - should be to "tall" building not "taller" building in compliance with D12.6 (sub-section (p), in particular) and London Plan D9. Further, D12.6 in defining Wimbledon Town Centre as a location suitable for "tall" buildings by definition, indicates that "tall buildings must be appropriately sized and located and will be appraised case by case." It further states that "in the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and a sense of place." The SPD itself recognises at paragraph 5.3.54 that "applicants will need to justify height in line with other relevant local and Mayoral policies" implying that the detailed impact testing (for example, heritage impact, townscape and views and sunlight and daylight) have not been undertaken in identifying indicative heights for sites within the SPD document. Such detailed design and technical impact assessments will clearly need to be undertaken in support of future application proposals. Further, paragraph 5.3.60 states that "the building height guidance should not be taken as writ, but be used to inform what level of uplift in height may be considered appropriate for the context of each site. Building height guidance must be considered alongside architectural quality, mix, contribution to public realm, neighbouring context, sustainability and other relevant policies." It is further stated at paragraph 5.3.61 that identified building height should not be "over-prescriptive in this guidance document." That is entirely correct given that no detailed design feasibility has been undertaken to support the "building height guidance map" (at page 51 of the SPD); it is only through detailed design and impact assessments to support future application proposals will the exact height and density be determined with appropriate design mitigations and enhancements in place. This is recognised within the SPD itself. Therefore, the reference to future application proposals at Wi11 being "in line" with the Future Wimbledon SPD, must be removed to ensure consistency with draft D12.6, London Plan D9 and the SPD itself. BMO submitted previous representations to the SPD at the time of its consultation identifying Wi11 as having clear potential for much taller buildings (than that indicatively identified within the draft document) with the suggestion of a "tall buildings cluster" around the station to include Wi11 (see also recommended policy recommendation to Policy D12.6 in relation to an identified "tall buildings cluster"). The SPD has not been subject to an examination (as this new plan will be) and it has been subject to objection particularly in relation to the tall buildings approach. These factors need to be accounted for in attaching weight to it as a material planning consideration when future planning applications are determined. Naturally, LBM will consider it as a backdrop to future planning application proposals and apply a certain weight to it and therefore it is not considered necessary to incorporate within site allocation references, and in particular Wi11. It is therefore recommended that all references to the SPD within Wi11 are removed on the above basis. Applying references which indicate that proposals are required to accord with SPD guidance would present a situation where storey heights would be unduly restricted (based on no evidential justification). It is only at the time of an application scheme when impact assessments which underpin it are undertaken, will appropriate density and height (alongside other core design</p>	<p>No further change proposed. The London Plan 2021 and the GLA's representations to Merton's Local Plan at Regulation 19 stage make it clear that locations for taller buildings should be informed by robust analysis and should be specifically identified. The FutureWimbledon SPD, including the building heights it proposes, is based on a robust and thorough analysis, including of heritage assets, topography, land uses, Wimbledon's role as a major centre and other factors. It has been informed by two rounds of public consultation before being adopted in December 2020. This Local Plan proposes Wimbledon as suitable for taller buildings and in accordance with the London Plan 2021 and the GLA's representations on general conformity, the FutureWimbledon SPD provides the most appropriate justification for building heights in this location.</p>
15	F&C Property Holdings	09 Wimbledon	Wi11	<p>Recommended Policy Change Design and Accessibility Guidance "Development proposals must should aim to demonstrate optimisation through an innovative, design-led approach in creating high quality regeneration of the site. The Future Wimbledon SPD should be a benchmark for minimum height and density considerations (acknowledging part of the site is already identified for up to 10 storeys) and with the scheme application itself (robustly supported by design and technical impact assessments) dictating exact parameters."</p> <p>The Site Location/ Approach to Tall Buildings Development of the site should include taller buildings subject to consideration of impacts on existing character and townscape and in the context of optimisation and high quality, place-making design." and in line with the height parameters set out in the Future Wimbledon SPD</p>	<p>No further change proposed. The "site deliverability" section is intended to give some certainty to residents, businesses, neighbouring landowners, infrastructure providers and others using Merton's Local Plan as to when a site might come forward. Site allocations may come forward prior to or after the dates indicated, although it would be helpful if the representor promoting the site could give as accurate a f-year period as reasonably possible to enable others using the Local Plan Given this comex town centre site has multiple existing tenants and occupiers that would need to move out, has not had pre-application consultation events with members of the public to inform any future major planning applications, and that any demolition and construction on this site will be complex due to its tight, town centre location, on the existing information available officers consider that final delivery within 5-10 years is currently the most reasonable scenario. We welcome dialogue with the landowner to bring it forward earlier if they wish.</p>
15	F&C Property Holdings	09 Wimbledon	Wi5	<p>The same formal comments (see Wi11 above) are applied in relation to Wi5 draft allocation concerning: referencing of "tall" building potential; consistency in range of town centres uses allocated as per Wi11 proposed changes; early site delivery; and matters relating to SPD referencin</p>	<p>No further changes proposed to site Wi5 for the reasons referred to in our responses to Site Wi11</p>

15	F&C Property Holdings	12 Design	D12.6		BMO actively supports draft D12.6 in terms of defining "tall buildings" within designated Town Centres to include Wimbledon Centre. As expressed in recommended policy wording change to allocation Wi11 (within BMO's wider representations), this tall building definition should be translated to strategically important town centre sites such as the Victoria Crescent site. London Plan Policy D9 indicates that London boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the plan. This process should involve a consideration of the areas identified for growth. The spatial strategy for the borough, as outlined in early chapters of the Pre-submission Local Plan, identifies Wimbledon as one of the key growth areas in the borough, in creating significant levels of new development both pre and post Crossrail 2 through developmental "step change." Draft D12.6 identifies where the Council will generally support tall buildings and cites Wimbledon Town Centre, as below, at subsections (p), (s) and (t). " We will generally support tall buildings where: p. They're within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document." The pre-submission policy goes on to state that: "Development proposals for tall buildings should be supported by: s. A detailed townscape analysis that includes short, mid and long views and analysis of its impact on the setting of heritage assets such as parks or buildings t. A digital 3D model in agreement with the council that can be used to evaluate its visual impact across the borough and beyond." As set out above (under comments provided under Site Allocation Wi11), the draft local plan as currently drafted creates ambiguity around the approach to tall buildings in Wimbledon Town Centre. There are numerous draft policy references across the plan actively promoting significant redevelopment at Wimbledon, however continued reference also to the SPD to include at D12.6, under subsection (p). When read plainly, sub-section (p) identifies the potential for tall buildings within Wimbledon Town Centre with such heights (6 storeys or 18 metres and above) also identified within the SPD. However it needs to be clear that the SPD should not be used to prescribe development parameters to include height at key sites such as Wi11 given the lack of evidential justification to support indicative height references within it which the document itself recognises. The SPD has not been subject to an examination, there has been a level of objection to it on the tall building matters to include BMO's earlier representations in relation to Wi11, and the SPD itself recognizes it is not a prescriptive set of guidelines where application proposals will dictate appropriate height and density based on detailed assessments. Design mitigation and enhancement to address any such impacts will be integral to the proposals in moving forward and in particular deal with matters identified in subsection (s) and (t) in terms of heritage, townscape and visual impact. It is therefore questioned why sub-section (p) gives reference to the SPD given it will become a material consideration in the normal way at the time of an application being determined. It is therefore recommended that this sub-section removes such reference given also other design related criteria set out in D12.6 (and other criteria based, design-related policies elsewhere in the draft plan) which provides the Council further assurances that such particular impacts will be dealt with in terms of tall buildings and their design. At the application stage, of course, such proposals will need to achieve London Plan D9 tall buildings design criteria also. Demonstration of how impact assessments (in particular townscape impact and views analysis) can support tall building proposals even if they sit outside defined tall building locations is apparent from a recent appeal decision in New Malden (appeal reference: APP/T5720/W/20/3250440 dated 29 June 2021). In order to ensure policy is positive and effective in supporting regeneration of important strategic sites in highly accessible Town Centre locations such as Wimbledon, it is recommended that the policy wordings are changed as set out below.	Proposed amendments considered below
15	F&C Property Holdings	12 Design	D12.6		Policy Recommendation It is recommended that within D12.6 (at criterion (p)) reference to the Future Wimbledon SPD should be removed for all the reasons set out above and to ensure consistency with other pre submission growth policies for Wimbledon as a town centre. In order to ensure that the policies are effective and in line with Policy D9 of the London Plan which states that boroughs should determine locations where tall buildings may be an appropriate, LBM should identify defined "tall buildings cluster" within Wimbledon Town Centre of new building heights of up to 10 storeys and higher, subject to impact assessments. This designated cluster should include the Wi11 allocation which is already designated for up to 10 storeys within the southern western part and is entirely appropriate for such heights and potentially higher, subject to high quality design and impact testing. It is therefore recommended that sub section (p) is subject to the following change: "We will generally support tall buildings where: p. They're within Wimbledon town centre as a location appropriate for tall buildings more generally with a strong presumption in favour of tall, dense buildings within the identified tall buildings cluster around the station. " as set out in the Future Wimbledon supplementary planning document. The "tall buildings cluster", to include Wi11, could be identified on the summary site allocations plan within Chapter 9 or on the presubmission proposals map, for the Local Authority to determine	Officers have reviewed and disagree that the SPD references should be removed. The Future Wimbledon SPD provides informed design guidance for future development in Wimbledon town centre, and as such provides additional information that should inform any future development in the Town Centre, therefore signposting to this document is relevant. No changes recommended.
16	Friends of Wimbledon Town Centre	09 Wimbledon	Objectives	page 264	Page 264: The three overarching objectives are correct and appropriate	Noted.
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 265-266	Page 265-266: We regret that a character study specifically of Wimbledon Town Centre has not been undertaken	Noted. Wimbledon town centre is covered by Merton's Borough Character Study SPD 2021; the Future Wimbledon SPD 2020 and conservation area character appraisals where relevant. The council does not consider that a further character study is required.
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 267 and following	Pages 267 and following: The activities listed (a to q) are admirable, but extremely vague. How will the council know whether or when success has been achieved in these policy areas?	The authority monitoring report conducts a shopping survey, usually annually, which helps monitor town centres and existing planning policies and informs future policy production. In addition other monitoring activities as set out in the sustainability appraisal will help ensure the plan is delivered.
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 267d	Page 267 (d) "Supporting high quality architecture and design..." This is welcome, but the lack of detail means that it is unclear how the policy is to be implemented if the vision realised.	No further change proposed. The full list of (d) states "supporting high quality architecture and design with traditional urban blocks with active frontages" which, when read as a whole, is clearer about what is expected. High quality architecture and design can be based on the policies in Chapter 12 Places and Spaces in a growing borough, and on adopted guidance (e.g. relevant conservation area character appraisals, depending on the site's location; the Future Wimbledon SPD; the borough character study). At the planning application stage Merton's Design Review Panel will comment on major development proposals to help improve design
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 267h	Page 267 (e) is ambiguous. "Respecting views from Wimbledon Hill through the town centre and beyond, with taller developments set away from the historic core, located around the station, St George's Road, Hartfield Road and Broadway East." Is it the historic core which is located around the station or the taller developments? More explanation is needed for this sentence to be comprehensible	Additional modification proposed: for clarity: Respecting views from Wimbledon Hill through the town centre and beyond, with taller developments set at St George's Road, Hartfield Road and Broadway East, away from the historic core located around the station
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 268h	Page 268 (h) It would be helpful to mention here Wimbledon's need for a new cultural/arts/community centre in the town centre.	No further change proposed. Various town centre sites, including Wi5 (Hartfield Road Car Park) and Wi11 (Victoria Crescent) and Wi2 (Broadway car park) support community, cultural, assembly and leisure as part of the allocations. There is no specifically identified need for additional facilities
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 286	Page 268 Please add to "Surrounding neighbourhoods of Wimbledon" explicit acknowledgement of the residential character of residential streets in Trinity, Abbey, Hillside and Dunderdonal Wards, which are immediately adjacent to the commercial centre, and express a commitment to preserving the quality of residential community life by avoiding intrusive development.	No further change proposed - protection of the surrounding residential amenity of Wimbledon is already part of the policy and its supporting text.
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 271, 9.1.7	"We encourage dense mid-rise urban blocks..." What exactly is meant by "mid-rise"? We continue to regard this as an imprecise term and would prefer an explicit maximum building height of 22 metres	a Main Modification has been recommended to Policy N.91 Wimbledon which clarifies that a taller building is defined as greater than 21 metres and that building heights in Wimbledon are in reference to the Future Wimbledon SPD. Extensive design and architectural guidance can be found in the Future Wimbledon SPD
16	Friends of Wimbledon Town Centre	09 Wimbledon	N9.1	Page 275, 9.1.31	Page 275, 9.1.31 This statement is welcome but, again, more detail is needed on how such protection will be achieved.	No further change proposed. Paragraph 9.1.31 states that surrounding residential amenity will be protected by focussing town centre activity within the town centre boundaries
16	Friends of Wimbledon Town Centre	09 Wimbledon	Wi2	Page 281	Site Wi12 Broadway car park Page 281 states "Development of the site could include taller buildings". As mentioned above, this is imprecise. We would prefer a specific maximum height of 22 metres. This comment applies to many of the other sites listed in this sector	a Main Modification has been recommended to Policy N.91 Wimbledon which clarifies that a taller building is defined as greater than 21 metres which addresses this representation
16	Friends of Wimbledon Town Centre	09 Wimbledon	Wi5		Site Wi5 Hartfield Road car park. As mentioned above, there is no reference to 'cultural' or 'concert hall' or 'arts centre', only to 'leisure'. A firm commitment to a cultural/arts/community centre on this site would be welcome.	No further change proposed. Sites Wi5 (Hartfield Road car park) Wi11 (Victoria Crescent and Wi2 (car park adjacent New Wimbledon Theatre) have allocations that include community, cultural, assembly and leisure. This could include a range of different types of developments, including a concert hall or arts centre.
17	GLA	11 Housing	H11.2	11.2.9	The draft Plan could be clearer on what actions Merton would take in the event of under deliver	Noted and agreed. Suggested additional wording added to paragraph 11.2.9 to address response.
17	GLA	11 Housing	H11.1		The draft Plan could make it clearer that in order to follow the Fast Track Route, planning applications for new homes must meet the borough's tenure split requirements too.	Noted and agreed. Suggested additional wording added to Policy H11.1 (bullet point F table) to address response
17	GLA	11 Housing	H11.2	11.2.8	Merton should make it explicitly clear whether or not the small sites target has been rolled forward beyond 2029	Noted and agreed. Suggested additional wording added to paragraph 11.2.8 to address response

17	GLA	11 Housing	H11.2	11.2.4	Additional housing that could be delivered as a result of any committed infrastructure improvements should also be included in the target beyond 2029.	<p>Noted. Further minor changes proposed. Additional wording to be added to para.11.2.4 and new additional paras to be added after para 11.2.4 to address the GLA response by clarifying Merton's position concerning additional housing delivery beyond 2029.</p> <p>London Plan paragraph 4.1.11 states that: if a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.</p> <p>Merton supports high quality development which meets identified needs. Merton faces constrained supply as it is characterised by a very large number of small sites and green spaces. These characteristics are replicated in several of the surrounding and adjacent boroughs.</p> <p>The SHLAA 2017 findings indicates that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2035/36 increases to 548 homes per annum.</p> <p>Merton can confirm that there are no committed transport infrastructure improvements which can be considered to provide additional capacity for new homes beyond 2028/2029 as per Merton's Infrastructure Needs Assessment 2021 and Transport for London's representations on Merton's Local Plan. Merton will continue to work proactively and collaboratively with the Mayor in contributing to addressing much needed additional homes for London.</p>
17	GLA	Policies Map	Policies Map		<p>Metropolitan Open Land (MOL)</p> <p>Merton's Designated Site Boundary Review Technical Report (2020) proposes a number of MOL, Sites of Importance for Nature Conservation (SINCs) and other boundary changes. Any proposed or likely MOL boundary changes should be clearly reflected in maps. As the Mayor affords MOL the same status and level of protection as Green Belt, Policy G2B is applicable in addition to the tests set out in the NPPF, in which case the council will need to establish that exceptional circumstances are fully evidenced and justified to support any proposed alterations to MOL boundaries.</p>	Noted. All changes to the Policies Maps, including MOL have been consulted on through the Local Plan process in both map and text format and exceptional circumstances have been set out where required for any MOL changes.
18	Goldcrest Land				<p>These submissions relate the absence of a site specific allocation on the draft policies map, in respect our clients land at Dawlish Avenue. The site to the north at Rufus Business Park forms a site allocation – W17 on the draft Wimbledon Policies Map. Our clients site is located between the above site, the railway line and the adjoining Recreation Ground, all as shown on the map extract below. It is currently the subject of two appeals, one for a wholly residential use and the other for a mixed use. No land use objection has been raised to either proposal in the refusal reasons. The only issue is access, that does not in itself preclude the proposed allocation. Therefore in our view the site is suitable for residential development for 23 residential units. It should therefore be allocated as such in the emerging draft plan. The extent of the site is shown on the extract below for clarity. [see original response for map] Include the site to the rear of Dawlish Avenue as a residential site allocation for 23 units.</p>	No change proposed. The site in question has been the subject of two recent planning application for 16 homes and 23 homes respectively (references 20/P1665 and 20/P1675) , a summary of the reasons for refusal including relating to failing to provide safe access for pedestrians, vehicles and cyclists due to the restricted accessway. The site is now being considered as part of the appeals process.
19	Historic England				<p>Our comments on the Regulation 19 pre-submission stage draft Local Plan (i.e. stage 2a consultation) largely have not been addressed in the current Publication version and our representations, therefore, must be reiterated, and I attach our earlier letter as a formal statement of our position at this stage. Most of the comments are matters of detail and were provided in an advisory capacity to guide the plan towards being a more 'heritage sensitive' framework.</p> <p>We welcome, nonetheless, the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met.</p>	Noted
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		<p>These representations are submitted in response to the London Borough of Merton (LBM) Stage 3 Draft Local Plan (LP) consultation on behalf of Hoo Hing Ltd and Elbrook Cash & Carry Ltd. Representations were also submitted at Stage 2a.</p> <p>1.2 The Site at Bond Road, Mitcham ('the Site') is owned by our clients, it is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The Site amounts to some 1.3 ha. A Site Location Plan is attached at Appendix 1.</p> <p>1.3 Our clients wish to promote their land interest through the emerging LP for a residential site allocation for the reasons set out in this report. This Report firstly provides some background to the Site and its suitability for residential use. Following this, we assess the Draft Local Plan and provide our detailed response to the consultation and the need to allocate further sites for residential in order to meet housing need. To confirm our clients wish to appear at the Examination.</p> <p>1.4 To confirm, these representations relate to the following policies:</p> <ul style="list-style-type: none"> • Policy N4.1 Mitcham (with supporting paragraphs 4.1.1 – 4.1.16). • Allocations (within Chapter 4). • Policy H11.2 Housing Provision (with supporting paragraphs 11.2.1 – 11.2.22). • Strategic Policy EC13.1 Promoting economic growth and successful high streets • Policy EC13.3 Protection of scattered employment sites (with supporting paragraphs 13.3.1 – 13.3.10). 	No change proposed. The first representation on this site was received in February 2021, at the end of the second round of Regulation 18 consultation (known as Stage 2a). By this time more than nine months of public consultation had taken place on Merton's Local Plan: the "call for sites" (2017-18); the first Reg18 (Stage2) at which further new sites were proposed and the second Reg18 (Stage 2a). The late submission did not allow for any further time in the Local Plan process to consult on further new site allocations prior to Regulation 19 and therefore this site was not taken forward into the Local Plan as a site allocation. However we welcome dialogue to bring the site forward which can be done via the pre-app and planning applications process. Many of the issues raised in this representation (transport, public realm improvements, building design, energy, deliveries and servicing etc) are more appropriate for the planning application stage and can be more swiftly managed there; this can be done in parallel to continued engagement with the Local Plan. Regarding land use principles, due to the characteristics of Mitcham, (as identified both in adopted or emerging planning policy) we would have concerns over the loss of jobs and businesses from this site as they provide services to ethnic minorities; there aren't alternative services in the Mitcham, Merton or south London area. We understand that the freeholders are also the business owners and we have approached the representative about exploring this issue further. There may be opportunities for co-location of businesses and jobs and residential.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		<p>2.1 The Site is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The Site amounts to some 1.3 ha. A Site Location Plan is attached at Appendix 1.</p> <p>2.2 The Hoo Hing Cash & Carry is situated adjacent to the Asda supermarket which fronts to Western Road (A236). They both share a vehicular access directly from Bond Road. The Hoo Hing building is located perpendicular to Bond Road and has a large building floorplate with an office and staff ancillary services to upper floors. It has customer car parking to the frontage and is serviced via a loading area to the rear.</p> <p>2.3 The Elbrook Cash & Carry is located to the east and has direct vehicular access from Bond Road, with customer car parking to the front. The main building has a large floorplate and is a building of notable height with ancillary offices to the upper floors to the front section of the building, the rear being given over to the cash and carry to enable products to be stored to the maximum height of the building as one storey. There are further buildings to the rear that store products to replenish the cash and carry. The loading / service area is to the east of the main building.</p> <p>2.4 To the rear of the site along the southern boundary of the site is a further four storey building providing a banqueting hall facilities and restaurant known as Chak89. To the east of this is a further storage building associated with the Elbrook Cash & Carry. Beyond this is a two-storey building providing office accommodation and an industrial kitchen with car parking to the front. These buildings are all accessed /serviced from the main Bond Road vehicular access point. However, there is a further access from the adjacent site to the east.</p> <p>2.5 To the east of the site is the Embon Cash & Carry and further workshop / employment uses. Beyond this is the Bond Primary School. The northern side of Bond Road is primarily residential in character, with what is understood to be a 43 flat sheltered housing scheme of 3 storeys in height (LPA Ref: 11/P1772). Beyond this to the east are two storey terraced residential properties. To the south west is the Sadler Close residential development comprising residential blocks of circa five storeys in height with surface level car parking. The blocks span Sadlers Close and are linked by raised residential links at upper levels. On the opposite side of Western Road is the former Mitcham Gasworks</p> <p>The Site is not within a Conservation Area. The nearest listed building is the Grade I Eagle House fronting London Road. Further, there are no Tree Preservation Orders (TPO's) on the Site. Only a small part of the site falls within an Archaeological Priority Zone. The Site is located in its entirety in Flood Zone 1 on the Environment Agency's online mapping and therefore not at risk of flooding. There is no planning history relevant to redevelopment of the Site for alternative use.</p> <p>2.7 The site is PTAL Level 3. It is located 600m from Mitcham Town Centre. It lies circa 1 mile from Colliers Wood Underground Station providing Northern Line services into central London in 30 minutes. It is 1.3 miles to Mitcham Junction Train Station providing Southern Railway services to Epsom, Sutton, London Victoria and St Albans. Moreover 0.8 miles to the Phipps Bridge Road Tram Station providing services to Wimbledon to the north and Croydon to the east.</p>	Noted
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		<p>3.1 The following section assesses the Site's development potential in the context of the emerging Local Plan and the adopted New London Plan March 2021 (NLP). It relates to the following policies:</p> <ul style="list-style-type: none"> • Policy N4.1 Mitcham (with supporting paragraphs 4.1.1 – 4.1.16). • Allocations (within Chapter 4). 	Noted

20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		3.2 The site is 1.2ha and falls within two landownerships. As such complex land assembly would not be required to bring the Site forward. It is our client's desire to secure an allocation and pursue planning permission. This would allow the early delivery of new homes from 2023/24 onwards. The site is therefore available and deliverable	Noted.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		Lack of Physical and Technical Constraints 3.3 The site is previously developed with limited vegetation, and therefore impact on landscape and biodiversity will be minimal. The Site is not liable to flooding, nor does it sit within close proximity to any heritage assets. The site falls partly within an Archaeological Priority Zone which is not considered to be an impediment to development. 3.4 In terms of access, it is anticipated at this stage that Bond Road would be capable of accommodating acceptable access points for residential development. Further, that a residential scheme could be accommodated in terms of highways capacity, and indeed would be likely to have a significantly reduced impact in terms of a) vehicle movements; and b) residential amenity, compared to the existing uses on the site. This would be assessed and tested further through a planning application. 3.5 The potential technical constraints associated with the former Mitcham Gasworks is considered below	Noted
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		The Role of Mitcham in achieving good growth 3.6 The emerging Local Plan (LP) seeks to respond to the draft New London Plan (NLP) and the importance on achieve good growth. NLP Policy SD1 Opportunity Areas identifies areas with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Rather than see Opportunity Areas in isolation the NLP seeks to identify Growth Corridors to demonstrate linkages between the Opportunity Areas (OAs) to ensure that the full potential of the growth corridors and OAs are realised. 3.7 In this respect Mitcham is situated near the Crossrail 2 Growth Corridor and the Wimbledon / Colliers Wood / South Wimbledon OA which has an indicative capacity of 5,000 new homes. Moreover, the site falls within the Trams Triangle / LondonGatwick-Brighton mainline Growth Corridor which is broadly delineated by Tooting to the North, Croydon to the East and Sutton to the West and identifies Sutton and Croydon as OAs, see extract below: [see original response for map of London Plan 2021 Tram Triangle]	No change requested
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		3.8 We support the importance placed in the emerging LP on creating good growth and that the broad locations of growth being the Wimbledon/Colliers Wood/South Wimbledon OA and Morden Town Centre. Beyond this the LP envisages that development will take place, but not to the same scale. 3.9 The LP identifies that Mitcham experiences problems of deprivation including health, income and housing challenges. We would question whether the LP is sufficiently aspirational in its approach to Mitcham and the areas that fall between Tooting, Croydon, Morden and Colliers Wood and the associated major infrastructure and services investment being directed to these areas. The LP should seek to ensure that this investment and growth achieves maximum benefits and stretch within the Borough. Moreover, the opportunity to achieve growth and regeneration in Mitcham in its own right. 3.10 We note that the Key Diagram defines a broad extent of the area to be covered by the future Opportunity Area Planning Framework and that this includes Mitcham. This is supported and we would welcome engagement on its future preparation and the role of Mitcham. In the interim, in our view the LP needs to be more aspirational in the role Mitcham and the need for development to facilitate the growth and regeneration of these areas. This includes the allocation of further sites within Mitcham to deliver growth and assist in responding to the identified problems of deprivation and housing challenges.	Noted. The council supports growth and investment in Mitcham; most of the Local Plan site allocations are in the Mitcham area for the retention of both business space and provision of new homes.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		Changing Pattern of Development 3.11 The character of the surrounding area has undergone change in recent years as considered below, however there is a need for further improvements. The Draft Merton Borough Character Study, which forms part of the LP evidence base, identifies that the Site falls within the Sadler Close Character Area, which includes the Mitcham Gasworks. The Study identifies it as an 'area requiring enhancement to reinforce identity'. It is the lowest scoring Character Area in Mitcham. The Study notes the lack of relationship between buildings and street edges and the poor architectural quality of retail and industrial buildings. It specifically identifies the need for public realm improvements to Bond Road.	Noted. Merton's borough character study was adopted as a supplementary planning document to Merton's local plan in June 2021.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		3.12 The allocation of the Site for residential use offers the potential to provide improvements to Bond Road and Western Road through public realm improvements, improved street edges and high-quality architectural buildings. Residential use would also be consistent with the existing land use character of the area which includes residential to the north and south of the site. The site is also of a sufficient size to enable an appropriate interface to be achieved with the Cash & Carry on the adjacent site to the east and employment uses / workshops beyond to ensure their continued operation.	Noted. Due to the characteristics of Mitcham, in adopted or emerging planning policy we would have concerns over the loss of jobs and businesses, particularly those that provide services to ethnic minorities; there aren't alternative services in the Mitcham, Merton or south London area. We understand that the freeholders are also the business owners and we have approached you about exploring this issue further and in parallel at both pre-app and Local Plan
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		3.13 The allocation of the Site would also provide an opportunity to contribute to the emerging changing pattern of development through the redevelopment of the Mitcham Gasworks located on the other side of Western Road, opposite Asda. This the subject of an allocation in the emerging Draft Local Plan (Site Mi16) for "Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre)." It is also the subject of an existing allocation in the Adopted Local Plan (Site 75) 3.14 The Mitcham Gasworks was the subject of an outline grant of planning permission dated 28th July 2009 (LPA Ref 06/P0984) secured on appeal for 'the redevelopment of the 3.97ha site for a mix of uses comprising residential (C3) (1.95ha); employment (B1) (1.28ha); Live Work (0.05ha); and public open space (0.65ha)'. From the emerging site allocation, it is understood that the residential element of the permission (Hay Drive) has been built out, however that the employment element to Western Road lapsed in July 2012. The site is being jointly promoted by St William Homes LLP and National Grid Property. 3.15 It is clear that if the entirety of the site is to be redeveloped, a further planning permission will be required. In this respect, whilst the allocation includes residential use, it notes that the potential land uses, and layout are currently constrained by the existing gasholder which, whilst no longer used, has not been officially decommissioned. It is understood that the developers are proposing its formal decommission. However, until such time as this has been completed, development is still limited by the Health and Safety Executive's land use planning method (PADHI).	Noted
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		3.16 Attached at Appendix 2 is Drawing 2081_SK_565B [see original response] Illustrative Layout as cited at para 2 of the Appeal Decision Notice. This drawing shows the PADHI Zones and that residential development was approved to the Outer Zone, with non-residential uses within the Inner Zone and Middle Zone. Having regard to the zones, only a small proportion of the Bond Road Site falls within the Middle Zone. Most of the Site falls where residential was considered acceptable as per the July 2009 Permission, i.e. the Outer Zone and beyond. It is therefore considered that even if the gasworks is not formally decommissioned, that residential development can come forward on the Site and the PADHI considerations can be addressed at application stage through a detailed site layout. However, like the Mitcham Gasworks allocation, the formal decommissioning of the gasholder will open wider possibilities in terms of layout and use to this part of the site. 3.17 The allocation of the Mitcham Gasworks seeks to change the pattern of development and character of the area. The allocation notes the 'excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre'. Moreover, the opportunity to deliver much needed new homes.	No change requested.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		3.18 The allocation of the Bond Road Site is consistent with the existing and emerging character of the area and would offer the opportunity to contribute to these objectives. It also offers an exciting opportunity to deliver substantial new homes within close proximity to the town centre and assist addressing the existing housing problems in Mitcham. It could also make a valuable contribution to addressing the Borough's affordable housing needs.	No change proposed. The first representation on this site was received in February 2021, at the end of the second round of Regulation 18 consultation (known as Stage 2a). By this time more than nine months of public consultation had taken place on Merton's Local Plan: the "call for sites" (2017-18); the first Reg18 (Stage2) at which further new sites were proposed and the second Reg18 (Stage 2a). The late submission did not allow for any further time in the Local Plan process to consult on further new site allocations prior to Regulation 19 and therefore this site was not taken forward into the Local Plan as a site allocation. However we welcome dialogue to bring the site forward which can be done via the pre-app and planning applications process. Many of the issues raised in this representation (transport, public realm improvements, building design, energy, deliveries and servicing etc) are more appropriate for the planning application stage and can be more swiftly managed there; this can be done in parallel to continued engagement with the Local Plan. Regarding land use principles, due to the characteristics of Mitcham, (as identified both in adopted or emerging planning policy) we would have concerns over the loss of jobs and businesses from this site as they provide services to ethnic minorities; there aren't alternative services in the Mitcham, Merton or south London area. We understand that the freeholders are also the business owners and we have approached the representor about exploring this issue further. There may be opportunities for co-location.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		Contribution to Housing Need 3.19 The NLP sets out a need for 9,180 new homes in LBM over the period 2019/20 to 2028/29 (Table 4.1), whilst annual targets have been removed from the London Plan this would equate to 918 units per annum. This represents a notable increase from the London Plan 2016 annual target of 411 dwellings for LBM. The Draft LP Policy No H4.2 sets out an aim to deliver 13,263 additional homes for the period 2020/21-2034/35, this would equate to an annual target of 947 per annum.	no change requested.

20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>3.20 We consider the housing requirement and the housing delivery issues associated with Draft Policy No. 4.2 in Section 4 below. However, by way of summary the NLP target should be a minimum due to the unmet housing need in London but also given the likely review of London Plan housing targets.</p> <p>3.21 We would highlight that with 50% of the Council's historic delivery of housing (based on the 411 target) being achieved by small sites (under 10 units), the increase in housing target will need to be met by allocation of large sites for residential use. In addition, the jump from a target of 411 to 947 units per annum will require a step change in housing delivery in the borough. This also points to the need to allocate further sites to ensure housing supply and achievement of housing targets.</p> <p>3.22 The Bond Road Site represents an opportunity to provide a notable number of homes towards the annual requirement and meet local housing needs including the provision of affordable homes.</p>	<p>No change proposed to policy H11.2. The council's target beyond 2028/29 is in accordance with the methodology set out in the London Plan. The GLA have formally confirmed that the local Plan's approach to housing numbers are consistent and in conformity with the London Plan.</p> <p>See earlier comment on no allocation due to lateness of response and willingness to explore through pre-app. Land use planning issues through either process focus on jobs and business retention locally given specialist markets. There may be co-location opportunities to be explored through design at pre-app. The representation has not provided a range or specific number of homes for this site; however at 1.3ha the site is large enough to enable business retention and homes. The representation has not provided a specific number or range of affordable homes.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>3.23 To assist the preparation, we enclose at Appendix 3 wording for the draft allocation of the Site using the Council's template. This should be added to the sites allocated in Chapter 4 Mitcham.</p>	<p>No change proposed. The first representation on this site was received in February 2021, at the end of the second round of Regulation 18 consultation (known as Stage 2a). By this time more than nine months of public consultation had taken place on Merton's Local Plan: the "call for sites" (2017-18); the first Reg18 (Stage2) at which further new sites were proposed and the second Reg18 (Stage 2a). The late submission did not allow for any further time in the Local Plan process to consult on further new site allocations prior to Regulation 19 and therefore this site was not taken forward into the Local Plan as a site allocation. However we welcome dialogue to bring the site forward which can be done via the pre-app and planning applications process. Many of the issues raised in this representation (transport, public realm improvements, building design, energy, deliveries and servicing etc) are more appropriate for the planning application stage and can be more swiftly managed there; this can be done in parallel to continued engagement with the Local Plan. Regarding land use principles, due to the characteristics of Mitcham, (as identified both in adopted or emerging planning policy) we would have concerns over the loss of jobs and businesses from this site as they provide services to ethnic minorities; there aren't alternative services in the Mitcham, Merton or south London area. We understand that the freeholders are also the business owners and we have approached the representor about exploring this issue further. For example, there may be opportunities for co-location of businesses and jobs and residential.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>4.1 Overall, our clients are broadly supportive of the approach to growth and the importance of meeting housing needs, but question whether the Draft LP provides for a robust and justified housing requirement for the period beyond 2028/29, whether it will achieve that housing target without the allocation of further sites and a review on the approach to employment sites. This section sets out our response to:</p> <ul style="list-style-type: none"> • Policy H11.2 Housing Provision (with supporting paragraphs 11.2.1 – 11.2.22). • Strategic Policy EC13.1 Promoting economic growth and successful high streets • Policy EC13.3 Protection of scattered employment sites (with supporting paragraphs 13.3.1 – 13.3.10) 	<p>no change requested.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>Policy No. H11.2 Housing Provision</p> <p>4.2 The NLP sets out a target of 9,180 new homes in LBM over the period 2019/20 to 2028/29 (Table 4.1), whilst annual targets have been removed from the NLP this would equate to 918 units per annum.</p> <p>4.3 The Draft LP Policy No H11.2 sets out an aim to deliver 11,732 additional homes for the period 2021/22-2035/36, this would equate to an annual target of 782 per annum over the plan period. However, the target changes through the plan period, and housing trajectory, as follows:</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>Dwelling target</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>2021/22 – 2028/29</td> <td>8265 units (1033 dpa)</td> <td>Presumed to be based on the NLP target but updated to reflect supply to date.</td> </tr> <tr> <td>2029/30 – 2033/34</td> <td>2370 units (474 dpa)</td> <td>Stated as being based on the SHLAA 2017.</td> </tr> <tr> <td>2034/36 – 2035/36</td> <td>1096 units (548 dpa)</td> <td>Stated as being based on the SHLAA 2017.</td> </tr> <tr> <td>Total</td> <td>11,731 (782 dpa)</td> <td></td> </tr> </tbody> </table>	Plan period	Dwelling target	Comments	2021/22 – 2028/29	8265 units (1033 dpa)	Presumed to be based on the NLP target but updated to reflect supply to date.	2029/30 – 2033/34	2370 units (474 dpa)	Stated as being based on the SHLAA 2017.	2034/36 – 2035/36	1096 units (548 dpa)	Stated as being based on the SHLAA 2017.	Total	11,731 (782 dpa)		<p>no change requested.</p>
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2021/22 – 2028/29	8265 units (1033 dpa)	Presumed to be based on the NLP target but updated to reflect supply to date.																		
2029/30 – 2033/34	2370 units (474 dpa)	Stated as being based on the SHLAA 2017.																		
2034/36 – 2035/36	1096 units (548 dpa)	Stated as being based on the SHLAA 2017.																		
Total	11,731 (782 dpa)																			
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>4.4 From supporting paragraph 11.2.4 the Council has sought to gradually step up to the NLP target over the 10-year period. It is noted that this approach is supported by the NLP at paragraph 4.1.10: "...The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.</p>	<p>no change requested.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing	H11.2	<p>4.5 Whilst a stepped approach is supported by policy it needs to be accompanied by the actions that the Council will take in the event of under delivery. The measures to be adopted in the event of under delivery are not set out in the Draft Local Plan. This is pertinent as it appears that the Council is already experiencing under delivery. A recently allowed appeal dated 29th June 2021 concluded that the Council did not have a 5-year housing land supply when assessed against the NLP housing target (APP/T5720/W/20/3250440). As further evidence of this, the Merton AMR for 2019/20 shows housing completions at 273 units for 2018/19 and 375 units for 2019/20 which is significantly under the old London Plan target of 411 units</p>	<p>Noted. Additional wording added to supporting paragraph 11.2.18.</p> <p>The council has a five year land supply based on the London Plan 2021 target of 918 homes per year; at the time of the Burlington Road planning appeal hearing in December 2020 the inspector's view was that the council did not have a five year land supply. Submitted with this Local Plan is a housing delivery action plan; Housing Delivery research conducted in 2020 and 2021, a draft housing delivery strategy and other evidence that the council is fully supportive of new homes and has taken action to address the previous under delivery experienced in 2018/19 and 2019/20. This also addresses the London Plan policy requirement of identifying actions the borough will take in the event of under delivery. These actions will not be recorded in the Local Plan as they shouldn't be static but should be capable of being reviewed, risk assessed and updated where required to make them more effective. Therefore they will be included in the Authority Monitoring Report.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing	H11.2	<p>4.6 It is noted that the Council's AMR 2019/20 includes reference to a Housing Delivery Test Action Plan which is stated as setting out the actions the Council can take to increase the rate and number of homes (Para 4.28). This document does not appear in the Council's Local Plan Evidence Base webpage and a search of the Council's website has not identified it.</p>	<p>Noted. This document has been submitted with the Local Plan and has been made available on the council's annual monitoring report webpage https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol20 No further changes proposed. Para 4.10 of the 2019/20 AMR states that the Housing Delivery Test was passed with 107% of housing need delivered and that this means that Merton is not required to produce a Housing Delivery Test Action Plan.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>4.7 In terms of the target beyond the NLP ten-year period which ends 2028/29, the draft Local Plan states that the figures are based on the SHLAA 2017. In this respect, the NLP states the following at para 4.1.12: " If a target is needed beyond the 10 -year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and roll forward the housing capacity assumptions applied in the London Plan for small sites."</p>	<p>noted</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>4.8 In this respect it is not clear what process LBM have taken to establish the housing requirement for this period beyond 2028/29. Moreover, whether this has been agreed with the GLA. Nor how it relates to planned improvements to transport infrastructure. From the GLA's Stage 2a response dated 1 February 2021 this implies that they had not been consulted: "Merton should note that where boroughs require a housing target beyond 2029 the PLP is clear in paragraph 4.1.11 that targets should draw on the 2017 SHLAA findings (which cover the period to 2041) and any local evidence of identified capacity in consultation with the GLA, and should also take account of any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions for small sites."</p>	<p>No change requested. No change proposed. Target beyond 2028/29 is in accordance with the methodology set out in the London Plan. The GLA have formally confirmed that the local Plan's approach to housing numbers are consistent with the London Plan.</p>															
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing		<p>4.9 The approach needs to be clarified as the SHLAA 2017 states at Table 1.1 that Merton has an overall capacity of 13,280 dwellings for the 10-year period to 2028/29. The NLP only set a target of 9,180 dwellings for Merton which equates to 4,100 less than the SHLAA capacity identified. It is odd then for the housing target to 2035/36 being even less than the SHLAA identified capacity for the 10-year period to 2028/29. Added to this the fact that the SHLAA identifies a further capacity for the period 2029/30-2040/41</p>	<p>No change requested. Merton's share of London's new homes is set by the London Plan 2021, policy H1 "increasing housing supply". The justification for this policy summarises how these minimum targets were arrived at. Further information on how London's housing targets (overall and that set for individual London boroughs as a minimum) were arrived at was discussed extensively at the Examination in Public of the London Plan 2021; information on the amendments recommended by this process to all borough's housing targets and the whole of London's housing target between the original SHLAA 2017 and the final London Plan 2021 is available online. https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan</p>															

20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.10 The 2017 London Strategic Housing Market Assessment (SHMA) which forms part of the NLP evidence base concludes that there is a pan London need for an additional 65,900 homes per year between 2016 and 2041 to meet existing and future need, of which 47% would need to be affordable homes and 18% intermediate. The Mayor's Annual Monitoring Report 16 2018/19 March 2021 shows delivery of 44,701 (2016/17); 31,201 (2017/18) and 31,201 homes (2018/19) in the last 3 years, a considerable shortfall against assessed housing needs with 2018/19 being less than half of the actual need.	No change requested. Merton's share of London's new homes is set by the London Plan 2021, policy H1 "increasing housing supply". The justification for this policy summarises how these minimum targets were arrived at. Further information on how London's housing targets (overall and that set for individual London boroughs as a minimum) were arrived at was discussed extensively at the Examination in Public of the London Plan 2021; information on the amendments recommended by this process to all borough's housing targets and the whole of London's housing target between the original SHLAA 2017 and the final London Plan 2021 is available online. https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.11 The NLP targets should therefore be a minimum starting point in the context of the pan London shortfall against targets and resultant unmet housing need. Indeed, at the time of Examination of the NLP, it was widely considered that there was a need for an early review to housing targets. Moreover, the Secretary of State has identified the need for an early review of the NLP against the policies of the then NPPF 2019, further updates have since been published. The Examination was held January – May 2019 and there has been no formal review has commenced.	No change requested. It is agreed that housing targets are a minimum. The new London Plan was published in March 2021. Details on reviews will be published on the GLA website
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.12 In terms of a review against the NPPF Policies, this sets out the assessment Local Plans should undertake to establish housing targets. Paragraph 61 reads: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals." (our emphasis).	No change requested. We agree that housing targets are a minimum. In London, housing markets, housing needs and housing targets are set London wide.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.13 The 'Housing Needs and Economic Assessment' (HNEA) Planning Practice Guidance (PPG) which supports the NPPF states, "Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations" 1 (our emphasis). PPG clarifies the need assessment should be unconstrained and separate from determining a housing requirement.	No change requested
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.14 PPG goes on to state that Standard Method (SM) identifies "identifies a minimum annual housing need figure. It does not produce a housing requirement figure."2 (our emphasis)	No change requested
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing	H11.2		4.15 Under the New Standard Method December 2020, the minimum annual need figure for Merton would be 2,033 units per annum. This is over double the NLP target of 9,180 (918 per annum). Indeed, all London Boroughs see an increase. This points again to the need for the need for an early review of the NLP housing targets and indeed for Draft Policy H11.2 to look forward rather than backwards and have regard to the Standard Method and not simply relying on the NLP target for the period to 2028/29 or indeed seek to reduce the housing target beyond this to 2035/36.	No change proposed. The draft local plan accords with the London Plan. Para 0.0.21 of the London Plan states: The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan. Para 0.0.22 of the London Plan states: The Plan does not meet all of London's identified development needs. Work will need to be undertaken to explore the potential options for meeting this need sustainably in London and beyond. This is a matter for a future Plan, and requires close collaboration with local and strategic authorities and partners. Clear commitment from the Government is essential to support the consideration of these options and the significant strategic infrastructure investment requirements associated with them.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.16 In short there is a need to review the minimum annual housing need in Merton, review land availability and establish the appropriate housing requirement figure and allocate sites / write planning policies to positively achieve that housing requirement and growth. Certainty the SHLAA 2017 indicates that there is a greater capacity for housing growth in the borough compared to the NLP target set. The SHLAA 2017 identifies a 10-year capacity of 13,280 with an annual capacity of 1,328 dwellings. As drafted the policy approach of delaying delivery through a staggered approach to targets and then a very low target beyond 2028/29 is not justified and is likely to exacerbate housing need.	No change proposed. Merton's stepped target is justified and is a minimum. paragraph 4.1.11 of London Plan policy H1 states "If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites." Merton has done this and this is demonstrated in the housing delivery evidence.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.17 In the context of the above we would question whether the growth strategy is sufficiently ambitious to achieve the requirement, whether sufficient number and type of sites are allocated to ensure housing supply and whether the policies are positively prepared or effective in achieving the requirement or the step change in approach that is needed given the historically low levels of housing delivery.	No change proposed. Merton's Local Plan is justified, effective and positively prepared regarding achieving housing growth as is evidenced in the housing chapter and LIST OF DOCS. We also agree that there is scope to consider the representor's site to accommodate new homes, potentially as part of a mixed use scheme and we are happy to continue to work with them towards this.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	13 Economy	EC13.3		4.18 It is noted that in addition to policies protecting Strategic Industrial Land (SiL) and Locally Significant Industrial Sites (LSIS) the draft LP includes Policy EC13.3 relating to what is referred to as 'scattered employment sites.' These are understood to be non-designated sites in employment use, with paragraph 13.3.1 seeking to ensure that a wide range of employment uses are caught by the policy. The policy wording resists loss of such sites to residential uses except where: "i. The site is located in a predominantly residential area, and it can be demonstrated that its operation has had a significant adverse effect on local residential amenity; ii. The size, configuration, access arrangements and other characteristics of the site make it unsuitable and financially unviable for whole-site employment use; and It has been demonstrated to the council's satisfaction that there is no realistic prospect of employment or community use on this site in the future. This may be demonstrated by full and proper marketing of the site at reasonable prices for a period of 18 months (1½ years). If proposals do not meet policy requirements of E13.3 (a) (iii) above, the council will seek measures to mitigate against the loss of employment land. Such measures may include providing employment, as part of a mixed-use scheme on site."	Noted
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	13 Economy	EC13.3		4.19 The above is a repeat of Policy DM E3 of the Adopted Sites and Policies and Policies Map July 2014. The above policy was prepared the context of a historical low housing requirement. It has the effect of restricting residential use and in real terms treats non-designated employment sites as if they were designated employment sites.	Policy EC.13 is not a repeat of the 2014 Local Plan. Policy EC13 requires a marketing period of 18 months compared to three years in the 2014 Local Plan. It is not the case that the above policy restricts residential uses in Merton nor is it true to say that Policy EC13 treats scattered employment sites like designated employment sites (for example Strategic Industrial Locations). Policy EC13 is flexible to allow for a mix of uses on site, to allow for the loss of employment land where this is justified and to allow for land swaps. London Plan and local plan policy does not support residential uses on designated employment sites in any circumstances through the planning process. Policy EC13 does. Policy EC13 is justified in helping the council's planning strategy strike a balance between the need for new homes and the need to retain viable business and employment sites for businesses and jobs to locate in Merton, which are not necessarily all in designated industrial estates or designated town centres.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			4.20 The recent appeal decision has demonstrated that the Council cannot demonstrate a 5-year housing land supply, with the Inspector concluding that Para 11d of the NPPF was engaged with a presumption in favour of a grant of planning permission. Whilst that case did not consider the above policy. We would question whether it is positively prepared and whether the 'carrying over' of this policy will achieve the growth aims of the Local Plan. To achieve the step change in supply, in addition to allocating further sites, the Council needs to critically review policies that restrict housing.	The appeal decision issued in June 2021 related to a hearing held in December 2020. On the basis of the information presented at the hearing in 2020, the inspector concluded that at that time paragraph 11d of the NPPF was engaged. However as demonstrated by DOCUMENT FIVE YEAR SUPPLY, and DOCUMENT HOUSING DELIVERY Merton has a five year land supply and can demonstrate delivery over the plan period.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	13 Economy			4.21 We would also question whether the policy is consistent with the provisions of the NLP. Policy E7 Industrial intensification, co-location and substitution sets the policy position for non-designated industrial sites. It states the following: C Mixed-use or residential development proposals on NonDesignated Industrial Sites should only be supported where: 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or 2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space). Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Parts D2 to D4 below. 4.22 We would question why the Adopted NLP Policy is not sufficient to achieve the Council's aims. The proposed approach will see both policies applied on some sites and serves to add an unnecessary additional layer development management causing confusion and uncertainty. For these reasons the policy is not effective and should be deleted.	No change proposed. Policy EC13 is justified and effective and is in general conformity with the London Plan 2021 (see GLA's Stage 3 / Reg19 representation).

20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			5.1 It is clear that there are exorbitant housing needs London-wide. The Council are unable to demonstrate a 5-year housing land supply based on a recent appeal decision of June 2021. The NLP target (918 per annum) more than doubles the requirement to be met. Indeed, the Standard Method December 2020 identifies a minimum annual need figure for Merton of 2,033 units per annum. Whilst this is not a housing requirement, it does indicate the extent of need that would not be met by the NLP housing target. Moreover, it is also over three times the current target that Council have been used to meeting and preparing and applying planning policies to achieve.	No change proposed. We are able to demonstrate a five year land supply, as demonstrated by DOCUMENT FIVE YEAR LAND SUPPLY. The representor is using out of date information in their statement. Extensive dialogue on the housing targets for London (as a whole and at individual borough levels) has been debated at the examination of the London Plan 2021. We are using the London Plan 2021 policy H1 as the housing target for Merton, which we recognise is a minimum target.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			5.2 There is a need for a step change in housing delivery to meet the housing requirement. This requires a change in approach to the preparation of the LP, a change to the approach and number of site allocations and development management policies. For example, the historic supply that LBM are used to achieving is based on 50% provision on small sites (i.e., 200 units per annum). This supply from small sites is unlikely to be capable of being extrapolated up to reflect the new housing requirement. Indeed, that approach is also unlikely to achieve good growth or ensure that the growth and regeneration potential of the various OAs and growth corridors and their surrounding areas are achieved.	No change proposed. We are able to demonstrate a step change in approach to delivering new homes (despite the pandemic recovery) which is evidenced by the DRAFT HOUSING STRATEGY, DRAFT HOUSING DELIVERY EVIDENCE, 5 YEAR LAND SUPPLY, DISPOSALS STRATEGY, BOROUGH CHARACTER STUDY, SMALL SITES TOOLKIT as well as the policies in this plan.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	11 Housing			5.3 There is a need to allocate further large sites for residential use and to ensure that policies are prepared positively to achieve necessary growth and do not unnecessary duplicate and /or add further details to the those in the NLP. In this respect the Local Plan needs to be more aspirational in terms of the role of Mitcham and its need for growth and regeneration.	No change proposed. The first representation on this site was received in February 2021, at the end of the second round of Regulation 18 consultation (known as Stage 2a). By this time more than nine months of public consultation had taken place on Merton's Local Plan: the "call for sites" (2017-18); the first Reg18 (Stage2) at which further new sites were proposed and the second Reg18 (Stage 2a). The late submission did not allow for any further time in the Local Plan process to consult on further new site allocations prior to Regulation 19 and therefore this site was not taken forward into the Local Plan as a site allocation. However we welcome dialogue to bring the site forward which can be done via the pre-app and planning applications process. Many of the issues raised in this representation (transport, public realm improvements, building design, energy, deliveries and servicing etc) are more appropriate for the planning application stage and can be more swiftly managed there; this can be done in parallel to continued engagement with the Local Plan. Regarding land use principles, due to the characteristics of Mitcham, (as identified both in adopted or emerging planning policy) we would have concerns over the loss of jobs and businesses from this site as they provide services to ethnic minorities; there aren't alternative services in the Mitcham, Merton or south London area. We understand that the freeholders are also the business owners and we have approached the representor about exploring this issue further. For example, there may be opportunities for co-location of businesses and jobs and residential.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	04 Mitcham	N4.1		5.4 The allocation of the Bond Road Site would serve to assist the above. It is available and deliverable and could contribute to housing supply and affordable housing within the first 5 years of the plan period. There are no physical or technical constraints to delivery. The allocation of the Site would also provide an opportunity to contribute to the changing pattern of development coming forward through the redevelopment of the Mitcham Gasworks located on the other side of Western Road, opposite Asda.	No change proposed. The first representation on this site was received in February 2021, at the end of the second round of Regulation 18 consultation (known as Stage 2a). By this time more than nine months of public consultation had taken place on Merton's Local Plan: the "call for sites" (2017-18); the first Reg18 (Stage2) at which further new sites were proposed and the second Reg18 (Stage 2a). The late submission did not allow for any further time in the Local Plan process to consult on further new site allocations prior to Regulation 19 and therefore this site was not taken forward into the Local Plan as a site allocation. However we welcome dialogue to bring the site forward which can be done via the pre-app and planning applications process. Many of the issues raised in this representation (transport, public realm improvements, building design, energy, deliveries and servicing etc) are more appropriate for the planning application stage and can be more swiftly managed there; this can be done in parallel to continued engagement with the Local Plan. Regarding land use principles, due to the characteristics of Mitcham, (as identified both in adopted or emerging planning policy) we would have concerns over the loss of jobs and businesses from this site as they provide services to ethnic minorities; there aren't alternative services in the Mitcham, Merton or south London area. We understand that the freeholders are also the business owners and we have approached the representor about exploring this issue further. For example, there may be opportunities for co-location of businesses and jobs and residential.
20	Hoo Hing Ltd and Elbrook Cash and Carry Ltd	all			5.5 In summary, the Draft Local Plan should be amended as follows: <ul style="list-style-type: none"> • The Draft Local Plan should be mindful of the Standard Method and set out how it would seek to address the needs arising from application of this within the Borough. • Publish the Housing Delivery Action Plan to set out the measures to increase supply of housing. • Allocate further sites to ensure that NLP targets, and indeed identified need, can be met earlier in the Plan period. • Allocate Bond Road site as a residential allocation; and • Delete Policy EC13.3 Protection of scattered employment sites as it adds further unnecessary duplication and development management control to sites and restricts housing delivery. • Review of other LP policies to determine whether there are positively prepared, effective and will achieve the growth required. 	No further changes proposed for the reasons set out in the comments above including: <ul style="list-style-type: none"> - Merton's local plan can demonstrate a five year housing land supply based on the London Plan 2021 housing target which resulted from extensive London-wide co-operation and dialogue at the London Plan EIP enquiry - the council has published its housing delivery action plan (document 11D10) and its housing annual position statement including 5 year land supply (11D11) - this, and the Plan itself and other evidence, demonstrates Merton can meet its share of London's new homes within the Local Plan period - proposals for Bond Road were received in the consultation period before Reg19 and so there was no scope for further dialogue and consultation for an allocation. However the council remains supportive of considering the site through the planning application process and as identified above, the protection of scattered employment sites and the consideration of co-location or alternative locations for businesses would be part of both a Local Plan or a planning application. The representor has not provided an estimate of the number of homes or any further details to bring the site forward, nor is there evidence of engagement with neighbours or current occupiers - the local plan is positively prepared, effective and justified.
21	HUDU	01B Good Growth			There appears to be an inconsistency in the wording regarding the provision of social and community infrastructure, in relation to the 'places'. We ask that this is consistent or that the reason for the differences is clear if retained.	Noted. See comments in rows below
21	HUDU	01B Good Growth			Wimbledon – there is no reference to social and community uses and unclear if this is an omission.	The text refers to a mix of uses, which would cover social and community uses. No change recommended
21	HUDU	01B Good Growth			Colliers Wood Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment and [insert social and] community uses.	Agreed. Change made
21	HUDU	01B Good Growth			Morden Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health by delivering a mix of uses, including affordable homes, offices and other employment opportunities, social [insert and] community facilities and retail to support new homes	Agreed. Change made
21	HUDU	01B Good Growth			Mitcham Reduce inequalities in the neighbourhood (health, income and social) and improve the wider determinates of health - providing a mix of uses, including substantial new homes (including affordable), employment, [insert social] and community uses. The following paragraph appears under the different 'places' within the chapter. We suggest amendments for clarity and ease of reading of the third bullet point · Maintain and create new public space and greening (including appropriate tree and shrub planting) of the street environment to: o improve air quality and help tackle climate change. o improve the health (including mental health) and wellbeing. Or [insert improve the health (including mental health) and wellbeing of the community] o Mitigate flooding from all sources.	Wording has been amended.

21	HUDU	01C Urban Development Objectives and Vision			Strategic Objective 3: places for people It is important that adequate social infrastructure including health facilities is delivered to support new homes and also the increase in the population through increased density of occupation. Clause e. refers to assessing the impact of major development. 'Assessing' will not necessarily result in maximising positive impacts and minimising adverse impacts, and the Council's objectives as it is only one step in the process. Therefore, we propose the following amendment: e. [DELETE Assessing the impact of] [INSERT Requiring] major development proposals [INSERT to maximise the positive impacts and minimise adverse impacts] on physical and mental health and wellbeing [DELETE to maximise the positive impacts and minimise adverse impacts.] The justification can explain that assessment of proposals is an important part of the process and refer to the London Plan's Strategic Objective 'Creating a Healthy City' and to the NHS HUDU HIA Toolkit.	Additional amendment to reorder words for clarity: [Assessing the impact of] REQUIRING major development proposals to maximise the positive impacts and minimise adverse impacts on physical and mental health and wellbeing [to maximise the positive impacts and minimise adverse impacts].
21	HUDU	01C Urban Development Objectives and Vision			Spatial Vision We suggest that bullet point 4 is amended to not only reflect a reduction in health and income inequality but also to increase overall health and wellbeing. Reducing inequalities does not necessarily mean an improvement in health and wellbeing for the most disadvantaged or the 'average' resident. [INSERT Improved community health and wellbeing and r] Reduced health and income inequality within the borough and the disparities between the east and west of the borough.	Additional modification for clarity: Improved community health and wellbeing and reduced health and income inequality within the borough and the disparities between the east and west of the borough.
21	HUDU	Site Allocations	Site Allocations		Site Allocations Under Infrastructure Requirements the sentence "Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan." is included within some of the site allocations but not all. However, the intent of this sentence is unclear. By 'have regard to' is it meant that development proposals will be expected to contribute to relevant identified infrastructure set out in Merton's IDP? If this is the case which the SELCCG supports then it should be reworded for clarity and to ensure that adequate infrastructure is provided alongside the new population as required by the NPPF and for the plan is sound. The proposed revised wording set out below should be included in all site allocations for consistency as each will create additional demand on infrastructure. "Development proposals for this site must contribute to [INSERT creating additional capacity required as set out in] Merton's Infrastructure Delivery Plan."	Officers have reviewed the wording on Infrastructure in each Site Allocation and agree that this should be consistent for each Site Allocation. Modifications have been made to add the following wording under "Infrastructure Requirements" in each Site Allocation. Where relevant, this wording has replaced the previous infrastructure wording. "Development proposals for this site must refer to the Merton Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal." This change is to improve clarity and ensure that developers meet the infrastructure requirements set out in the IDP. Officers disagree with the proposed HUDU wording. Through the planning application process, infrastructure requirements will be assessed and determined in accordance with the CIL regulations and S106 tests and therefore it is not required to refer to additional capacity.
21	HUDU	03 Mitcham	Mi2		Site Mi2 Birches Close, Mitcham, CR4 4LA We support the principle of this site allocation and the response of NHS PS as the site owners. Infrastructure requirements To ensure that [INSERT adequate] healthcare provision is delivered in this area [INSERT clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS] [DELETE and that there is no loss of potential NHS sites until this happens, the new Mitcham healthcare facility must be built and operational] before redevelopment can progress on [DELETE either the Wilson Hospital or] Birches Close [DELETE sites].	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity.
21	HUDU	03 Mitcham	Mi18		Site Allocation Mi18 – The Wilson We support the principle of this site allocation and the response of NHS PS as the site owners. Design and accessibility guidance [DELETE Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area.] [INSERT Healthcare with community and enabling residential development, or residential if the existing services are relocated within an alternative healthcare facility in the wider Mitcham area] Development of the site is an opportunity to [DELETE either] provide a health centre/community health centre in a neighbourhood with health inequalities/ poor health [INSERT and/or to [DELETE provide] new homes in an area of housing need. [DELETE (if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham).] Infrastructure Requirements However, under infrastructure requirements we propose the text is amended as follows: To ensure that [INSERT adequate] healthcare provision is delivered in this area [INSERT clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS] [DELETE and that there is no loss of potential NHS sites until this happens, the new Mitcham healthcare facility must be built and operational] before redevelopment can progress on [DELETE either] the Wilson Hospital site [DELETE or Birches Close sites].	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity.
21	HUDU	05 Morden	N5.1	5.1.46	The CCG has advised the Council that the growth projected for Morden Town Centre will require additional health infrastructure and this should be included in the text within the Growth and Neighbourhoods chapters. Reference is made in para 3.3.47 regarding the potential of Morden Road Clinic (Mo5) to be relocated. However, there is no reference to increased capacity to meet the needs of the population growth in site allocations. The relocation of the facilities on M05 should be part of a programme of expanded capacity. If this is facility is not relocated with additional capacity, then this increase will need to be provided elsewhere within the town centre.	Agreed. The following sentence is proposed at the start paragraph 5.1.46 as Additional Modification AM5.33, which will improve clarity and consistency of advice on this matter that is already referred to in the Morden Regeneration Zone site allocation text: <i>"As identified in the Infrastructure Delivery Plan 2021, the comprehensive regeneration of the Morden Regeneration Zone is likely to trigger the need for additional health infrastructure to meet local needs (AM5.33) Morden Road Clinic has also been identified by the NHS (National Health Service) as a site allocation (Mo5). As this site is located within the Wider Morden Town Centre Area, there There (MM5.1) may be an opportunity to relocate the health centre elsewhere within the Morden Regeneration Zone (AM5.6) to provide a modern, fit for purpose facility that meets the needs of the future population."</i>
21	HUDU	05 Morden	Mo4		Mo4 Morden Regeneration Zone This allocation omits a section regarding 'infrastructure requirements'. This should be rectified to ensure adequate infrastructure and include the provision of additional health infrastructure to meet the needs of the increased population in the area, either as part of the relocation of Morden Road Clinic and Morden Hall Medical Centre or through the provision of new infrastructure.	The initial two paragraphs in the 'Infrastructure Requirements' part of site allocation Mo4 states: <i>"Development proposals for this site must refer have regard to the Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal (AM5. XX) and Green Infrastructure Study 2020."</i> <i>Developers should engage at an early stage with the owners of the Morden Road Clinic and Morden Hall Medical Centre (Site Mo5), as the Morden Regeneration Zone development is likely to trigger a need for a health infrastructure contribution whilst also presenting an opportunity for the delivery of a modern replacement medical facility within Morden Regeneration Zone boundary."</i> The existing wording with proposed modification AM5XX will adequately address any increased population needs and would be more suitable to address potential (smaller) incremental proposals that might also trigger the need for a planning obligation in accordance with the CIL regulations and S106 tests.
21	HUDU	05 Morden	Mo5		Mo5 Morden Road Clinic and Morden Hall Medical Centre Morden Road, Morden, SW19 3DA We support this site allocation in principle however clinical capacity needs to be maintained for residents during redevelopment and increased capacity provided through the wider regeneration of the town centre. This should be reflected in the wording of the allocation	Agreed. Additional Modification AM5.48 will clarify this requirement: "Development proposals will need to demonstrate that clinical capacity will be maintained for residents during the redevelopment of this site."
21	HUDU	06 Raynes Park	RP1		Amity Grove is no longer owned by NHSPS and therefore the site ownership should be amended for accuracy	Additional modification made to remove NHS Property Services as site owner

21	HUDU	10 Health and Wellbeing	HW10.1		Strategic policy HW10.1 Health (including mental health) and Wellbeing While we support this policy we are concerned that it omits reference to 'improving health and wellbeing' which should be incorporated alongside "reducing health and wellbeing", in line with our earlier comments and to deliver the Council's vision set out in the draft plan. a. Working with strategic partners such as NHS (National Health Service) England, Clinical Commissioning Groups (CCG) and Merton's Health and Wellbeing Boards [INSERT in improving health and wellbeing], tackling health inequalities, public health safety (for example during pandemics and other health emergencies), promoting and encouraging healthy lifestyles and creating healthy environments in Merton for all.	Additional modification proposed for clarity Working with strategic partners such as NHS (National Health Service) England, Clinical Commissioning Groups (CCG) and Merton's Health and Wellbeing Boards in IMPROVING HEALTH AND WELLBEING. tackling health inequalities, public health safety (for example during pandemics and other health emergencies), promoting and encouraging healthy lifestyles and creating healthy environments in Merton for all
21	HUDU	12 Places and Spaces in a growing borough	D12.3	12.3.18	We welcome the amendments made to Policy HW10.2: Delivering healthy places since Stage 2a We suggest amendments to paragraph 12.3.18 for clarity as the last sentence is unclear. Additionally, the concern with difficulties caused by obstacles needs to be considered not just in refuse collection and recycling but through development, and road works/repairs and this should be reflected elsewhere in the plan for consistency and through the use of conditions when granting planning permission. 12.3.18. With the on-going push to increase recycling rates and minimise the amount of household waste going to landfill sites, bi-weekly collection of bins and a variety of other bins, bags and boxes for recycling present households with a number of problems in accommodating these requirements. These including providing sufficient off-street storage and that bins are accessible and do not obstruct footways, especially for people with [INSERT health difficulties, including mobility, sensory and mental health] [DELETE mobility or mental health problems] that make it difficult to navigate obstacles, [INSERT and] block[INSERT ing] accesses or carriageways on collection days [INSERT will cause major problems].	Officers have reviewed and agree with the proposed wording changes. Paragraph 12.3.18 (now 12.3.19) has been updated.
21	HUDU	All			We look forward to continuing collaboration with the Council in delivering the vision for the Borough, for improving the health and wellbeing of residents and reducing health inequalities. The SWLCCG and NHS partners are updating their estate strategy to reflect the NHS's response to Covid-19 as well as implementing the NHS Long Term Plan. We will share this with the Council to update the July 2021 version of the Infrastructure Delivery Plan.	Noted. The council will continue to work with HUDU and NHS partners on identifying health infrastructure needs for the borough.
22	John Innes Society	01A Introduction		1.1.5	2) Chapter 01A – Introduction: 1.1.15. We are pleased to see the Council acknowledges that Neighbourhood Plans are an important aspect of local planning but we feel the Plan's wording about the Wimbledon Neighbourhood Plan is very misleading. It should say "The Council has just taken a recent decision to refuse Plan Wimbledon's proposals to form a Neighbourhood Forum". Maybe a policy should be added to say <i>the Council will work actively with proposed Neighbourhood Forums to promote greater understanding of Neighbourhood Plans and their role, to encourage successful outcomes</i>	Noted. No change proposed to the Local Plan. The council's website https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/neighbourhood-plans contains much of the information in this representation, including the explanation of neighbourhood planning, including links to government's good practice guide on neighbourhood planning. It states "Neighbourhood planning allows residents, employees and businesses to come together through a 'Neighbourhood Forum' and produce a neighbourhood development plan. Once adopted, the neighbourhood development plan can be used to guide decisions on planning applications within the neighbourhood area. Find out more by visiting the Government's Planning practice guidance on Neighbourhood Planning. Neighbourhood planning gives communities direct power to shape the development and growth of their local area. They are able to develop a neighbourhood plan which will support the grant of planning permission for the new buildings they want to see go ahead. A Neighbourhood Plan may address a wide range of social, economic and environmental issues. The number and form of the issues addressed are dependent on what the neighbourhood forum considers to be relevant to the neighbourhood. A neighbourhood plan sits alongside the Council's Local Plan for the area, which provides policies and guidance at both a borough-wide and a neighbourhood scale Your Neighbourhood Plan must be in line (known as "general conformity") with the strategic policies in the area." The information on Merton's website then goes on to explain the neighbourhood forum application process, the neighbourhood plan production process and how to contact the council for more information. Practical support measures for neighbourhood planning and consideration of how CL is spent are very important matters but are themselves not planning policies and are not proposed to be contained in the Local Plan.
22	John Innes Society	12 Places and Spaces in a growing borough			3) Chapter 12. A Local Plan is a Land Use reference document, and to be effective, it needs to be easy to access and use. PLACES AND SPACES IN A GROWING BOROUGH is not a clear title for the Chapter which contains Development Control Policies. We suggest a sub-heading (Development Control Policies).	All policies within the Local Plan are to be used by the Development Control Team in the assessment of planning applications. Officers do not agree that this title needs to be amended. No change recommended.
22	John Innes Society	17 Appendices			6) Throughout the Plan there are references to the Borough Character Study, but this document has been heavily criticised for being shallow, inaccurate and, so far as our Area of Benefit in Merton Park is concerned, unfit for purpose. It was prepared by Consultants who possibly had insufficient local knowledge. Merton Planning Officers had already done work on Character Assessments for much of the Borough but instead of building on these and finishing the task, Consultants presented a standardized study which is more about finding sites for new developments than it is about Character. We do not think it should be classified as an SPD.	No change proposed. Merton Council adopted the Borough Character Study as a supplementary planning document to Merton's Local Plan in June 2021.
22	John Innes Society	17 Appendices			1) All the maps of Merton Park are yet to be corrected. The Maps exclude Watery Lane, Manor Gardens, Manor Road, Cleveland Avenue, Merton Rush, Merton Park Parade, the Nelson Health Centre and the Eastern side of Cannon Hill Lane from Kingston Road to Aylward Road, all part of the John Innes Estate at Merton Park. There can be no justification whatsoever for cutting Watery Lane and Manor Gardens out of Merton Park, as they are both within the John Innes (Merton Park) Conservation Area boundary.	From the comments made it is assumed the reference to maps are those shown in the Merton Borough Character Study SPD 2021. This SPD was adopted in June 2021 following extensive consultation. This SPD is guidance, rather than planning policy. It does not affect the John Innes Conservation Area boundary. No changes have been made to the Heritage Policies Maps through the new Local Plan. No further action required.
22	John Innes Society	17 Appendices		Page 591	Neither the John Innes Park nor the John Innes Recreation Ground are in Morden. They are in Merton Park and part of the John Innes Merton Park Estate. That matters because they are some distance from Morden but when amenity space deficient development there is considered, if they are listed as "in Morden" they may be taken into account as available local public open space, even though they are a mile away.	The list of open space sites in the Appendices includes a column that refers to one of the 6 Neighbourhoods where each site is located, as set out in the Policies Map 2021. For clarity and correctness, the name of this column will be changed from "Area" to "Neighbourhood". There are 6 neighbourhoods set out in the Local Plan - Mitcham, Morden, South Wimbledon, Colliers Wood, Wimbledon and Raynes Park. While Merton Park is recognised as one of the smaller areas within the Morden neighbourhood, for the tables in the Appendix, any site will be referred to as being located in the relevant neighbourhood. Officers have reviewed and recommend changing the Appendix Open Spaces tables headings from "Area" to "Neighbourhood"
22	John Innes Society	17 Appendices		Page 608	5) Chapter 18 page 608. The Garden Wall around the Church Lane Playing Field should have four sides , not four sites . It should also be described as surrounding the Church Lane Playing Field, not as Church Field, of which there is another with that name in SW19, belonging to the other St. Mary's Church, in Wimbledon Village. The word Duplicate should be deleted, as the Church Lane Playing Field does not appear more than once in this list.	This refers to Appendix page 608. Table of Heritage assets. Officers have reviewed and have removed this row as it is a duplicate of one of the rows above in the table. This row correctly refers to sides and not sites.
22	John Innes Society	All			7) The Local Plan contains a Glossary but still not even a basic Index. Many inter-related policies appear in various Chapters and under a variety of topic headings, but all need to be taken into account for any development proposal. To make the Plan effective we consider there should be an Index and Search facility, and had this suggestion, which we made on the previous consultation, been followed, it might have resulted in the Plan being far shorter and more coherent than it is now.	Noted. This will be considered once the Plan is adopted
22	John Innes Society	All			The Council might then have noticed that the Chapter Numbers were incorrect. In Consultation 2a they were not even in sequence. (See point 1 of our representations dated February 2021). There still no Chapter 8. Very confusing for anyone who does not start by reading the note at the end of the introduction to the Plan. Merton has a significant turnover of Planning Officers, and we fear they will find it very difficult to identify all relevant policies and their interaction, when spread over such a long and fragmented Local Plan	Noted. This will be considered once the Plan is adopted
22	John Innes Society	All			We wish this letter to be put before the Inspector and we reserve the right to appear at the Public Examination	Noted.
22	John Innes Society	N/A			Reluctantly, because it was carried out in difficult circumstances, we have to put on record that the Stage 2a Consultation may have been flawed. To the best of our knowledge, the consultation did not state that only respondents who give their contact details would have their representations taken into account. A large number who responded online (c.250) did not include contact details, while only 104 online respondents did. The total number of responses by any means considered valid to the Council, was 254.	No further change proposed. As reported to councillors, all responses (anonymous or otherwise) were read. 250 anonymous responses were received to an online survey; 184 of those responses didn't answer even the first question and did not provide any contact details. The remaining anonymous responses (i.e. respondents to the online survey who filled in at least one question but didn't provide contact details) were in the same vein as respondents who provided contact details and so the views were considered.

23	Kingston Space Properties	13 Economy	13.2	13.2.18	<p>KSP are generally supportive of the Local Plan's aims to protect and intensify designated industrial land across Merton. However, whilst supported land uses are not identified in draft Policy EC 13.2, paragraph 13.2.18 informing the policy states that proposals for manufacturing (Class B2) and distribution (Class B8) will be welcomed, proposals for research and development, light industrial or particular sui generis uses may be supported where the nature of the development requires an industrial location.</p> <p>This approach is not consistent with the economic policies in the London Plan (March 2021), with Policy E5 (Strategic Industrial Locations) stating that development should be supported where proposed uses fall within industrial-type activities. The types of activities listed in Policy E4 (Land for Industry, Logistics and Services to Support London's Economic Function) include light and general industrial (Class E(g)iii)B2) and flexible (Class E(g)iii)B2/B8) space to accommodate services that support the wider London economy.</p> <p>The proposed limitation of light industrial (Class E(g)iii) and research and development (Class E(g)ii) uses in SILs and other designated industrial sites directly conflicts with Policies E4 and E5 of the London Plan, and therefore is not considered sound in accordance with paragraph 35 of the National Planning Policy Framework.</p>	<p>No further change proposed. It is not considered that there is a conflict between policy 13.2, including paragraph 13.2.8 and London Plan 2021 policies E4 (land for industry, logistics and services to support London's economic function) and E5 (Strategic Industrial Locations). Merton's policy 13.2 supports the same industrial type functions in SILs as London Plan policy E5, while also addressing the other aspects of London Plan policies E4 and E5 such as making effective use of industrial land (particularly in Merton where industrial demand is high, rents are high and vacancies are low, with limited market churn restricting supply and access); to substitute industrial capacity where there is evidence that more suitable locations exist (again, relating to the limited SIL space in Merton and not compromising SILs being able to operate successfully in a 24 hour operation. Merton's proposed policy permits Light industrial (Class E(g) iii) in Merton's SILs but there is also scope for these to locate elsewhere in the borough.</p>
23	Kingston Space Properties	13 Economy	13.2	13.2.18	<p>Amenity KSP welcome the inclusion of part i of draft Policy EC 13.2, which states that the Council prioritises industrial and distribution uses that could operate 24-hours and are not compatible with homes, schools and other sensitive uses. The approach is consistent with the London Plan and meets the current market demand and expectations which is essential for KSP for attracting prospective tenants.</p> <p>Supporting paragraph 13.2.18 identifies the need for businesses in designated industrial areas to operate without excessive constraints from nearby homes, with paragraph 13.1.11 reinforcing the Council wanting to support these sites which can continue to safely accommodate modern business operations in an urban setting. This is strongly supported by KSP, particularly in the context of Willow Lane which is an established industrial site and meeting modern day operational requirements for tenants.</p> <p>However, paragraph 13.2.21 notes that proposals for new development or change of use will not be granted where there will be harm to the amenities of occupants neighbouring buildings in the absence of any mitigation. As identified in draft Policy EC 13.2, a primary characteristic of SILs is to enable businesses to operate 24-hours, therefore the paragraph as drafted is considered to conflict with this. In accordance with part D of London Plan Policy E5 for proposals not to compromise the integrity or effectiveness of the locations in accommodating industrial-type activities to operate on a 24-hour basis, we suggest clarity is added in the form of the Agent of Change principle. This approach would reflect that stated in paragraph 13.1.11 and provide consist approaches in the Local Plan.</p>	<p>Agreed. Proposed additional amendment to paragraph 13.2.21 for clarity</p> <p>13.2.21. Proposals for new development or change of use should be compatible with <u>the effectiveness of the SIL in accommodating the 24-hour operation of industrial type activities including</u> the amenity of neighbouring occupiers of buildings. If proposals are likely to conflict with the successful operation of existing businesses nearby or cause harm to the amenities of occupants of neighbouring buildings without any way of mitigation, planning permission will not be granted. Mitigation measures through design conditions or planning obligations may be sought to improve site access or minimise disruption to neighbouring businesses where necessary. <u>In line with the Agent of Change principle, the council will not support proposals in designated industrial areas that would curtail the industrial operations of existing businesses.</u></p>
23	Kingston Space Properties	13 Economy	13.2		<p>Small and Medium Businesses</p> <p>Draft strategic Policy EC13.1 references that a strong supply of appropriate space for small businesses should be provided across the Borough, in locations which optimise the needs of business while minimising disruption to local amenity.</p> <p>London Plan Policy E2 states that provision and protection should be made, where appropriate, for a range of B Use Class business space in terms of type, use and size, noting that the space should be fit for purpose with regard to the type and use. Given the 24-hour nature of SILs and in certain locations, from a management and commercial perspective, accommodating smaller businesses within the same area as larger industrial units is not possible operationally. Clarification should be included in draft Policy EC13.1 to identify the type of employment land small businesses will be directed to, and if this is a requirement for industrial sites, policy should include flexibility that such uses should not undermine the operation and function of the wider SIL and neighbouring uses.</p>	<p>No further change proposed. Merton's existing SILs contain a range of business sizes, including small businesses which sometimes occupies established purpose build space within existing SILs. The 24 hour operation of SILs is already protected in policy (see EC13.1 (d) d. <i>Protecting and managing the designated Strategic Industrial Locations and Locally Significant Industrial Sites, ensuring that they are prioritised for industrial and distribution uses that could operate 24-hours and are not compatible with homes, schools and other sensitive uses;</i>) which applies regardless of the business size.</p>
23	Kingston Space Properties	13 Economy	13.2		<p>Draft Policy EC 13.2 includes reference to the provision of shared workspace, flexible or co-working space. The supporting text to this policy references office floorspace, however the policy has drafted does not specify the type of employment uses where this is required. The policy should be specific on where shared and flexible workspaces are required. It is expected such provision would not be a requirement for industrial sites, however if so it should be explicit in policy such space should not compromise the function of SILs to operate on a 24-hour basis</p>	<p>Minor mod for clarity: para 13.2.24 <i>"Shared, flexible and co-working business spaces and characterised by..."</i> No further change proposed. Policy EC13.1 (d) already protects SILs from development that could disrupt 24 hour operations. In general shared, flexible and co-working space is more common with offices however it also exists in a light industrial / workshop format and this can already be found in Merton. Para 13.2.24 contains a long list of shared, flexible and co-working space characteristics and paragraph 13.2.25 enhances the provisions of policy 13.2 to make it clear of the evidence required by the council to ensure co-working is genuine.</p>
23	Kingston Space Properties	13 Economy	13.4		<p>Planning Obligations</p> <p>KSP is supportive of ensuring that developments contribute towards local employment initiatives. Draft Policy EC 13.4 includes a number of obligations, however the policy does not include flexibility to account for changes in the economic climate. The obligations as drafted, particularly parts c and e, are considered by KSP to be <u>challenging and flexibility should be built into the polic</u></p>	<p>No change proposed. The provisions of policy EC13.4 (c.) and (e.) require the jobs or business opportunities to be advertised to local residents / local SMEs to ensure they have the opportunity to compete. It does not require the landowner / developer / contractor to employ or procure people or businesses through this route so there is already <u>built in flexibility</u></p>
23	Kingston Space Properties	13 Economy			<p>Summary Overall, KSP are supportive of the approach to protect and enhance employment land within SILs to grow the Borough's economy. The protection of SILs for 24-hour operation alongside intensification of employment uses is welcomed, however as set out above, we consider further clarifications and amendments are required to enable the Local Plan to be found sound and consistent with the London Plan.</p> <p>We trust the above comments are helpful in the context of advancing the Local Plan and would be grateful if you can confirm receipt of these representations. Should you wish to discuss these representations in detail, please do not hesitate to contact me or my colleague James Sheppard (james.sheppard@cbr.com)</p>	<p>noted</p>
24	Leek Real Estate	11 Housing	H11.1(f)		<p>Affordable housing requirement on small sites - This approach, that maybe on a small percentage of sites it may be viable to provide a contribution, is seemingly the justification that it is acceptable to apply the approach in a blanket manner to all small sites. This is a flawed approach and contrary to the NPPF (para 64). Policy H11.1f and the small sites financial contribution should be deleted.</p>	<p>No further change proposed. Policy H11.1(f) requirements are supported by robust evidence that this a viable requirement.</p>
25	Legal and General Property Partners (Industrial Fund) Limited	13 Economy			<p>Support for Local Plan position on Boundary Business Court; description of Boundary Business Court</p>	<p>noted</p>
25	Legal and General Property Partners (Industrial Fund) Limited	13 Economy	EC13.3		<p>Within the Stage 3 Publication we note that the Council has amended Part iii of Policy EC13.3 to reduce the period that full and proper marketing needs to be undertaken for, from 30 months to 18 months. This change is strongly supported by our client. A marketing period of 30 months is considered unreasonable and risks unnecessarily delaying potentially deliverable sites from being developed for an alternative identified need. Despite the change at Part iii, we note that supporting text to Policy EC13.3 still refers to 30 months. This should be amended to 18 months within the next iteration of the Local Plan.</p>	<p>minor modification proposed to para 13.3.7 to bring it into line with Policy 13.3 scattered employment sites. Last sentence of para 13.3.7 "... in accordance with the criteria set out in the Appendices, for a minimum of <u>60 18</u> months (2 1.5 years).</p>
25	Legal and General Property Partners (Industrial Fund) Limited	13 Economy			<p>Whilst the general approach to the employment policies within the Stage 3 Publication is welcomed, we note that no allowance has been made for ancillary uses within industrial estates. Such uses (for example cafes, gyms and crèches) are common place within industrial estates across the country and support the primary function of estates rather than detract from them. They cater for the needs of employees and increase the attractiveness and longevity of estates. They bring with them a range of economic and social benefits and are recognised within many other Local Plans within London. Given the above, it is respectfully requested that allowance be made within the emerging Local Plan for such supporting ancillary uses. This is considered most appropriate within Policy EC13.2. Like in other Local Plans within London, the wording can be such that it ensures that the uses and quantum are truly ancillary to the primary use, but ultimately the aim is to ensure that policy does not exclude such uses in principle.</p>	<p>No further change proposed. Ancillary uses do not need to be identified in policy.</p>

26	Lidl Great Britain Limited	13 Economy	EC13.1	<p>Strategic policy EC13.1 sets out the general principles and goals of the Chapter 13 of the Draft Local Plan, which concerns the Economy and Town Centres. The policy sets out how the Council aim to support economic recovery, business investment and job growth across Merton.</p> <p>At Paragraph 2 the policy explains the Council's ambitions to encourage business investment and job growth across the borough, to create a diverse and resilient economy. The Council aim to achieve this by (inter alia); supporting development which increases the number and range of jobs available; fully considering the economic impact and potential of development; promoting resource efficiency, including land; supporting the hierarchy of town centres; and requiring local recruitment for major developments.</p> <p>Meanwhile, Paragraph 3 sets out that the Council will seek to ensure a supply of viable and appropriate sites and premises for businesses, jobs and other enterprises in suitable locations. The policy sets out that this will be achieved by (inter alia); strengthening the "town centre first approach", directing town centre uses to the major and district town centres; supporting local town centres and neighbourhood shopping parades; protecting and managing the designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS); facilitating new employment by protecting and improving scattered employment sites; and supporting the redevelopment of purpose built retail units into other uses.</p> <p>Lidl is generally supportive of Strategic Policy EC13.1 and agree with the overarching aim of the policy to support economic recovery, business investment and jobs across Merton. Lidl has no concerns over the strategy set out at Paragraph 2 and agree that planning policy and decisions should contribute towards the creation of employment opportunities, particularly for local residents as well as social, environmental and economic sustainability; and finally should seek to protect and enhance designated centres.</p> <p>With regards to Paragraph 3, it is agreed that directing town centre uses towards the Borough's designated centres should be a priority. However, it is also considered that in certain circumstances suitable and available opportunities within the designated centres simply may not exist and that edge and out-of-centre locations may represent a sustainable alternative, which would not lead to significant adverse impact on neighbouring designated centres. This is discussed in greater detail when addressing Draft Policies TC13.5 and TC13.6 below. Furthermore, Paragraph 3 of Policy EC13.1 affirms the Council's commitment to protect and manage the designated Strategic Industrial Locations (SIL's) and Locally Significant Industrial Sites (LSIS's) and other employment sites. Whilst Lidl acknowledge that these locations hold special importance and should be safeguarded for industrial uses where appropriate, it is considered that in certain cases these sites may become surplus to requirements or are now unsuitable for industrial uses. In these cases, it is considered that alternative uses should be thoroughly considered on these sites through both the decision taking and planmaking processes. This is discussed in greater detail below.</p> <p>Additionally, given the changes to the Use Class order, which were adopted in September 2020, it is considered that the line between 'traditional' employment uses and other employment generating uses has been 'blurred'.</p> <p>As such, it is considered that, where appropriate, other employment generating uses, such as retail, should be considered on established or proposed employment sites. Further detailed discussion regarding this can be found below.</p>	Noted - individual issues considered below
26	Lidl Great Britain Limited	13 Economy	EC13.2	<p>Lidl is supportive of the Council's ambitions to ensure that there is an ample amount and sufficient typologies of employment sites and floorspace to meet the identified demands of the Borough, particularly for those land uses with particular needs. However, it is considered that the Covid-19 pandemic, and the likely lasting impacts, has led to a major shift in the UK economy including working and travel patterns. Moreover, it is suggested that the changes to the Use Class Order, which were brought into effect in September 2020, were in part a response to the Covid-19 pandemic. In this context it is considered that a certain level of flexibility should be included in emerging planning policy to enable the planning system to be more adaptable and agile to changing market conditions.</p> <p>With this in mind, it is considered that Policy EC13.2 should demonstrate greater flexibility in terms of land use allocations and consider alternative employment generating uses on land which may be unsuitable or undesirable for 'traditional' employment uses. It is considered that, as currently drafted, the policy may sterilise sites which may be suitable for alternative land uses and may have the potential to bring significant benefits to the Borough</p>	No change proposed. Policy EC13.2 is in general conformity with the London Plan 2021. There is no evidence that greater flexibility is necessary over and above that already provided in the NPPF 2021 on out of centre developments, London Plan 2021 and policy EC13.2 given the ongoing and long term market demand for industrial uses and the lack of evidence that the proposed policies would harm the local or London wide market
26	Lidl Great Britain Limited	13 Economy	EC13.2	<p>With regard to the section of Policy EC13.2 which concerns office development, it is considered that the changes to the Use Class Order blur the line between retail and 'traditional' employment B1 uses and ultimately embed a recognition of the similarities between office and retail land uses. Indeed, the overarching title of 'Class E - Commercial, Business and Service' emphasises this point. On this basis, it is considered that Policy EC13.2 should more clearly acknowledge these changes and demonstrate a more open approach to office land use designations, which takes into account the significant economic benefits which can be derived from alternative employment generating uses. Whilst there is scope for office floorspace and sites to be redeveloped/reused for non-employment uses through marketing, it is considered that as retail and office uses now share the same use class (E Class), development of office sites for retail purposes should not be required to undergo the same level of marketing evidence</p>	No change proposed. Policy EC13.2 (g) states "where planning permission is required" so the building could change to other uses in Class E (such as retail) without the need for planning permission or reference to this policy.
26	Lidl Great Britain Limited	13 Economy	EC13.2	<p>With regards to SIL and LSIS sites, it is considered that given the current uncertain economic, social and political climate, Local Planning Authorities should show more openness to the controlled release of underutilised land on a case-by-case basis. Allied to this, local plans should be able to demonstrate greater flexibility in being able to address both anticipated and unanticipated changes to the economy and reform of the planning system. As presently drafted, Policy EC13.2 does not offer any scope for alternative uses of SIL and LSIS sites regardless of the changing context of a site, it's surroundings and wider economic changes. Whilst it is acknowledged that SIL and LSIS sites perform a crucial role in the economic function of the Borough and Greater London, it should be noted that changes to the patterns of employment land use may mean that in some cases sites may become surplus to requirements in a short order and not be able to provide beneficial economic use. It is recognised that SIL and LSIS sites perform a specific function, and as such must be protected where it is clear that they are or can meet that function. However, it is considered that significant economic, social, environmental or spatial changes may occur over the plan period which may render a SIL or LSIS site unfeasible or undesirable. Given this, it is proposed that a mechanism for the release of SIL or LSIS in specific circumstances is put in place to account for any future changes. Given the above, Lidl consider that revisions to Policy EC13.2 are required to allow for greater flexibility across the Borough's employment sites and floorspace in order to meet social, economic and environmental change across the plan period. It is also considered that policy and decisions should reflect the positive economic impact that non-traditional employment uses, such as retail, can have on the local area and on the Borough as a whole</p>	No change proposed. The policy is justified. Merton's SILs and LSIS are well occupied and have high rents. Successive London Plans have long identified Merton and its neighbouring boroughs as having high demand for industrial land and premises. SILs and LSIS make up a small proportion of Merton, none of these are within town centres where the NPPF says retail should first seek to locate and there are other locations that retail stores can locate in Merton. Local Plans must be reviewed every five years which can take account of significantly changing market demand, should this occur.
26	Lidl Great Britain Limited	13 Economy	EC13.3	<p>Draft Policy EC13.3 sets out that the Council will resist the loss of "scattered employment sites" to residential use unless; the site is located within a predominantly residential area where it impacts on amenity; the site is deemed to be unsuitable for employment uses; and the site is surplus to requirements and/or has been marketed for 18 months. The policy goes on to state that where these sites do not meet the outlined criteria, residential development may be permitted as part of a mixed-use development.</p> <p>Lidl are generally supportive of Policy EC13.3, however, they are concerned that the policy only offers scope for the use of the scattered employment sites for residential and employment uses. As previously mentioned, it is considered that the changes to the Use Class Order in part recognises the employment benefits derived from retail and other E Class uses. As such, it is considered that retail use should also be considered as a suitable alternative on scattered employment sites</p> <p>Given the above, it is considered that an additional section should be added to Policy EC13.3 to establish the means by which retail development on "scattered employment sites" would be deemed acceptable.</p>	No change proposed. Not justified. Scattered employment sites are, by their nature, located in areas unsuitable for retail (e.g. out of centre). Introducing blanket support for retail on out of centre locations would not be justified against the NPPF or London Plan
26	Lidl Great Britain Limited	13 Economy	EC13.3	<p>Whilst Lidl acknowledge that a clear hierarchy of centres is a necessity, it is considered that the specific floorspace restrictions placed on the of units within certain centres through Policy TC13.5 is too prescriptive and could block development which could be judged to be desirable and sustainable. Ultimately, this is an area which rests on the judgement of the planning authority through the decision making process and the local plan should provide flexibility for officers and Members to exercise this judgement. As already outlined, economic, social and environmental changes over the plan period may result in significant changes in the demand and supply of certain land uses. For this reason, it is considered that placing such specific restrictions on the scale of proposals within certain centres may mean that these centres fall behind and become unable to adapt to these changes.</p> <p>Given the above, it is suggested that the policy be amended to adopt a more flexible approach with regards to Local Town Centres, where each development is assessed on a case-by-case basis where the social, economic and environmental context of the site and surroundings is fully assessed at the time of the application.</p>	No change proposed. Not justified. The NPPF 2021 paragraph 86 states that planning policies should defined a network <u>and hierarchy</u> of town centres... and reflect their distinctive characters, make clear the range of uses permitted in such locations as part of a positive strategy for the future of each town centre. The proposed amendments to the policy would not do this.

26	Lidl Great Britain Limited	13 Economy	EC13.6		<p>Draft Policy TC13.6 asserts that development of main town centre uses, exceeding 280 sqm, in edge and out-of-centre locations will only be permitted where a sequential assessment and impact assessment demonstrates that the development proposed satisfies the Council's requirements. The policy then outlines that 'local convenience development' outside of town centres will only be permitted where: 'the proposal will be a replacement for an existing convenience shop; or, the proposal will meet local needs in an area identified as deficient in local convenience shopping (including convenience retail activity in petrol stations); and the overall floorspace of the local convenience shop (including petrol stations) would not exceed 280 sqm net retail floorspace.' Finally, the policy states that planning conditions may be imposed on development outside of the designated centres in order to ensure the vitality and viability of neighbouring centres is maintained. Generally, Lidl are in support of Policy TC13.6 and agree that where possible town centre uses, including retail, should be located within the Borough's designated centres. However, as currently drafted, it appears that Policy TC13.6 seeks to prevent all convenience development exceeding 280 sqm outside of the Borough's designated centres. It is considered that, should this be the case, the development of larger convenience retail units across the Borough may be sterilised by Policy TC13.6. This appears to contradict the approach set out in the NPPF which supports the principle of retail development on edge and out of centre sites where it passes both the retail sequential and impact tests. It follows that in certain designated centres there may not be any available or suitable sites. Placing such a floorspace restriction on out of centre sites would preclude many retail operators who provide a key services to local residents. Paragraph 81 of the NPPF requires that planning policies and decisions help to create the conditions in which business can invest, expand and adapt. The NPPF goes on to state that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development". Crucially, at Paragraph 8 the NPPF asserts that planning policy should "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances." Given that the restrictive nature of Policy TC13.6 has the propensity to block positive investment in the Borough, it is considered that the policy is in clear contradiction of this section of the NPPF. Moreover, it is considered that the inclusion of guidance at Chapter 7 of the NPPF clearly demonstrates that edge or out-of-centre retail and leisure development which exceed local or national thresholds should be determined in line with the sequential assessment and impact assessment process. As such, it is considered that the restrictions proposed through Policy TC13.6 would effectively remove this process for larger convenience retail development, which is considered to contradict the provisions of the NPPF. Furthermore, it is considered that at a local level, the proposed restrictions set out in the policy could have an unintended adverse impact on the communities they are seeking to support. As previously mentioned, it is considered that a level of general flexibility is required in planning policy in order for policy to adapt to changing circumstances. As currently written, the inclusion of a blanket floorspace restriction on edge or out-of-centre retail development is unnecessarily rigid. Should demand for convenience retail rise throughout the plan period, as would be expected given the Council's goals to provide additional residential development across the borough, it is considered that Policy TC13.6 would place a bar on necessary convenience retail development, as suitable sites within designated centres may not become available.</p> <p>Given the above, it is considered that the limit on convenience floorspace in edge or out-of-centre locations should be removed and a more flexible judgement based approach should be adopted which reflects the national policy and practice guidance .</p>	<p>No change proposed. Not justified. The NPPF 2021 paragraph 86 states that planning policies should defined a network <u>and hierarchy</u> of town centres... and reflect their distinctive characters, make clear the range of uses permitted in such locations as part of a positive strategy for the future of each town centre. The proposed amendments to the policy would not do this.</p>
26	Lidl Great Britain Limited	N/A			General introduction to letter and Lid business model and NPPF / plan flexibility	Noted.
26	Lidl Great Britain Limited	16 Sustainable Travel			<p>The key points to be drawn from this Representation are as follows:</p> <ul style="list-style-type: none"> • Whilst the majority of trip purposes can be accommodated by active and sustainable travel modes, there are a small proportion of trip types where this can be difficult. The purchase of bulk goods such as a food shop is problematic for walking, cycling and public transport modes of travel. Policy planning should recognise this differentiation and allow flexibility for such uses going forward. • For food store operations, the PTAL score of the site does not alter the need to offer car parking for the bulk shopping trip. This does not mean that visits by car are the predominant mode, evidence from Lidl's Cricklewood and Barking store operations are provided to demonstrate this. • The generic one size fits all approach for car parking for non-residential uses represents a significant concern to an operator such as Lidl given existing demand (even in well-connected areas) and the need to transport bulk goods. • Any future adopted car parking standards needs to recognise that, particularly with regard to the Use Class Order changes, specific development types may require special dispensation and that a generic one size fits all approach for car parking for non-residential uses is not appropriate. • No consideration is given to the role of food store car parking in the wider assistance that it can and does provide for electric vehicle charging opportunities, whereby Lidl has invested heavily in rapid EV charging points in its stores. • The London Plan (2021) is outdated on the issue of Use Class Order changes. Simply altering all A classes to E-class in relation to parking has no consideration in terms of the potential impacts of parking on the various uses that can operate from the new Class E classification. 	Comments and evidence presented in the submission noted and considered.
26	Lidl Great Britain Limited	16 Sustainable Travel			<p>Recommended Policy Wording</p> <p>On the basis of the evidence presented above, we request that the any future changes to the parking policy position set out in the Local Plan is adapted to specifically relate to non-residential uses allowing the following flexibility for food retail operators going forward and in acknowledgement that the Use Class Order changes will require a flexible approach to parking provision across sites. Suggested wording such as the following could be used:</p> <p>'The parking requirement for all non-residential development, whether expansions of floorspace on existing sites, the redevelopment of existing or cleared sites, or new non-residential development on new sites, will be determined in the light of the submitted Transport Assessment or Travel Plan, which must take into account the objectives of the London Plan and Local Plan policies to promote and achieve a shift towards sustainable modes of travel. The presumption will be that vehicle parking will be kept to the minimum necessary to ensure the successful functioning of the development. This will be supported by further development of local public transport networks and sustainable modes of travel such as wider footpaths, good cycling infrastructure and well-designed public realm walking and cycling routes'.</p> <p>Any future car parking policies within the Local Plan needs to allow for operational flexibility, particularly where opportunities for walking, cycling and public transport are limited.</p>	<p>No change. Disagree with the proposed policy wording that would represent a divergence from London Plan policies. The proposed policy wording is too flexible, applying to all non residential development on a case by case basis, which could enable development generating a high volume of trips, including food retail to locate in inaccessible locations reliant on car trips in contradiction to sustainable travel objectives. It should also be noted that London Plan policy T6 L already provides for some flexibility of the standards for redevelopment of retail sites. "Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London."</p>
27	London Historic Parks and Gardens Trust	12 Design	D12.5		<p>Policy D12.5 Managing heritage assets</p> <p>f. Proposals affecting a heritage asset or its setting should conserve and enhance the significance of the asset as well as its surroundings and have regard to the following:</p> <p>Our response</p> <p>The wording of Policy D12.5 focusses mainly on the built heritage. Merton is clearly aware of its historic parks and gardens (both designated and non designated) as referenced in the local plan justification text and on its website https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/historic-buildings-parks-gardens .</p> <p>Unfortunately the impacts of development on valued open spaces have not been addressed in policy and therefore they will be unprotected by the local plan.</p> <p>Insert</p> <p>Proposals affecting the layout, design, character, use and function of both designated and non designated historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration.</p>	<p>The policy wording has been reviewed and amendments have been made.</p> <p>Local Historic Parks and Gardens form part of the unique character of Merton, alongside all designated and non designated heritage assets.</p> <p>Policy D12.5.f has been amended to directly refer to non designated and designated heritage assets. An additional policy D12.5.f.iv has been added to ensure that 'Proposals should not prejudice the future restoration of designated and non designated historic parks and gardens.'</p> <p>Furthermore, justification text D12.5.6 has been amended to add clarity to all undesignated heritage assets.</p>
27	London Historic Parks and Gardens Trust	12 Design	D12.5		<p>Clarity of policies for historic parks and gardens</p> <p>Please continue to respect the heritage value of all "designed landscapes" / "historic parks and gardens" and ensure changes do not exclude undesignated heritage assets of open spaces.</p> <p>Heritage assets include designated and non designated sites. There are two tiers of historic parks and gardens, those on Historic England's register – "registered parks and gardens" and those of local interest. https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/historic-buildings-parks-gardens .</p>	<p>The policy wording has been reviewed and amendments have been made.</p> <p>Local Historic Parks and Gardens form part of the unique character of Merton, alongside all designated and non designated heritage assets.</p> <p>Policy D12.5.f has been amended to directly refer to non designated and designated heritage assets. An additional policy D12.5.f.iv has been added to ensure that 'Proposals should not prejudice the future restoration of designated and non designated historic parks and gardens.'</p> <p>Furthermore, justification text D12.5.6 has been amended to add clarity to all undesignated heritage assets.</p>

27	London Historic Parks and Gardens Trust	15 Green infrastructure	O15.2	<p>Policy O15.2 Open Space and Green Infrastructure</p> <p>c. Ensure that development proposals within designated open spaces (which have met the conditions set in part b) above, meet all the following criteria:</p> <p>i. the proposals are of a high quality design and do not harm the character, appearance or function of the open space and;</p> <p>ii. the proposals retain and/or improve public access between existing public areas and open spaces through the creation of new and more direct footpath and cycle path links; and,</p> <p>iii. the character and function of leisure walks are preserved or enhanced.</p> <p>Our response Policy Omission</p> <p>The policy omission relates to consideration of impacts of development outside the open space on the design of the open space, the experience of being within the space and on views from within looking out and from outside looking in. Such impacts could be loss of tranquillity, daylight, outlook, air quality, micro-climatic effects, overshadowing and amenity.</p> <p>Insert the impact of development on views and the setting of open spaces should be carefully managed to maintain the character and enjoyment of these spaces.</p>	<p>Officers have reviewed the policy and this matter is already covered in the Design Policy D12.2(k), D12.6(i) and (j) and the supporting text.</p> <p>Officers recommend some minor wording changes to Policy D12.2(k) and the supporting text for clarity on this point, but do not recommend any changes to the Open Space policies.</p> <p>London Plan policy D9 also sets out visual and environmental impact requirements for tall buildings proposals adjacent to open space sites.</p>
27	London Historic Parks and Gardens Trust	N/A		<p>Dear Future Merton Team</p> <p>We have submitted a response via the survey, but got to the end & was surprised. Is this your Reg 19 stage?</p> <p>Please notify us of the appointment of the Planning Inspector and the adoption of the Local Plan.</p> <p>We are sorry that we have had to make this response at this late stage.</p> <p>I have checked through our records and I can confirm that neither The Gardens Trust (a statutory consultee) nor London Historic Parks and Gardens Trust have been consulted on the preparation of the Local Plan.</p> <p>London Historic Parks and Gardens Trust trades as The London Gardens Trust (previously London Parks and Gardens Trust).</p> <p>The London Historic Parks and Gardens Trust is a registered charity, affiliated to the national Gardens Trust (GT) a statutory consultee for planning applications.</p> <p>We champion all London green space and make observations on planning proposals, both on behalf of the GT for sites on the Historic England Register of Parks and Gardens of Special Historic Interest, and also in relation to other green open spaces, especially those in our Inventory</p> <p>https://londongardenstrust.org/conservation/inventory/</p> <p>We are happy to speak to your team or the Inspector if this would be helpful</p>	<p>Thank you for your response to the Stage 3 / Regulation 19 response and thank you for your offer of continued dialogue. We apologise that the Stage 2a consultation did not reach you. We will continue dialogue with you and seek to resolve any outstanding issues you may have</p>
28	Love Wimbledon	02 Climate Change		<ul style="list-style-type: none"> A clearer focus on climate action in building development, refurbishing rather than rebuilding where possible, supporting commercial retrofits and using the LETI standards with target of zero emissions for future offices/buildings 	No further change proposed. Please see Chapter 2, climate change, for the focus on reusing before rebuilding and the use of LETI standards
28	Love Wimbledon	02 Climate Change		<ul style="list-style-type: none"> Less of an emphasis on redevelopment but organic improvements 	No further change proposed. Please see Chapter 2, climate change, for the focus on reusing before rebuilding and the use of LETI standards
28	Love Wimbledon	02 Climate Change		<ul style="list-style-type: none"> Improve green spaces and places – include reference to the climate emergency plans 	No further change proposed. Please see the objectives, vision and Chapter 2, climate change, chapters on green and blue infrastructure, flood risk, places and spaces for a growing borough and throughout the plan for the extensive reference to climate emergency plans and lowering carbon
28	Love Wimbledon	09 Wimbledon		<p>Although supportive of the essence of the plan on Wimbledon's economy, jobs, development investment and growth, we ask that more emphasis is placed on improving the Wimbledon experience in a 'living with' covid world for all visitors whether local or international</p>	Noted
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> Support for improvement of digital inclusion 	No further change proposed.
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> A strategy for the station improvements without Crossrail going ahead 	No further change proposed. Please see policy 09.1 Wimbledon, which is based on Crossrail2 not being developed in the lifetime of this local plan
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> An emphasis on supporting shops, especially independents 	No further change proposed. Please see policy 9.1 regarding retail in Wimbledon. The planning system cannot consider the owners of shops in making planning decisions
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> Less of a focus on conference facilities and hotels (unless independent) 	No further change proposed. Please see policy 9.1 regarding hotels and conference facilities in Wimbledon. The planning system cannot consider the owners of premises (i.e. chains or independent) in making planning decisions
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> A vision to include an arts centre in the town centre 	No further change proposed. Please see policy 9.1 regarding art and culture facilities in Wimbledon.
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> A town centre which conserves its historical architectural interest whilst creating high quality developments 	No further change proposed.
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> Improve its experiential reputation as an internationally recognised location with spaces and places which support that 	No further change proposed. Wimbledon's international and national reputation is recognised in the plan
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> Landlord charter to engage with all landlords for the future of the town – share responsibility and curation for the future of the town 	No further change proposed
28	Love Wimbledon	09 Wimbledon		<ul style="list-style-type: none"> Make sure commercial properties and the town centre provide cycling facilities and accessible pathways for people cycling to and through the town centre making Wimbledon a cycling friendly town 	No further change proposed. Deliveries and servicing is considered in Chapter 16 Sustainable Travel
28	Love Wimbledon	09 Wimbledon		<p>A clear policy for the town centre, including its conservation areas, on shop signage and active frontages including hoardings and unoccupied shops</p>	No further change proposed. Please see policy 9.1 Wimbledon
28	Love Wimbledon	16 Sustainable Travel		<ul style="list-style-type: none"> A stronger focus on air quality and traffic improvements within the town centre, particularly for through traffic and delivery bikes 	No further change proposed. Deliveries and servicing is considered in Chapter 16 Sustainable Travel
28	Love Wimbledon	16 Sustainable Travel		<ul style="list-style-type: none"> Clearer vision on how to manage the delivery industry in green and sustainable way 	No further change proposed. Deliveries and servicing is considered in Chapter 16 Sustainable Travel
29	Merton Centre for Independent Living (MCIL)	All		<p>The term 'inclusive' is supported, however it's definition is not clear. Be explicitly clear what the term 'inclusive' means up front to help frame all policies that address inclusivity.</p> <p>MT response. I would suggest something like 'when we refer to access and inclusion we are referring to all sections of the community, and recognise that access is a particularly important issue for Deaf and Disabled people and that all references to access in the plan should be taken as referring to full disability access.'</p> <p>Adjust policies (in particular design policies) to be consistent in their approach when addressing people with disabilities.</p> <p>There is an emphasis on dementia due to the council's ambitions, however singling out a specific group may not be beneficial for other groups. Make explicit that dementia friendly approaches benefit other groups also if relevant, or review whether the policy needs to specifically address dementia.</p> <p>There are concerns with the access of taller buildings due to the reliance on lifts and their maintenance. Add a note to the justification text. Also mention that wheelchair accessible homes are better placed on the ground and lower levels.</p> <p>Public space also requires maintenance to ensure foliage is cut back and not obstructing footpaths that can hinder movement. This can be mentioned in the justification text also.</p> <p>Further investigations are required about the practicalities of 20 minute neighbourhoods for deaf and disabled people.</p> <p>The wording of 'improvements that enable people to walk as part of their everyday lives no matter how limited their personal and physical abilities are' to be rephrased, please see CIL's stage 2a response for further details.</p> <p>MCIL are happy to be recommended to assist on the direction of future large development projects, however do not directly provide technical guidance subject to resource/capacity.</p>	<p>The policy wording has been reviewed and amendments have been made.</p> <p>Future development must cater for all sections of the community, and as such the policy wording has been amended to better represent this.</p> <p>Policy D12.1.f and D12.2n signposts to the relevant Health and Wellbeing chapter that provides further policies that support accessible and inclusive development. Furthermore, justification text 12.1.4 has been added to better define what is expected from an inclusive environment.</p> <p>Policy D.12.3.1 has been amended to signpost to London Plan Policy D7 'Accessible Housing' and Building Regs M. Added further justification text to policy 12.3 to signpost London Plan policy D7 'accessible housing' and Part M</p>
30	Merton Conservative Group	11 Housing	H11.2	<p>This Local Plan represents the further 'Croydonisation' of Merton by an out of touch Labour administration that has refused to listen to local residents and plan for the needs. After 11 years of Labour running the council the right homes for Merton residents have still not been delivered. We need a strong focus on building family homes and not tower blocks.</p>	No further change proposed. Policy H11.2 has been prepared in accordance with the NPPF requirements, including those concerning engagement and consultation with local residents, stakeholders and interested parties in the preparation of local plans. The GLA have confirmed that the draft Local plan is in conformity with the London Plan.
30	Merton Conservative Group	Policies Map	Policies Map	<p>We strongly oppose the removal of open space designations and call for this policy to be changed.</p>	<p>This submission is not clear on which site/s it is objecting to. If this is referring to all open space designation changes on the Policies Map, all changes have been undertaken in accordance with a set of criteria as outlined in the Green Infrastructure Study 2020 and each site was subject to a review both by The Environment Partnership as part of the Green Infrastructure Study and also by officers.</p> <p>Through this process, some changes to the open space boundaries have been made for a variety of reasons, including those sites that have received planning permission. Changes have been made both to remove open spaces and add new open spaces.</p> <p>NPPF 98 sets out that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities. The Green Infrastructure Study and Playing Pitch Strategy were both prepared as evidence for the Local Plan.</p> <p>Officers do not propose any further changes</p>

31	Merton Cycling Campaign	16 Sustainable Transport	T16.1		T16.1 notably omits any mention of the need to provide new high quality infrastructure in a network which is of sufficient quality and continuity to achieve Merton's active travel goals. At a minimum any new or upgraded infrastructure should meet the current DfT or TfL guidance that is of the highest standard at the time (e.g. LTN 1/20 and other such guidance that may be published during the lifetime of the Local Plan)	Policy 16.2 and the supporting text expands in more detail on strategic policy 16.1 and has had various amendments. It is considered that this adequately covers the need to provide cycle infrastructure in accordance with best practice guidance.
31	Merton Cycling Campaign	16 Sustainable Transport	T16.1 (c)		The implementation of a comprehensive network of safe and convenient cycle route as promised in Policy T16.1 (item c.) and TN12 is undermined by Merton's lack of a Walking and Cycling Strategy and their being no reference to it, or a map of a planned network with a hierarchy of high quality routes.	Policy 16.2 and the supporting text expands in more detail on strategic policy 16.1 and has had various amendments including a reference to the development of cyclign and walking strategies and cycle network map.
31	Merton Cycling Campaign	16 Sustainable Transport	Cycling Map		It is unclear what the network map at Stage 3 - Transport Policies Map – Cycling map represents. There is no meaningful key, all the "cycle network" is the same colour and there is no attempt to distinguish between route sections that are LTN1-20 compliant, sections that have some cycle infrastructure, and sections that have nothing at all and are in some cases outright dangerous. There is also no indication of whether they are existing routes to be protected/enhanced through development, or whether they are no routes to be brought forward by development through the life of the plan. Without greater clarity in this area the Plan risks being unable to control development in a way that sees it meet the objectives of the Plan. Until Merton has a viable cycle transport policies map (expected to be developed by 2023) the Local Plan should include the existing LIP 3 cycle policies map to ensure that development can be guided to contribute to a strategic and planned network. The Local Plan maps should also include the London Mayor's Transport Strategy's 'Priority Connections' for a London wide cycle network identified in Merton for completion by 2041.	Comment noted and agreed that more clarification is needed on what is shown on the map. Paragraph 16.2.6 has been added to the supporting text to provide more explanation and text has also been added to the map itself.
31	Merton Cycling Campaign	16 Sustainable Transport	T16.2		The Plan is also deficient in that there is no attempt to explain how the TfL "Healthy Streets" approach reference at T16.2 relates to this map or how Low Traffic Neighbourhoods fit it. For example, looking at Merton Park, Kenley Road, Dorset Road Mostyn Road, Cannon Hill Lane are identified as cycle routes, but these currently have high traffic levels and considerable hazards. They are nowhere near LTN1-20 compliant. Without a coherent plan that sets out how such roads can be improved to bring them up to LTN1-20 compliance, it is impossible to assess how a development might contribute to the network, or how, for example, a school travel plan that involves significant levels of cycling would be credible	Comments noted. Chapter 16, Sustainable Transport policies requires all sites to prioritise active travel access.
31	Merton Cycling Campaign	16 Sustainable Transport			The Local Plan maps should also include the London Mayor's Transport Strategy's 'Priority Connections' for a London wide cycle network identified in Merton for completion by 2041.	Comments noted. The map does include these routes although they are not identified.
31	Merton Cycling Campaign	16 Sustainable Transport			Policy T16.2 of Merton's New Local Plan Publication Stage 3 promotes prioritising active travel choices. The justifications include the target in the London Mayor's Transport Strategy for all Londoners to do at least 20 minutes daily active travel by 2041, and Merton's relatively small size with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling, creating a significant opportunity for more cycle and walking journeys. The statement that Merton has "a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling" is quite simply, untrue. The cycle routes are largely of low quality and cannot be said to make locations "easily accessible". The routes identified in the map Stage 3 - Transport Policies Map – Cycling are mainly roads with no cycle facilities at all, and with significant hazards, high volumes of traffic and high traffic speeds, and not compliant with LTN1-20. (Please see our separate comments on this map.	Noted. Significant amendments of supporting text for T16.2, para's 16.2.3- 16.2.6 proposed, including remove the statement "a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling" and to clarify that improvements are required to the cycle network.
31	Merton Cycling Campaign	16 Sustainable Transport			Policy T16.2 acknowledges that currently a third of Merton residents do 20 minutes of active travel a day and that there has been a slight decline over the last five years. Of the daily trips 30% are conducted by walking but less than 2% are by bicycle. When proper, cohesive, well-designed opportunities for cycling are made available this will immediately attract cycling - if less than 2% of daily trips are by bicycle it is entirely because there are inadequate opportunities for more cycle journeys because there is inadequate infrastructure. This was confirmed in the Cycle Skills Audit commissioned by Merton in 2012 which said the provision was patchy; it is still patchy and will remain patchy if left to random contributions from private development.	Noted. Significant amendments of supporting text for T16.2, para's 16.2.3- 16.2.6 proposed to clarify that improvements are required to the cycle network.
31	Merton Cycling Campaign	16 Sustainable Transport			T16.1 and/or T16.2 should make specific reference to favouring development that enables, contributes to or makes provision for, the transformative removal of gyratories in town centres, as identified as an objective in other parts of the plan. Without this, or explicit reference to a walking and cycling strategy that seeks to create 'Liveable Neighbourhoods' there is no way Merton can expect to meet its active travel, health and well-being or climate change objectives.	Noted. New paragraph 16.2.6 mentions the removal of the gyratories.
31	Merton Cycling Campaign	16 Sustainable Transport			T16.2 a & b – in order for development to deliver a Healthy Streets approach development sites should be required to create new Low Traffic Neighbourhoods through and around them, in line with a Cycling Network Strategy for the borough, not just integrate with existing infrastructure or routes when it is already in existence.	Noted. Minor modification of wording proposed to paragraph 16.2.10
31	Merton Cycling Campaign	16 Sustainable Transport			The justification for Cycle and Pedestrian networks at 17.2.4 – 17.2.6 should be clearer that there is also an equality issue - inadequate cycle routes are discriminatory against women, older people, children and others. All new infrastructure needs to be LTN1-20 compliant and existing infrastructure must be upgraded to such standards as soon as possible.	Noted.
31	Merton Cycling Campaign	16 Sustainable Transport	Policy T16.4		T16.4 a should be specific about what constitutes "good" public transport accessibility for a site to ensure there is no ambiguity when development proposals are brought forward. Any development sites with a PTAL of 5/6a/6b should be care free, in line with London Plan guidance.	Agreed. Para 16.2.4 of the supporting text has been amended in accordance to specify: "In accordance with London Plan standards, all developments with a PTAL rating of 5- 6 must be car free
32	Merton Park Ward Independent Residents (MPWIR)	12 Design	D12.10		DAMAGE TO THE PUBLIC REALM DUE TO CONSTRUCTION ACTIVITY In the previous consultation we proposed an additional paragraph for Policy D5.3 a) xiv: Construction Activity that we cannot see has been included in the present draft. In stage 3, we should like to see it as an additional paragraph to Policy D12.10 "Where damage to roads, pavements, crossovers, and other items of infrastructure in the public realm can be shown to have been caused by development work, the Council may seek to recover the cost of repairs from the site owner. It would be the responsibility of the site owner to recover such costs from their contractors if that was appropriate. To prove the condition of the relevant public realm prior to commencement, the Council may require photographs to be provided by the site-owner as a condition of permission to commence."	New policy added to D12.2 (w) to address this matter.
32	Merton Park Ward Independent Residents (MPWIR)	Morden tall buildings	Morden		There are striking contextual similarities between the two tallest buildings in Merton, the Civic Centre in Morden and Britannia Point in Colliers Wood. Both were constructed more than 50 years ago, with little regard for their surroundings at the time. Both may justifiably be described as pinnacle buildings in their respective town centres, and should remain so. In the case of Britannia Point, the policy for Colliers Wood (N3.1) states explicitly that "Britannia Point should remain the pinnacle building in the centre in terms of height". There is no comparable policy to define the role of the Civic Centre in Morden, despite plans for major regeneration of the town centre. The Civic Centre is located at the heart of the Wider Morden Town Centre Area, immediately south of site Mo.4. If Morden is to retain its sense of place, its regeneration should be anchored in the context of a landmark building that has defined the skyline of the town centre for over 50 years. Drawing on the policy for Britannia Point, the following addition is proposed after 5.11.36 (p.185): "Morden town centre may be an appropriate location to accommodate higher density development including tall buildings. The Civic Centre should remain the pinnacle building in the town centre in terms of height. This can then form the basis for a coherent group of buildings that relate well to each other in terms of scale, massing, form and architecture."	The proposed wording in the supporting text is not necessary to make the plan sound. The Morden Town Centre Visual Impact Assessment (2020), which uses the 3D model of the Hawkins Brown Strategic Development Framework as an indicative option that has a cluster of tall buildings with the tallest being 22 storeys, finds that it would not result in any likely adverse townscape and visual effects. Proposed Major Modification MM3.1 requires a proposals to be in accordance with the details in the Strategic Heights Diagram for the Morden Regeneration Zone and the supporting text points out that the proposed height for each building within the Morden Regeneration Zone will need to be justified in accordance with the criteria in policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'.
32	Merton Park Ward Residents Association (MPWRA)	05 Morden	Neighbourhoods Map	P76,106, 171, 214,250,262,350	We are grateful for your continuing professional approach to all the amendments we have requested. We feel there are a few matters where we should still like your attention: MAPS INCLUDING MERTON PARK – OMISSION OF WATERY LANE AND NORTH WEST CORNER We were very pleased to see the John Innes (Wilton Crescent) Conservation Area and John Innes (Merton Park) Conservation Area included as part of Merton Park in terms of character and the John Innes, Garden Suburb, history. On closer examination of the map on page 171 of the Draft Local Plan Stage 3 we note that Watery Lane and Manor Gardens have been missed off the map of Merton Park even though they are in the John Innes (Merton Park) Conservation Area. We should like to see this corrected.	No further change proposed. The representation refers to the sub-areas and neighbourhoods illustrated, which are derived from Merton's borough character study 2021. Merton's Borough Character Study SPD 2021 carefully considered the characteristics of Wimbledon Chase and Merton Park and the responses to the public consultation, which amended the boundary to the north in response to public consultation feedback. The Borough Character Study considered a wide range of characteristics including socio-economic, topography, physical and natural, the way the area functions, the way the community use and feel about the area as well as built and historical character. This means that boundaries for the smaller neighbourhoods (e.g Wimbledon Chase and Merton Park) don't always align with historic conservation area boundaries

32	Merton Park Ward Residents Association (MPWRA)	05 Morden	Neighbourhoods Map	P76,106, 171, 214,250,262,350	<p>The Stage 3 Heritage Policy Map 3 shows the Borough's conservation areas and, there, the Merton Park (John Innes) Conservation Area is correctly shown to include Watery Lane and Manor Gardens.</p> <p>Both streets form part of the John Innes Estate (and Garden Suburb), indeed John Innes's home, The Manor House, is on Watery Lane (now used as part of Rutlish School).</p> <p>While this is being looked at we should very much appreciate it if the following streets could be included in the map of Merton Park, as they are within the boundaries of the John Innes Estate and Garden Suburb.</p> <ul style="list-style-type: none"> Manor Road, Cleveland Avenue, South side of Kingston Road, from Watery Lane to Cannon Hill Lane (includes Merton Rush, Merton Park Parade and Nelson Health Centre) Easterly (Merton Park) side of Cannon Hill Lane from Kingston Road to Aylward Road <p>We should be grateful if all the above could be corrected/amended on page 171 and the following other pages/places where this map or similar is shown: P76,106,214,250,262,350 Stage 3 Policies Map – Neighbourhoods.pdf Stage 3 Policies Map – Neighbourhoods - Morden.pdf Stage 3 Policies Map – Neighbourhoods – Raynes Park.pdf Stage 3 Policies Map – Neighbourhoods - Wimbledon.pdf</p>	No further change proposed. The representation refers to the sub-areas and neighbourhoods illustrated, which are derived from Merton's borough character study 2021. Merton's Borough Character Study SPD 2021 carefully considered the characteristics of Wimbledon Chase and Merton Park and the responses to the public consultation, which amended the boundary to the north in response to public consultation feedback. The Borough Character Study considered a wide range of characteristics including socio-economic, topography, physical and natural, the way the area functions, the way the community use and feel about the area as well as built and historical character. This means that boundaries for the smaller neighbourhoods (e.g Wimbledon Chase and Merton Park) don't always align with historic conservation area boundaries
34	Merton Residents Transport Group	05 Morden	N5.1	5.1.24:	Update wording to include: "Improvements to the cycle network are also required to improve connectivity with key destinations"	No change proposed. The need to improve the cycle network is covered adequately in para 5.1.52:
34	Merton Residents Transport Group	05 Morden		5.1.52:	Update wording to include: "It is therefore vital that Morden is well connected to the surrounding neighbourhoods and beyond by a network of safe and convenient pedestrian and cycle routes. Cycling infrastructure must meet LTN 1/20 or any replacement"	No change proposed. Requirements to provide cycle infrastructure in accordance with latest best practice including LTN 1/20 is covered adequately in the chapter 16 Sustainable Transport para 16.2.7
34	Merton Residents Transport Group	05 Morden	Mo5		Infrastructure requirements should include prioritising active travel access	Comments noted. Chapter 16, Sustainable Transport policies requires all sites to prioritise active travel access.
34	Merton Residents Transport Group	06 Raynes Park	N6.1		Paragraph c: Suggested update: "Securing well-designed and well linked improvements for pedestrians and cyclists and improved access to public transport facilities, including <u>connecting the Coombe Lane cycle route to Kingston Road, Wkye Road, and Lambton Road, adding additional pedestrian crossings, and support for step-free access and improved secure cycle parking facilities at Raynes Park station.</u> "	No change proposed to include the specific transport schemes in the policy as the schemes will require further investigation to assess feasibility. The suggestions have been noted and will be considered further in the development of transport strategies including walking and cycling strategies.
34	Merton Residents Transport Group	06 Raynes Park			Note: specific suggested pedestrian crossings required: <ul style="list-style-type: none"> Cannon Hill Lane near junctions with Cherrywood Lane and Eastway Coombe Lane at junction of Cambridge Road (parallel crossing to allow safe access from Cambridge Rd to the existing two-way cycle track and bus stop) Durham Rd - to north, in middle point (near Cambridge Rd) and to the south near Coombe Lane. Copse Hill to connect to Barham Road, Drax Avenue and Ernie Roads. Grand Drive, multiple possible locations Crossway between Westway and West Barnes Lane West Barnes Lane near Arthur Road and near Linkway 	Suggestions noted and will be considered further in the development of transport strategies including walking strategy.
34	Merton Residents Transport Group	06 Raynes Park		6.1.15	[...] While Crossrail 2 remains at the planning stage, we will continue to seek greater investment in all stations and surrounds <u>in advance of Crossrail delivery</u> , particularly step free access which will remove the barrier that currently exists for public transport access to all sections of the community" Rationale: The ongoing delays for Crossrail 2 mean we can no longer wait for delivery of Crossrail 2 before providing step-free access at Raynes Park station	No change proposed. Rationale noted and agreed, but it is not considered necessary to amend the policy wording as proposed as the existing wording already allows for this .
34	Merton Residents Transport Group	06 Raynes Park	RP3		Suggested amendment to Design and Accessibility Guidance: "Development of the site should <u>include improvements to public access to</u> the currently overgrown and inaccessible Pyl Brook on the northern boundary of the site (Pyl Brook) <u>and open this up as a greenway for pedestrians and cycles</u> " Rationale: This would help to address the deficiency in access to nature noted in the site guidance and create a new access link	Agreed. Wording amended to: "Development of the site presents an opportunity to improve the currently overgrown and inaccessible <u>Pyl Brook area</u> on the northern boundary of the site (<u>Pyl Brook</u>) <u>and provide public access for pedestrians and cyclists.</u> "
34	Merton Residents Transport Group	07 South Wimbledon	N7.1		Suggested rewording for Paragraph i: "Support improvements to the transport infrastructure that will help to improve the public realm, and improve safety and accessibility for pedestrians and cyclists, including the provision of segregated cycle facilities" Rationale: The policy as stated leaves open the possibility of expanding road capacity in the guise of "reducing road congestion"; in reality Induced Demand arising from such measures would likely lead to an increase in vehicles travelling and a return of congestion following an initial period of relief	No change proposed. Rationale noted and agreed, but suggested rewording is not considered necessary as expansion of road capacity is not the intention, is not likely to be feasible and would be in contradicted to sustainable transport strategic policy 16.1. Options for the provision of segregated cycle facilities will be considered in the forthcoming cycling strategy but will require more feasibility assessment in consultation with TfL.
34	Merton Residents Transport Group	09 Wimbledon	N9.1		New paragraph following existing Paragraph h: "Managing and reducing the amount of vehicle traffic in Wimbledon town centre so as to reduce the levels of pollution and create a more pleasant and vibrant town centre" New paragraph following existing Paragraph i: "Seeking to improve the pedestrian and shopping environment in Wimbledon town centre by removing vehicle traffic from The Broadway between Queen's Road and Gladstone Road, with vehicles re-routed via Hartfield Road	Agreed with the need to clarify that the transport strategy for Wimbledon will include reducing traffic dominance and improve the pedestrian/ shopping environment. Amendment to insert the following additional paragraph I to policy N9.1 . Amendment also incorporates comments from Love Wimbledon in relation to reducing traffic dominance and managing deliveries/ freight. I. Creating a more pleasant environment for shopping and leisure activities in by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions.
34	Merton Residents Transport Group	09 Wimbledon	N9.1		New paragraphs following existing Paragraph q: "Promoting and supporting the need for sustainable, environmentally friendly development in the Plough Lane area to ensure that traffic levels are managed to improve local health and wellbeing and that incoming businesses contribute to a high-quality retail and leisure offering." "Constraining activities that are environmentally unfriendly, pollution generating, or yield high volumes of HGV traffic in industrial estates in the Wimbledon area where the surrounding area is largely residential. Encourage relocation of activities which generate high levels of HGV movements through Wimbledon centre."	No changes proposed.
34	Merton Residents Transport Group	09 Wimbledon		9.1.30	More explicit support for step-free access at Haydons Road station should be stated.	No change proposed. The Council is strongly supportive of step free access at Haydon's Road Station and is already progressing this via a route secured through enabling development.
34	Merton Residents Transport Group	09 Wimbledon	Site allocation Wi3		esign and Accessibility guidance should be amended as follows: "Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian <u>and cycle</u> access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's "heritage at risk" register by AELTC (former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park" Rationale: The site presents an opportunity to create a new access route from Church Road to Wimbledon Park, improving accessibility to green space and creating new active travel routes to/from Wimbledon Village	Agreed. Amendment made as proposed.

34	Merton Residents Transport Group	09 Wimbledon	Site allocation Wi16		Site Wi16 Design and accessibility guidance: We do not support the construction of a road bridge between Queen's Road and Alexandra Road; we would, however, support the construction of a ramped, segregated pedestrian and cycle bridge at this location. A new road bridge would be inconsistent with the Mayor's transport strategy to increase journeys made by foot, cycle or public transport to 80% by 2041	Major modification proposed to remove reference to road bridge over the railway as this would need to be enabled by Cross rail 2 which is unlikely occur in the plan period. They must also look to facilitate a potential road bridge linking Queen's Road and Alexandra Road to the rear of the site.
34	Merton Residents Transport Group	16 Sustainable Transport	T16.1		New paragraph following existing Paragraph b: "Develop and extend the use of Low Traffic Neighbourhoods and School Streets, working closely with local interests in the creation and evolution of schemes beforehand" New paragraph following existing Paragraph c: "Ensure that we make the most of existing and new active travel infrastructure with a planned programme of maintenance that addresses surface quality issues and cuts back overgrown vegetation that can significantly narrow routes"	No change proposed. T16.1 is a strategic policy and it is not considered necessary to insert the proposed additional paragraphs that cover more detailed points related to implementation. Some of the issues raised such as vegetation maintenance are operational issues and others such as LTNs are covered in the supporting text for T16.2.
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2		New paragraph following existing Paragraph c: "Ensure new infrastructure is of sufficient quality to achieve Merton's active travel goals by mandating that with all new pedestrian or cycle infrastructure must meet or exceed current DfT guidance (e.g. LTN 1/20 and other such guidance that may be published during the lifetime of the Local Plan)"	No change proposed. The need to provide cycle and pedestrian infrastructure in accordance with DfT guidance is adequately covered in amended supporting text para 16.2.7
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2	17.2.4:	17.2.4: Changes to cycling infrastructure must meet LTN 1/20 or any subsequent replacement	No change proposed. The need to provide cycle infrastructure in accordance with DfT guidance is adequately covered in amended supporting text para 16.2.7
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2	17.2.5	Update wording to say "Development proposals must maximise opportunities..."	Agreed. Wording strengthened to replace "should" with "must".
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2	17.2.6:	Update wording to say "Development layouts must be designed to give priority to pedestrian and cycle movements and must facilitate access to public transport networks. Pedestrian and cycle routes must be provided to a high standard in accordance with the latest best practice guidance (Cycle infrastructure design (LTN 1/20))"	Agreed. Wording strengthened to replace "should" with "must". Other amendments also made to this paragraph.
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2	17.2.7	Update wording to say: "We have adopted TfL's healthy streets approach, which puts people's health at the centre of how streets and public spaces are designed, managed and used. Developments will be expected to demonstrate how their proposals will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. New streets must respect and link to the local neighbourhood they serve and provide good connections to community facilities and shops, promote improved travel choice by creating an attractive, permeable, well designed and balanced environment"	Agreed. Wording strengthened to replace "should" with "must".
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2	17.2.9	Update wording to say: "Low traffic neighbourhoods are local streets where through traffic is restricted to reduce car dominance and create safe and pleasant street environments that enable cycling and walking. Merton already has in place successful and longstanding low traffic neighbourhoods and streets in several areas of the borough particularly around Colliers Wood and South Wimbledon. As part of the Healthy Streets Approach, new development should adopt the principles of low traffic neighbourhoods and filtered permeability into the site layouts and to integrate with any existing schemes."	Agreed. This paragraph has been amended in response to another comment and now reads: As part of the Healthy Streets Approach, new development should adopt the principles of low traffic neighbourhoods and filtered permeability into the site layouts and to integrate with and contribute towards any new or existing schemes on the surrounding street network.
34	Merton Residents Transport Group	16 Sustainable Transport	T16.2	17.2.10	17.2.10: Update wording to say: "To enable more people to take up or continue to cycle it is important that a sufficient quantity of high-quality cycle parking is provided within new developments in accordance with the higher-level requirements set out in the London Plan. Cycle parking must be easy to access in a convenient location within a development, at ground level wherever possible. The facilities must be secure, covered and be suitable for people of all ages and abilities, including those who might experience difficulties in lifting a bike or need a specialist cycle. Development proposals must provide full layout drawings prior to the determination of application, demonstrating that it is possible and easy to manoeuvre bicycles both to and within the proposed cycle parking facilities. In places of employment, supporting facilities must be provided including changing rooms, maintenance facilities, lockers and shower facilities (at least one per ten long-stay spaces)."	Agreed. Wording strengthened to replace "should" with "must".
34	Merton Residents Transport Group	16 Sustainable Transport	T16.3	17.3.8	Suggested new paragraph after 17.3.8: "On roads without segregated cycle infrastructure they can also increase risk to vulnerable road users and discourage people from making active travel choices."	No change proposed. The danger of heavy vehicles to vulnerable road users is covered in para 16.3.6
34	Merton Residents Transport Group	16 Sustainable Transport	T16.3	17.3.12:	Add: "Major events should additionally be required to provide cycle storage for attendees."	No change proposed. The need for cycle storage for all uses is addressed in policy T16.2
34	Merton Residents Transport Group	16 Sustainable Transport	T16.4		Paragraph a: We would encourage Merton to be more explicit as to what constitutes "good" public transport accessibility, to remove any potential ambiguity. PTAL 5/6a/6b should be car free, in line with London Plan guidance	Agreed. Para 16.2.4 of the supporting text has been amended in accordance to specify: "In accordance with London Plan standards, all developments with a PTAL rating of 5- 6 must be car free"
34	Merton Residents Transport Group	16 Sustainable Transport	T16.4		Paragraph b: The wording here is somewhat ambiguous; suggested alternative wording: "All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free, with residents in the new development ineligible for parking permits"	Agreed. Paragraph b of policy T16.4 expanded as follows: "All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free, with occupants being ineligible to apply for on-street parking permits. "
34	Merton Residents Transport Group	16 Sustainable Transport	T16.5	17.5.16:	Suggested clarification: "Where the proposed cycle network includes pedestrian links where cycling is currently prohibited and cyclists are required to dismount, we will seek to enhance the route to safely accommodate cyclists and consider a "share with care" approach where separate facilities are not feasible	This has been deleted from the supporting text from policy T16.5 and amended and relocated to policy T16.2 paragraph 16.2.6.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			Key objectives 19. We welcome the proposed Key Objectives. To meet the soundness test they will only be effective if they are further strengthened better to reflect and deliver the overall Spatial Vision and Objectives of the Plan including by: <input type="checkbox"/> Stronger centre—addressing pollution and public safety considerations in the village centre and the priority to improve the market and provide more opportunities to socialise <input type="checkbox"/> Community—addressing the importance of protecting and enhancing existing community buildings and other assets and increasing their number <input type="checkbox"/> Celebrating heritage—addressing natural heritage as well as historic environment and amending the incorrect reference to "Canons House" to "The Canons" (see entry on Historic England's National Heritage List) which is incorrectly used throughout the Plan	No further change proposed to Mitcham's key objectives (a stronger Mitcham town centre; supporting community; celebrating heritage)
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	N4.1		Chapter 4 Mitcham Mitcham Village 17. Recognition of Mitcham as having a "village" and not a "town" centre needs to be central to the Plan if it is to provide an appropriate response that recognises Mitcham's intrinsic character as the starting point for considering future development. It was agreed by the Borough Plan Advisory Committee on 26 November 2020 to identify "Mitcham Village" in the Borough Character Study. The current Plan makes 28 separate references to "Mitcham town" which need to be changed to recognise Mitcham as a "village" centre. 18. It has been suggested that Mitcham must be identified as a "town centre" as a result of its classification in the London Plan. We note that this identifies it as a "district centre" (Table A1.1) and identifying its village qualities is not inconsistent with this approach. There is a good parallel with Carshalton Village and Cheam Village in Sutton which are identified in the London Plan as such and as a "district centre". London Plan Policy SD8 also recognises the role of Local Plans in bringing forward changes to District Centres.	No further change proposed. Mitcham and Morden are defined as District Centres in the London Plan and successive Local Plans. This Local Plan does not propose a definition of Mitcham Village and a "village" definition is not present in the London Plan. Should businesses and residents wish to rename their town centre, this is not a planning matter and can take place outside the Local Plan process.

35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	N4.1		Policy N4.1 20. To be effective Policy N4.1 needs to address the priorities for community investment, including local community assets, the need for a much strengthened cultural offer and improvements to public health. The significant number of independent shops and food outlets which reflect the cultural diversity of Mitcham and the opportunities presented by the longstanding street market also need to be more clearly recognised, protected and enhanced. This should be informed by a retail study examining the diversity of uses and the influences on Mitcham's vacancy rates and economic fortunes. To be consistent with the rest of the Plan the Policy should also support "neighbourhood parades" and not "local parades".	Additional modification to clarify (p) Support and improve the quality of local NEIGHBOURHOOD parades
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	N4.1		21. We do not consider the boundary of Mitcham's village [town] centre to be justified. We believe Mitcham has many of the characteristics of a 20-minute neighbourhood, including the historic distinction between Upper and Lower Green and their provision of distinct commercial and civic functions. An effective boundary needs to reflect this twin centre and extending from the southern end of Figges Marsh to Mitcham tram stop, with the retail core focused on the village centre around Fair Green. This would be consistent with the broad boundary of the "urban village" agreed in Merton's prescient Unitary Development Plan in 2003 and described as "A mixed use neighbourhood with a maximum walking distance of 10 minutes to its centre". This approach should be incorporated in an amendment to the boundary of Mitcham as a District Centre in the Economy section of the Plan and reproduced in the Mitcham section.	No further change proposed. Further extensions of Mitcham's proposed town centre boundary to a much wider area from Figges Marsh in the north to Mitcham Tram Stop south of Cricket Green to the south would include a substantial extent of uses that would generally not be found in a town centre and would not be justified.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	N4.1		22. The relationship of the area-based policies with the topic-based policies in the Plan needs to be made much clearer, including the location of the village centre, shopping parades, scattered employment sites and other considerations. This is part of a wider concern about the confusing and uncertain structure of the Plan.	The plan is clearly set out to identify the six neighbourhoods and relevant site allocations, alongside the other topic based policies. All policies are to be considered together in the assessment of planning applications, in addition to the Policies Maps. No changes proposed.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	N4.1		23. To be effective revised Policy N4.1 should provide a much stronger and place-specific expression of the Local Plan's Strategic Vision and Objectives as they apply to Mitcham, embracing other parts of the Plan and including: 1. Identifying the specific examples of social and community infrastructure in Mitcham for the purposes of Policy IN14.2 without restricting the Policy to these assets: □ Mitcham cricket pavilion and shed (including its operational land) – this has been formally recognised as Merton's first Asset of Community Value □ Mitcham cricket ground □ Burn Bullock public house □ White Hart public house □ The Windmill public house □ Vestry Hall – community meeting/function rooms, voluntary and community organisations' offices & services □ Wandle Industrial Museum – community run registered museum □ Mitcham Parish Centre – community meeting/function room and outdoor space □ Mitcham Parish Church – community uses □ Elmwood Centre (Age UK) – voluntary organisation offices and services, community meeting/function room □ Glebe Court Scouts Hall – community meeting and event space □ Mitcham Bowls Club – community sports facility □ Mitcham Community Orchard – community growing and outdoor space □ New Mitcham Fire Station (with community room) □ The Canons basement, community room and community café □ Sts Peter & Paul Catholic Church – community meeting/function room □ Methodist Church – community uses □ The Ecology Centre, Mitcham Common □ Sporting and meeting facilities in local schools with community agreements	Policy IN6.2 sets out how community assets are to be protected and the requirements for any sites that may be proposed for other development. Some of the sites mentioned here may also be designated on the Policies maps, such as open spaces and playing pitches. Officers do not consider that repeating policies on social and community infrastructure would be appropriate in the area policies. No changes proposed.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			2. Adding the neighbourhood parades in Mitcham listed after paragraph 13.5.33 to support delivery of the Strategic Objective for "supporting.....neighbourhood parades" and Policy N4.1's commitment to "local parades" and to support Policy TC13.5 on neighbourhood parades plus adding the following important parades which are missing from inventory provided after paragraph 13.5.33: □ Bramcote Parade – provides an important community facility on the ground floor of a coherent set of buildings added to the Local List in 2017 and which is currently the focus of CIL investment to improve the shopfronts □ London Road – five short parades which combine to provide a significant community facility. The parades along the south east side of London Road provide particular opportunities for public realm improvements with a wide pavement, bus stop, dilapidated building and opportunities for planting – only 323-327 is recognised in the Plan (following earlier representations) □ Monarch Parade – an important stretch of retail units on London Road opposite Mitcham Library	No further change proposed. The presence of neighbourhood parades has been reviewed to ensure that their function is to serve the local community, particularly with convenience shopping. The additional parades listed may have functional and historic merit but are not justified in being added to the list of neighbourhood parades. As with Bramcote parade, this is not a barrier to the council investing separately in their upkeep.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			3. Identifying protection of the following local employment sites in Mitcham as being "scattered employment sites" for the purposes of Policy EC13.1: □ 1-4 Lower Green West & 342-344 London Road – the site of London Box Sash Windows and the Old Bank House this site includes a complex of workshops and a long manufacturing heritage that should be continued □ Units on 339 London Road & 12 Cricket Green – this area has a long tradition of car repairs, servicing and engineering along with office/training use (former Kiara College) that should be protected.	No further change proposed. The local plan does not identify specific scattered employment sites.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			24. To be effective Policy N4.1 should be further strengthened specifically to identify the frontage to the green space bounded by Cricket Green and London Road as an area of special streetscape and heritage significance where any new development must be of exceptional design and be capable of being listed within 30 years.	All sites that are significant in open space and heritage terms are identified in the Policies maps. No changes proposed.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			25. Additionally, for the Plan to be justified the supporting text should: □ Reference The Canons Conservation Management Plan which was adopted as a supplementary planning document in 2017 □ Provide evidence or otherwise delete the claim that the Rediscover Mitcham investment has "helped drive extra footfall to businesses around the Fair Green" as this is highly contested and we are unaware of any baseline being surveyed or impact studies being published which allows this assertion to be evidenced and have not been provided with them when requested □ Be consistent in referring to "The Canons" or "The Canons house" and not "Canons House" □ Recognise the Wandle Vistas in Mitcham and reference the award winning research as part of the evidence base – the report won the RTP1's 'Excellence in Plan Making Practice' award in 2019 but has not been addressed in the Plan	Additional modification to refer to The Canons Conservation Area Management Plan in Site Allocation Mi5 (Land at Canons) under "design and accessibility guidance": "Development proposals need to be sympathetic to the historic setting, particularly of Canons House and the views from the nearby Metropolitan Open Land AND HAVE REGARD TO THE CANONS CONSERVATION AREA MANAGEMENT PLAN The Wandle Vistas has been considered in the preparation of Merton's Local Plan and is submitted as part of the Examination library (documents 12D7 and 12D8). It is considered that many of its provisions are either already incorporated or not fully deliverable.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			26. The supporting text also contains a number of errors, all of which were pointed out in response to earlier consultation: □ 4.1.13 - Mitcham cricket ground is the longest continuously played cricket ground in the world, not the "country", where the game has been played every year since at least 1685 □ 4.1.14 - The Canons project is funded by The National Lottery Heritage Fund and The National Lottery Community Fund and not the "Heritage Lottery Fund" and its aim is not "to increase footfall and visibility" although this will be one of a number of positive outcomes □ 4.1.16 - "grassroots football games" have not been played on Mitcham Common for a generation and the site where this occurred is now managed for its ecological benefit.	4.1.13 - wording has been amended in accordance with information provided from the Merton Historical Society. 4.1.14 - wording has been amended. 4.1.16 - agreed, this is not identified in the Merton PPS. Changes made to wording.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			Mitcham-sites 27. We made detailed representations in response to Merton Council's call for sites and to the first iteration of the site allocations. We welcome much of the response to our representations and many of the sites identified in and around Cricket Green. For the Plan to be sound we propose further refinements below and reaffirm the need for an additional site allocation: Addition – 67 Whitford Gardens, Merton Dementia Hub 28. Merton Council has announced closure of the Merton Dementia Hub with services being provided in a more distributed way. This is a key site in public ownership within Cricket Green and also has a direct bearing on site allocation Mi2 for Birches Close. The fact that this announcement was after the call for sites should not prevent inclusion of the site within the Plan. Current uses – Public health Preferred future use – Residential (Class C3) for self/custom build with option for Residential Institution (Class C2) or Medical/Health Service (Class E(e)) Existing planning & other issues – Mitcham Cricket Green Conservation Area, Archaeological Priority Zone, Wandle Valley buffer, Cold Blows historic route, The Birches (locally listed), The Canons house and grounds (listed, SPD) Future opportunities □ Provision of locally affordable homes in perpetuity through delivery by Community Land Trust □ New vehicle access to the Birches avoiding the highly constrained Cricket Green road □ New pedestrian route to The Canons □ Integration of design with Birches Close (Mi2) □ Public realm investment and protection of residential amenity of the site	Noted. Specific responses are made to the sites below.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi1		29. Mi1 Benedict Wharf – This is a prime example of why the Plan needs further strengthening for it to be effective in meeting its stated Spatial Vision and Objectives. Despite a clear requirement in Policy D12.6 that "tall buildings" of over 6 storeys will only be permitted in the Colliers Wood, Morden and Wimbledon town centres and that development at Benedict Wharf must "protect the amenity of adjacent properties" planning permission has been given by the Mayor of London for a development including 10 storey residential blocks that is acknowledged to harm both designated and undesignated heritage assets, including the locally listed cottages in Church Path that lie in the Cricket Green Conservation Area. The priority for this Plan allocation now is to secure integration of the Suez site with adjacent development sites owned by Cappagh and Merton Council and reimagining of Hollowfield Way and the permeability of the site linking London Road to Phipps Bridge and beyond. This can be achieved by: □ Committing to preparing a design brief for the wider site, co-designed with the local community and adopted as a Supplementary Planning Document □ Extending the boundary to include the whole of the mini roundabout by Mitcham Parish Church – this is a key gateway to the Conservation Area and an opportunity for a major public realm improvement – this is envisaged in the site allocation drafting but undeliverable without an amendment to the site boundary □ Extending the boundary to include the La Sporta hall which lies empty and has potential as an enhanced community asset □ Addressing the interaction with Transport for London's preferred option for the Sutton Link which is entirely omitted from the site allocation despite its huge significance as it runs through the site □ Recognising the adjacency of Wandle Valley Conservation Area as well as Mitcham Cricket Green Conservation Area □ Addressing the opportunities for linkages and increased permeability across London Road Playing Fields to London Road, including through Fenning and Baron Courts fronting London Road □ Addressing the opportunity for re-instating the historic Ravensbury Path between Church Road and Ravensbury Park □ Supporting mixed housing delivery mechanisms, including the Local Plan's aspirations for community land trusts and self-build using Merton Council's land along Hollowfield Way □ Recognising route of Surrey Iron Railway (first public railway in the world) through the site □ Requiring investment in community infrastructure (e.g. repurposing La Sporta Hall and investment in Mitcham Parish Centre) □ Addressing the error in the site area which is recorded as being the total of land in Suez and Cappagh's ownership while the site boundary also includes significant additional land in Merton Council's ownership □ Address the mismatch between the proposed indicative site capacity for 650-850 homes and the planning consent for 850 homes for only that part of the site in Suez's ownership □ Correcting the geographical errors in the site description – Morden Hall Park is due west and not north east and Baron (not "Barons") Walk is east and not west of the site, as previously pointed out and as recognised elsewhere in the site allocation text □ Addressing the omission of the land in Merton Council's ownership from the site's "Existing uses" □ Addressing the omission of key sections from "The site location" relating to listed buildings, heritage assets and Conservation Areas	Additional modification proposed to correct factual errors in the "site description" that were already corrected in the "design and accessibility guidance" section "To the north of the site, beyond Cappagh's car pound boundary, lies White Bridge Avenue, a residential road and Benedict Primary School. Morden Hall Park, a historic park owned by the National Trust, lies circa 200m to the north WEST east of the site boundary. To the west EAST of the site boundary lies Baron Walk, a fenced off path and beyond lies London Road playing fields." The extension of the site boundary to include sites that are not within the scope of this allocation. The roundabout on Hollowfield Way and Church Road does not only serve the site but also Church Road; any requirements need to meet the Reg 122 tests of being necessary in scale and kind; this does not require a site boundary extension. Investment in the former La Sporta hall arising from this site via Section 106 would not be justified and is not evidenced. Merton Council's land ownership is recognised in the "site ownership" section. The "design and accessibility guidance" section refers to the heritage assets including conservation areas and listed buildings. Reference to links between the green spaces at London Road Playing Fields, Morden Hall Park and the site are already included within the "design and accessibility" section. The council does not propose a supplementary planning document for this site at this time.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi2		30. Mi2-Birches Close – This site allocation is fundamentally influenced by the opportunity now presented for an additional site allocation for the Merton Dementia Hub (see above). This transforms the access. We do not believe the site being allocated exclusively for residential use in the event of alternative healthcare facilities being provided elsewhere is a sound approach. The existing health facilities would be more appropriately replaced by a mixed use development including office and community functions. This site allocation can be strengthened by: □ Being designed for primary access through the adjacent Dementia Hub site and Whitford Gardens to recognise capacity limits on Cricket Green road □ Requiring development to retain the same equivalent area of open space and to retain significant trees and provide equivalent replacements for trees lost □ Requiring development to provide new access "through" as well as "to, from and around" the site □ Accurately identifying the existing owner as NHS Property Services and not National Health Property Service	Additional modification to correct site owner details to NHS Property Services (from "national health property services"). No further amendments proposed to the site allocation. The Dementia Hub will continue to operate from its current premises. Matters relating to access, space and trees will be considered at the planning application stage having regard to the policies in the adopted local plan.

35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi3	<p>31.Mi3 Burn Bullock & Mitcham cricket pavilion—We welcome the strong approach to this site allocation for restoration of the Burn Bullock and community ownership and management of the cricket pavilion and shed in perpetuity, supported by enabling development. Our valuations of development and restoration options for the site undertaken with the support of the Government's Community Ownership and Management of Assets program supports the viability of this approach. We are in discussion with the owners and architects about the site and may update our approach in the light of further information being made available. We share the Plan's priority to secure community ownership and use of the cricket pavilion and its operational land in perpetuity, linked to use of Mitcham cricket ground, alongside restoration of the Burn Bullock. This should additionally remove the Grade II listed Burn Bullock from the Heritage at Risk register. The owner has legal obligations to maintain the listed Burn Bullock and we support its restoration and reopening as a public house or similar use. We support appropriate residential enabling development necessary to secure these outcomes and believe that to be considered sound the site allocation should include the option of appropriate non-residential enabling development, such as a care home or hotel, which is compatible with other uses.</p> <p>32.We have taken legal advice on the approach in the Local Plan from Town Legal and believe to be sound the site allocation should be strengthened by: <input type="checkbox"/> Establishing a requirement for transfer of the ownership of the cricket pavilion and its operational land at a reasonable cost to be determined by an independent valuer if necessary <input type="checkbox"/> Inserting "The Council will (without prejudice) consider the use of compulsory purchase order powers in the event that the cricket pavilion cannot be acquired by private treaty" at the end of the first paragraph in the site allocation—the Plan acknowledges the potential to use such powers in relation to the Morden regeneration zone (Site Mo4 and paragraph 5.1.59) and they are appropriate on a smaller scale to securing the Plan's desired outcomes for this critical site <input type="checkbox"/> Recognising in the site allocation that the residential development "will" be acceptable on the upper floors of the Burn Bullock "provided that the non-residential uses of lower floors are thereby implemented and secured" <input type="checkbox"/> Inserting "the retention and continued operation of and" after "enable" in the final paragraph of the site allocation <input type="checkbox"/> Inserting "and its" between "Mitcham Cricket Pavilion" and "associated land and buildings" in the site allocation and in the Design and accessibility guidance <input type="checkbox"/> Replacing "Use of the Burn Bullock building as non-residential uses" with "Use of the Burn Bullock building in non-residential uses" in the site allocation <input type="checkbox"/> Deleting "currently" in the site description's reference to use of the pavilion—the pavilion building is purpose built as a cricket pavilion and has never been used for anything else since it opened in 1904 <input type="checkbox"/> Replacing Mitcham cricket pavilion was "built around 1920" with "opened in 1904" in the site description and site location <input type="checkbox"/> Recognising Mitcham cricket pavilion as "the oldest" not "one of the oldest" cricket grounds in the world in the site description—on the basis of the game being "consistently played since at least 1685" on Cricket Green <input type="checkbox"/> Starting "Opportunity to bring an underused site at the Burn Bullock into use" as a new paragraph in the Design and accessibility guidance <input type="checkbox"/> Inserting "The Council will consider the use of compulsory purchase order powers if necessary to secure the long-term future of the cricket pavilion if it appears to the Council that this is in doubt" at the end of the fourth paragraph in the Design and accessibility guidance <input type="checkbox"/> Inserting "Planning obligations will be sought to ensure that a robust mechanism is in place so that any residential development on the upper floors secures and facilitates the delivery of the non-residential uses" at the end of the sixth paragraph of the Design and accessibility guidance <input type="checkbox"/> Starting "Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green" in the penultimate paragraph of the Design and accessibility guidance as a new paragraph <input type="checkbox"/> Replace "designed" with "designated" under Impacts a designated open space</p>	<p>Additional modifications proposed to:</p> <ul style="list-style-type: none"> - correct that the cricket pavilion opened in 1904, replacing phrase that it was built in 1920, and delete the word "currently" from the site description as that part of the site has always been used as a cricket pavilion Correct the grammar and state "use of the Burn Bullock in non residential uses" <p>At the time of writing the council has not resolved to compulsory purchase the site at this time so no amendment will be made to state this.</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi4	<p>33.Mi5-Land at The Canons—Notwithstanding the extant planning permission for residential development on this site we do not believe the allocation of the former nursery at The Canons for development is sound. This allocation fails the effective soundness test as it is not deliverable over the plan period given Merton Council's decision to wind up its property development company Merantun Development Ltd. The site only came forward and was only consented because it was owned by Merton Council and the applicant was Merton Council's own development company. An alternative developer is not a viable alternative given the planning consent was linked to the development of three other locations, not least to provide a [non-policy compliant] level of affordable housing. Merantun's closure has also demonstrated the development across these four sites is not viable. We believe there are other better uses for this land which would both retain public access and support the wider ambitions for The Canons and Park Place envisioned in the Lottery-supported £5m+ investment in the site. Notwithstanding this view the site allocation omits a number of significant considerations, including: <input type="checkbox"/> Recognising the wall running by the site as being Grade II listed (confirmed as part of the Canons Lottery project) <input type="checkbox"/> Referencing the need to respect The Canons Conservation Management Plan which is an adopted supplementary planning document <input type="checkbox"/> Recognising the proximity to the Grade II listed Park Place to the east of the site and that it lies on the historic boundary between the two mansion houses <input type="checkbox"/> Recognising and committing to protecting the exceptional Pagoda tree in the west of the site—recognised as Merton's Tree of the Year <input type="checkbox"/> Addressing multiple erroneous references to "Canons House" instead of "The Canons" <input type="checkbox"/> Updating reference to the children's playground north of the site which is scheduled to be removed as part of the Lottery project and has been replaced by a new playground west of the site</p>	<p>Additional amendment proposed at "impacts listed building or undesignated heritage assets" to reference the Grade II* listed wall as well as the Grade II* listed Canons House and Grade II listed Dovecote.</p> <p>Additional amendment proposed to refer to development proposals having regard to The Canons Conservation Area Management Plan in the "design and accessibility guidance" section.</p> <p>No further amendments proposed.</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi6	<p>34.Mi6 –326-328 London Road—We do not support the allocation of this site solely for residential use if the current community functions are located elsewhere to be sound. The centralisation of community functions such as the existing Citizens Advice in a location such as the Wilson should result in a net gain in community infrastructure. The site allocation should be updated to recognise 326 London Road (Kellaway House) as a non-designated heritage asset as it was added to Merton's Local List by decision of Merton Council on 18 November 2020. The Mitcham Cricket Green Conservation Area Appraisal and Management Plan also identifies Kellaway House as making a positive contribution to the Conservation Area and identifies the front elevation as being of gault brick. Its retention should be an essential requirement of any site allocation.</p>	<p>Additional modification proposed to refer to the addition of 326 London Road to Merton's Local List in November 2020.</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi7	<p>35.Mi7-370 London Road (car wash site)—There has been no prior public consultation on this site allocation as the site description provided at Stage 2a was erroneously for 326-328 London Road. We were not provided with the text for the site allocation during the public consultation period despite it coming forward as a result of our submission on the prior Call for Sites. To be sound this site allocation should be: <input type="checkbox"/> correctly addressed as 370-374 London Road <input type="checkbox"/> guided by the height of buildings along London Road to the south west and not the unimplemented planning permission at 360-364 London Road. Broadway Gardens provides a natural break in the townscape; the indicative site capacity for 5-8 new homes would not be consistent with a higher building; and the identified opportunity for "strengthening and extending local retail parade" would not be achieved by a discordant higher development.</p>	<p>No further change proposed. The site was consulted on at Stage 2. We apologise for the error that led to some of the text not being accurate at stage 2a</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi8	<p>36.Mi8 Majestic Way and Mi12 Sibthorpe Road car park—These two large sites in the heart of Mitcham's centre are pivotal to its future success. The site allocations are not sound and do not effectively deliver Policy N4.1 for Mitcham. They are limited in their approach and unduly focused on retail and residential uses rather than the wider cultural needs of Mitcham for places that attract and encourage people to stay. This would include options such as a cinema, relocated library and much needed social and community infrastructure. Both sites provide opportunities to create new central spaces which add to the historic core around Fair Green. They can also increase permeability within and across the centre and create a much more substantial centre with two new areas set back from existing routes and each contributing their own distinct character. The existing Wandle Vista on the top floor of the existing multi-storey car park should be acknowledged and future public access to the rooftop of new development should be supported.</p>	<p>No further change proposed Mi8 Majestic Way is allocated for "Mixed use: town centre type uses including retail, businesses, food and drink, leisure and community services (health centres, crèches, day nurseries, day centre) on the ground floors, residential on upper floors" and Mi12 Sibthorpe Road car park is allocated for "Town centre type uses including retail, food and drink, offices, work spaces, leisure, community services and residential on upper floors." These allocations provide scope for community uses, cinemas etc as requested in the representation. Both sites have design and accessibility guidance sections that recognise their prominent locations and the accessibility benefits they have. The Wandle Vista report has been considered in developing the Local Plan, however the council is not intending to require public access to the rooftop of new buildings.</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi9	<p>7.Mi9-former Mitcham fire station—This allocation is unsound given the recent planning permission for development of nine homes—more than double the indicative capacity and with no mixed or community use. This is despite Merton Council controlling the right of access to the highway enabling it to exercise a significant influence over the development and use of the site. If retained the details the site allocation should be strengthened to improve the soundness of the site allocation by: <input type="checkbox"/> Recognising that the adjacent war memorial has recently been Grade II listed and that the redevelopment of the Cricketers pub is complete <input type="checkbox"/> Extending the boundary to include the apron down to the road given its importance to the streetscape and former function—the lack of integration of this land with the existing building has been a major problem in managing a recent planning application for the site <input type="checkbox"/> Providing a clear expectation as to the required mix of uses and that this needs to include some Class F and Class E <input type="checkbox"/> Ensuring the characteristic apron in front of the building is not cluttered with bins, services or parking</p>	<p>Additional modification proposed to reference the Grade II listed war memorial in the site description and the later heading on heritage assets. Additional modification to reference the planning permission 20/P0801 granted permission on 25th November 2021</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi11	<p>38.Mi11-Raleigh Gardens car park—We support the scope for residential development on this site with a retail, community or civic use on the ground floor providing an active frontage that links to London Road. We do not believe the site allocation is sound. This allocation fails the effective soundness test as it is not deliverable over the plan period given Merton Council's decision to wind up its property development company Merantun Development Ltd. The site only came forward and was only consented because it was owned by Merton Council and the applicant was Merton Council's own development company. An alternative developer is not a viable alternative given the planning consent was linked to the development of three other locations, not least to provide a [non-policy compliant] level of affordable housing. Merantun's closure has also demonstrated the development across these four sites is not viable. Any future development must, as the site allocation indicates, "protect the residential amenity of adjoining properties to the rear". This was not achieved by the development granted consent which results in 55% of Glebe Court's windows facing the new development not meeting official guidelines for daylight and 29% being subject to noticeable loss.</p>	<p>No further change proposed. Planning permission was resolved to be granted for a development on this site, which is referenced in the proposed site allocation.</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham		<p>39.Mi16-Mitcham Gasworks—This site allocation is unsound as it fails to recognise the gasholder to the north of the site as an undesignated heritage asset on Merton's Local List. We support largely residential development which should also make provision for local retail and community uses. The site should significantly improve permeability between Mitcham village centre and Church Road. The site allocation should be clear this is not a location where Merton Council will permit tall buildings over six storeys and any development should respect the existing streetscape.</p>	<p>Additional modification proposed to clarify that the gasholder has permission for demolition. The proposed allocation is for residential led development including open space and community uses, it is not proposed to add retail uses to this site given its location adjacent the town centre. At 2.4ha the size of the site allows for consideration of some taller buildings subject to consideration of impacts on character, heritage and townscape and this is already included in the proposed allocation</p>
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham		<p>40.Mi17 -White Hart—This allocation is unsound given the recent planning permission on appeal for a change of use for the public house and significant development of a residential block in its car park. If the site allocation is retained we support the approach linking residential development to the restoration and viable re-use of the White Hart as a public house or similar function. The drafting needs strengthening if the site allocation is to be considered sound to: <input type="checkbox"/> Provide a complete site description without any missing sections and recognise the potential impact on other listed buildings and heritage assets, including the Burn Bullock: <input type="checkbox"/> Require any development to not be visible from Cricket Green or Lower Green West given the impact on the listed buildings and the Conservation Area <input type="checkbox"/> Ensure access for servicing, deliveries and residential use is only permitted from Broadway Gardens <input type="checkbox"/> Retain the characteristic yard entrance from London Road for pedestrian use only <input type="checkbox"/> Require investment in the public realm and function of the Jubilee Corner junction</p>	<p>No further change proposed. The proposed site allocation references the planning permission granted in April 2021 for ground floor non residential uses and 15 homes on this site.</p>

35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham			41.Mi18 -Wilson Hospital-There has been a significant change in this site allocation in response to indications from the Clinical Commissioning Group that the new local health centre for Mitcham will be located on a different site. A site options appraisal is due to conclude in November 2021. We supported the original proposed site allocation for healthcare and community uses, including the requirement that residential development should only be permitted if necessary to enable wider delivery of the site. We do not consider an alternative wholly residential allocation if healthcare facilities are provided elsewhere to be sound. This significant site needs to offer more mixed use and community facilities and be driven by a clear community-led masterplan. To be sound the details of the site allocation need to be strengthened by: <input type="checkbox"/> Committing to preparing a design brief/masterplan for the site, building on the community planning and design brief prepared by Mitcham Cricket Green Community & Heritage, and adopting it as a supplementary planning document; <input type="checkbox"/> Specifying a need to retain the full classical frontage and symmetry of the existing building facing Cranmer Green which has historic significance that extends beyond the entrance portico; <input type="checkbox"/> Retaining a horizontal built form on the key frontage facing Cranmer Green <input type="checkbox"/> Retaining and repurposing the historic lodge opposite Cranmer Green which provides an important link to the original function of the site; <input type="checkbox"/> Incorporating a new drop-off to Cranmer School as part of any development; <input type="checkbox"/> Requiring any residential development along Caesar's Walk to respect its existing character and provide an extension of the current two storey residential form; <input type="checkbox"/> Requiring any enabling residential development to be supported by evidence that the site's re-development cannot otherwise proceed without it <input type="checkbox"/> Confirming that development of the linked site at the Birches will be considered in any assessment of viability and deliverability; <input type="checkbox"/> Linking funding secured through any enabling residential development exclusively to provision of community wellbeing services; <input type="checkbox"/> Delivering no increase in the footprint of buildings over the whole site and no development in the green corridor running through the north west and south east of the site <input type="checkbox"/> Avoiding loss of green space and tree cover and retaining the significant group of trees to the east of the hospital and commemorative trees <input type="checkbox"/> Retaining open land & views into the site along Cranmer Rd and Caesar's Walk <input type="checkbox"/> Ensuring full public access to the grounds and making positive use of the open space for public health, wellbeing, informal play and wildlife <input type="checkbox"/> Correctly identifying the owners of the site as NHS Property Services.	Additional modifications to clarify that the site owner is NHS Property Services (not National Health Property Services) The proposed specific design parameters are either already part of the site allocation or not fully justified at the site allocation stage. Responses from NHS Property Services to this Stage 3 Regulation 19 consultation state that a health campus is to be developed on the Wilson site. There has not been a significant change in this regard.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mi19		42.Mi19 -Worsfold House-This site allocation was missing from the Stage 2a public consultation. It appeared on the site allocations map but was missing from the site allocations which provided details for site Mi9 (Mitcham fire station) instead. Despite representations we were not provided with details of the site allocation and so were unable to make representations. We support the approach and to make the site allocation sound it needs to be strengthened to: <input type="checkbox"/> Require investment in the public realm along Church Path and on the site boundary <input type="checkbox"/> Correctly identify and name listed buildings and structures with potential impacts <input type="checkbox"/> Integrate with investment in London Road Playing Fields and new links consequent upon the redevelopment of Benedict Wharf (Mi1)	No further change proposed. The site was consulted on at Stage 2. We apologise for the error that led to some of the text not being accurate at stage 2a
35	Mitcham Cricket Green Community and Heritage (MCGCH)	04 Mitcham	Mo3		43.Mo3 -Imperial Fields-This allocation appears incorrectly in the Morden chapter of the Plan despite falling within the area covered by the Mitcham chapter (see map on page 117) and this error being pointed out at Stage 2a. We do not support the proposed site allocation which involves the development of Metropolitan Open Land. The text needs to be updated to recognise the Mayor of London's unfortunate decision on 26 April 2021 not to direct that he make the decision and to allow Merton Council's grant of planning permission for a significant block of flats to stand. 44.The site allocation remains wholly incompatible with the site's Metropolitan Open Land status and we note that no amendment to the MOL boundary is envisaged. The Green Infrastructure, Biodiversity and Open Space Study prepared by The Environment Partnership for the Local Plan's evidence base concludes that there should be no change in the status of the site as Metropolitan Open Land. Green Corridor or Open Space (below). We agree	Officers agree this site should be moved to the Mitcham chapter and this change has been made. The wording in the site allocation has been updated to reflect the GLA decision. The MOL boundary for this site is to be updated on the Policies Map now that the planning application has been approved.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	11 Housing	H11.1(f)		Affordable homes requirements - We support the Plan's expectation in Policy H11.1 for at least 50% of homes to be affordable and for a minimum of 70% of these to be for low cost rent. Nevertheless, we do not believe this will result in local needs for homes being met and so the Policy fails the soundness test in that it will not be effective and deliverable over the plan period. To achieve this will require additional intervention through the dedicated provision of homes for social rent, through the progressive use of public sector land and through explicit provision for self- and custom-build homes. We would support an increase in the share of affordable homes for low cost rent above 70%.	No further change proposed. Supported by robust evidence, Policy H11.1(f) strikes a suitable balance towards effectively contributing to much needed local affordable homes and ensuring that the affordable housing policy requirements are viable and deliverable.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	11 Housing	H11.2		We question the ability of Merton to accommodate over 11,700 additional homes by 2035/36 in a manner consistent with the Plan's Spatial Vision and Objectives for respecting the Borough's character and heritage, sustaining its communities and improving its environment. It is also dependent on achieving a level of development of large sites that far exceeds the historic record. Policy H11.2 is unsound - it is neither justified nor effective and will not be consistent with national planning policy for protecting heritage assets and good design. There are currently over 1,000 flats in the pipeline within a short walk of Mitcham's historic cricket ground. Their delivery will change the character of the area, for the worse, for ever while also failing to meet local needs for homes. If this requirement is adopted, then the approach to accommodating such a large number of new homes will need to be much more discerning in its approach to the location of development to protect areas with a strong existing character.	No further change proposed. The GLA have confirmed that Policy H11.2 is in conformity with the London Plan. Merton's housing trajectory sets out how the accommodation of the housing target will be achieved over the draft Local Plan period. The draft Local Plan is read as a whole. Development proposals will be required to comply with all relevant policy requirements including those concerning respecting the borough's character and heritage, sustaining its communities and improving the environment.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	11 Housing			We are concerned that virtually no development taking place in Mitcham in recent years has been policy compliant with the existing requirement for affordable homes including development put forward by Merton Council on its own land. This aspect of the Plan will require significant additional intervention if it is to be deliverable. It is a priority for monitoring and corrective action.	No further change proposed. No specific details have been provided by the consultee of the developments in question. On the presumption that the developments taking place have planning approval or an upheld planning appeal decision these would have been assessed against the adopted Development Plan and found to be in compliance with all relevant policies contained therein. Draft Local Plan Policy H11.1 affordable housing policy requirements has been prepared in accordance and conformity with the NPPF and the London Plan. The GLA have formally confirmed that Policy H11.1 is in conformity with the London Plan. The performance of all the draft Local Plan policies will be monitored via Merton's Authority Monitoring Report (AMR) which is published annually.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough	D12.3		Single aspect homes (D12.3) 69. We welcome recognition of the importance of avoiding the provision of single aspect homes in future. We do not consider such homes offer adequate living conditions and through extra demand for heating and cooling systems they will also increase energy use and run counter to the declared Climate Emergency. The approach remains unsound in that it will not be effective in achieving the Plan's objectives. Policy D12.3 only permits single aspect homes where there is evidence of "adequate passive ventilation, daylight". In the absence of any definition of "adequate" we do not believe this will be deliverable through development management. It is our experience that too many single aspect homes are already being permitted contrary to existing policy. 70. We believe the Plan needs to be more strongly worded to avoid single aspect homes. This should include addressing single aspect homes in the Plan's design and not just the contribution to tackling the climate emergency. Policy D12.3 should therefore address the need explicitly to avoid single aspect homes with dual aspect provision required as a minimum. This is consistent with the London Plan.	The policy wording has been reviewed and amendments have been made. It is important that all future housing developments provide high quality homes. Dual aspect homes have many benefits and should be maximised. There are some circumstances where single aspect homes cannot be omitted, and if so the policy wording states that these homes must demonstrate that they are still of a high quality. However, the wording of policy D12.3.z has been amended to take a stronger position against single aspect homes to ensure that future applicants are fully aware of Merton's position on providing them.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough			Places and Spaces Design (D12.1, D12.2) 45. The policy intent for "the highest standards of design" in development is welcome but the Policy is incapable of being delivered. Evidence of developments permitted under the current development plan with a similar policy framework demonstrates this. We do not consider the new Local Plan policies significantly strengthen the current policy framework under which so much poor quality development has been permitted. This is illustrated by the following recent examples, where planning permission was recommended by officers in all cases and all except The Cricketers options given permission: (refer to images in submission)	The policy wording has been reviewed and no further action has been taken. Justification text D12.1.1 sign post to new and adopted design specific SPD's, such as Merton's Character Study and Small Sites Toolkit, that have been developed to inform this Local Plan and provide design guidance for future applicants and share best practice design approaches.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough	D12.1		46. Policy D12.1 should make direct reference to the National Design Code and include a commitment to the preparation of design codes in key locations across the borough. These should be prioritised against the level of likely change and their sensitivity - we believe Mitcham Cricket Green Conservation Area and its environs should be a priority for a design code given the pressure for blocks and flats which would fundamentally affect its urban form over the period of the Local Plan.	The policy wording has been reviewed and amendments have been made. Policy D12.1.a makes direct reference to the NPPF which references both the National Design Code and National Design Guide. Direct reference within the policy to the National Design Code and National Design Guide is not needed. Additional justification text D12.1.8 has been introduced to signpost directly to the relevant sections of the NPPF that highlight the National Design Guide and National Model Design Code to add further clarity to the policy.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough	D12.2		47. Policy D12.2 should specifically recognise the Wandle Vistas identified in the award winning research commissioned by Wandle Valley Regional Park Trust, Wandle Valley Forum and Living Wandle as "identified important local views, panoramas and prospects." This research provides the highest possible standard of evidence to support the Plan having been recognised with the RTPI's Excellence in Plan Making Practice award and the Landscape Institute's Award for Landscape Policy and Research. It includes guidance specifically prepared for plan-making bodies in the Wandle Valley available here and here. Two of these are in the Mitcham area - St Marks Road car park and Mitcham Common - and parts of the Pollards Hill vista are also in Merton. (refer to images in submission)	The policy wording has been reviewed and no further action has been taken. The Wandle Vista's report has been reviewed in light of the Local Plan and it has not been referenced within the policies. The St Marks Road car park is not from public space and forms part of site allocation Mi8, and as such cannot be used to inform future development. It is recognised that views and vistas form an important part of the look and feel of the borough and should inform and facilitate future development that is of place in the borough. Policy D12.2.e 'Ensure that scale, height, mass, bulk and form in its site and context is appropriate and has explored its visual impact from short, mid and longer views where applicable.' ensures that views and vistas inform future applications.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough			Managing heritage assets (D12.5) 48. The commitment to conserving and enhancing heritage assets is welcome. Policy D12.5 needs to be strengthened to be sound enough to deliver this, including by correctly referencing the 2021 National Planning Policy Framework.	The policy wording has been reviewed and amendments have been made. Policy D12.5.c has been amended to directly reference the NPPF
35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough			49. Paragraph 12.5.6 provides a range of heritage assets addressed by Policy D12.5. All of these are identified either nationally or elsewhere in the Plan with the exception of "Local Historic Parks and Gardens". These undesignated heritage assets make an important contribution to the character of the Borough and they should be identified in the Plan via an inventory and map and online. The Appendices only address the four nationally graded Historic Parks and Gardens in the Borough. It is notable, for example, that Croydon's Local Plan includes 51 locations on its Local List of Historic Parks and Gardens based on criteria set by Historic England along with the London Historic Parks and Gardens Trust. Merton's equivalent should include the grounds of The Canons and Park Place, including that addressed in The Canons Management Plan which is an adopted supplementary planning document. Mitcham's registered Town Greens and the Metropolitan Commons should also be recognised as heritage assets and London Historic Parks and Gardens Trust also identifies Glebe Court Estate, Mary Tate's Almshouses, Mitcham Garden Village, Ravensbury Park, St Peter & St Paul Churchyard and Watermeads in its inventory of historic parks and gardens for Merton. The Plan needs to identify each of the Local Historic Parks and Gardens for it to be complete and justified and to be found sound.	The policy wording has been reviewed and amendments have been made. Local Historic Parks and Gardens form part of the unique character of Merton, alongside all designated and non designated heritage assets. Policy D12.5.f has been amended to directly refer to non designated and designated heritage assets. An additional policy D12.5.f.iv has been added to ensure that 'Proposals should not prejudice the future restoration of designated and non designated historic parks and gardens.' Furthermore, justification text D12.5.6 has been amended to add clarity to all undesignated heritage assets.

35	Mitcham Cricket Green Community and Heritage (MCGCH)	12 Places and spaces in a growing borough			50.Paragraph 12.5.6is misleading in referencing only "Locally listed buildings" as undesignated heritage assets. Merton's Local List includes a range of other structures, including a gate post and a stench pipe/gas lampin Cricket Green.	The justification wording has been reviewed and amendments have been made. The amended wording provides a better definition of undesignated heritage assets
35	Mitcham Cricket Green Community and Heritage (MCGCH)	13 Economy			Economyand Town Centres(EC13.1, EC13.2, EC13.3, EC13.4, TC13.5)53.This section of the Plan needs to be more effectively related to the individual policies on different parts of the boroughif it is to be considered sound, including Policy N4.1for Mitcham (see above), includingby:□Identifying the individual scattered employment sites(Policy EC13.3) and neighbourhoodparades(Policy TC13.5)and addressing the omissionswe have identified□Supporting in Policy EC13.1, EC13.2 and EC13.4 a greater diversity in floorplate sizes and the provision of affordable workspace to support local and independent businesses (as recognised in the London Plan (publication version) policies E2 and E3)□Supporting in Policy EC13.2 a significant enhancement of the local environment in major industrial areas, including Willow Lane which suffers from an extremely degraded public realm and turns its back on the Wandle—we also question to description of Willow Lane's "focus onheavy industry" (Paragraph 13.2.17)which comprises only a small component of its diverse industrial uses□Recognising Mitcham as a "District Centre" and not a "Town Centre"given the needto recognise its character as a villageand the District Centre classification for Mitcham in the London Plan	No further changes proposed. The policies in Chapter 13 (economy and town centres are effective. There are no proposals to identify individual scattered employment sites who, by their nature, are scattered across the borough. We have considered representations at various stages to add more neighbourhood parades and these have not been taken forward as effective and deliverable. The London Plan has an affordable workspace policy that does not require repeating in Merton's Local Plan as the London Plan is part of the statutory development plan. Mitcham is recognised as a District Centre in Policy TC 13.5 "Merton's town centres and neighbourhood parades" and throughout the plan
35	Mitcham Cricket Green Community and Heritage (MCGCH)	14 Infrastructure	IN14.2		Social and community infrastructure (IN14.2) 71.We welcome the commitment to social and community infrastructure. Policy IN14.2's resistance to the loss of community facilities is especially welcome. There will be some circumstances where loss is inevitable and we believe to be sound the policy should be strengthened to introduce a requirement to make equivalent or better provision in the local area in these circumstances.	The support for this policy is noted. The policy sets out how social and community infrastructure is to be supported to ensure the changing priorities and needs of the borough are met, encouraging the multi-use of spaces. It also sets out the requirements for applicants to provide a Community Needs Statement and marketing and vacancy evidence to demonstrate that any proposed loss would not create, or add to, a shortfall in provision for the specific use. Therefore a loss of a social or community infrastructure would only come forward if the loss has been justified. Officers do not consider any further changes are required to this policy to make it sound as it has been positively prepared in line with National and London policies.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	14 Infrastructure	IN14.2		72.To be effective and deliverable in the Plan period Policy IN14.2 also needs to be supportedby a non-exclusive inventory of social and community assets. We have identified those for Cricket Green and its environs in our representations on the Mitcham section of the Plan. These should be explicitly recognised in support of Policy IN14.2 as needing protection. This level of detail would be consistent with the approach taken by the Plan to providing details of local parades to be protected	With the recent changes to the Use Classes Order in 2020, many community assets can now change to other permissible uses through permitted development. Therefore identifying sites in the policy would not necessarily protect them from future changes by a landowner. The Infrastructure Delivery Plan makes reference to a number of services and directories including the Merton Community Plan and Merton Family Services Directory, which identify community facilities throughout the borough. Some of the assets mentioned in this submission may also be designated on the Policy Maps, including open spaces and playing pitches. Officers do not consider any changes are required to this policy
35	Mitcham Cricket Green Community and Heritage (MCGCH)	14 Infrastructure	IN14.2		73.To be effective the Local Plan also needs to be strengthened by identifying areasof deficiency in the provision of key community facilities, such as affordable community meeting spaces, and supporting development which addresses these deficiencies. Mitcham Cricket Green is an area with a deficiency in affordable community meeting spaces.This would be consistent with the approach taken to identifying other deficiencies, such as access to open space or play provision.	Policy IN14.2 is supportive of multi-use social and community infrastructure, which includes community meeting spaces. A flexible approach is deemed necessary to encourage a wide range of facilities to be available for the community, in shared spaces where this is possible, particularly taking into account the impacts from the Covid-19 pandemic. An example of where community meeting spaces can be accessed in the Mitcham Cricket Green area is Vestry Hall. Officers do not consider any changes are required to this policy
35	Mitcham Cricket Green Community and Heritage (MCGCH)	14 Infrastructure	IN14.3		74.Policy IN14.35 should ensure that all development relating to sport and recreation is consistent with other policies in the Plan, including in relation to the protection of heritage, landscape and avoidance of light pollution. The Policy should also address the singular failure to secure effective Community Use Agreements in relation to a number of recent developments in local schools. As drafted the Policy will not be effective as it cannot be delivered in the plan period	All relevant policies in the Local Plan will be applicable to forthcoming planning applications and would need to be considered as a whole in the assessment of a proposed development. Policy IN14.3(f) includes a reference to Community Use Agreements, with further supporting text provided. Officers do not consider changes are required to this policy.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	15 Green and Blue infrastructure	O15.1		54.We welcome the commitment to maintaining, enhancing and improving access to Merton's green and blue infrastructure. For the Local Plan to be effectiveit needs significantly to be strengthened to achievethis.	Support for the policy is noted. It is also noted that further comments are made in detail in this submission. These are considered separately below.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	15 Green and Blue infrastructure	O15.4		55.Policy O15.4 is inadequate to achieve the Plan's intentions to protect and increase the number of trees in the Borough. Our recent research into recent planning applications within just 800m of Mitcham cricket ground shows 138 trees are to be lost:	The new Local Plan policies will be applicable to future planning applications, once the plan has been adopted. No changes can be made retrospectively to already approved planning applications through the new Local Plan, unless further planning applications are submitted. Officers consider that Policy O15.4 is in accordance with the London Plan and encourages and supports the protection of trees throughout the borough. No changes recommended.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	15 Green and Blue infrastructure	O15.4		56.We have prepared a Ten Point Planfor Trees which identifies opportunities for the Local Plan, including: □Addressing the need to increase the tree canopy (as well as the number of trees) and achieve improved urban greening in Policy O15.1 □Addressing the importanceof identifying, protecting and enhancing the "landscape" in Policy O15.1 alongside "nature"and "open spaces, green infrastructure and the natural environment" □Recognising Merton's important inheritance of common land and registered town and village greens, including in and around Mitcham,in Policy O15.1 and the environmental policy maps □Designating all "Open Space" as Local Green Space, supported by an assessment of how it meets the requirements of paragraph 102of the NPPFto afford greater protection □Addressing the important contribution of ponds to Merton's blueinfrastructure and identifyingThree Kings Pond, The Canons pond, Cranmer Green pond and the ponds on Mitcham Common as sites for protection	Officers have reviewed the Ten Point Plan provided and some amendments were made to Policy O15.4 from the Stage 2a consultation document. Some of the proposed ideas and details relating to trees may be explored through the Council's Climate Action Plan. Until this takes place, the Local Plan does not have the evidence to support such policy changes. Officers note that some of the points provided in para 56 of this submission are not included in the Ten Point Plan. Canons Pond, Mitcham Common, Three Kings Pond and Cranmer Green are all identified as Sites of Importance for Nature Conservation on the Policies Map. Officers consider that Policy O15.4 is in accordance with the London Plan and no further changes are required.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	15 Green and Blue infrastructure	O15.6		65.Policy O15.6 should specifically identify the opportunities for improved access on foot to the Wandle through development in Willow Lane industrial estate, complementing the approach taken to providing an 8m buffer in the draft South London Waste Plan. There is potential for a new public route running along the east side of the Wandle south from Bennett's Hole Local Nature Reserve and providing a more appropriate boundary with Willow Lane.	This policy currently includes wording to seek improvements to walking and cycling accessibility. For three waste management sites on the north bank of the River Wandle, in the Willow Land Industrial Estate, the following text is included in the draft South London Waste Plan as a matter to consider if the safeguarded waste site is to be developed: "Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development". The Wandle Trail currently runs along the southern side of the River Wandle at this location and it has not been identified as part of our evidence base that an extension is required along the northern part of the river. Officers do not recommend further changes.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	16 Sustainable Travel			Sustainable Travel(T16.5)75.We do not support the Cycle "Improvement" number 11 on Figure 10-A which involves the unacceptableloss of registered Town Green on Three Kings Piece. This impact is unwarranted and there is no link to existing cycle routes at either end. The route cannot be delivered without the loss of a significant number of trees that line Commons West and are located closer to the road than the width of any new cycle route(see below). It will urbanise and seriously erode the character of the sensitive boundary of Three Kings Piece. More space for cyclists should be found by reconfiguring the existing highway(including pavement).The deliverability of these plans is highly questionable given the limited progress made on the timetable set out for financial years 2019/20 to 2022/24 and the need for Secretary of State approval were registeredTown Green to be required. The proposal is unsound. It cannot be delivered within the Plan period.	Comments noted. No change proposed. This comment refers to scheme 11 (Commonside West) identified in the "proposed cycle infrastructure delivery programme" (Figure 10-A) from Merton's current approved transport strategy (LIP3). Note that this plan was appended to Stage 2A of the local plan but has not been included at stage 3. However the scheme route is shown on the indicative cycle network plan and it is not proposed to remove this route from the map as it is considered deliverable and is the intention to further progress this scheme as part of delivering Merton's current Transport Strategy. The comments on this route have been noted and will be further considered along side full consultation to be conducted on the scheme in the course of delivering Merton's current Transport Strategy.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	16 Sustainable Travel			76.We also question the deliverability and the practicality of Proposal TN11 for a new tram stop at Willow Lane only c200m from the existing tram stop at Mitcham Junction.	This comment refers to proposal TN7 in stage 3 of the Local Plan, which outlines improvements to the Tram Network. Comments noted but no change proposed as this is consistent with London Plan policy T3 which includes Tram upgrades.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	17 Appendices			51.We do not recognise the inclusion of The Canons as a separate Conservation Area (8.4 ha) in the Appendices (page 603). The Canons is part of the Mitcham Cricket Green Conservation Area.	Additional modification to page 603 table of conservation areas to clarify that The Canons is part of Mitcham Cricket Green Conservation Area
35	Mitcham Cricket Green Community and Heritage (MCGCH)	17 Appendices			52.The Appendices inventory of nationally listed buildings is incompleteand has some duplicate entries. The war memorial on Lower Green West was listed Grade II on 26 July 2017and appears in neither the Appendices nor the untitled Heritage Policies Map.The reference in the Appendices to the Grade II listed Obelisk needs to be updated as it has been re-united with The Canons as a result of the Lottery project (page 616). The entry is duplicated on page 610.	Officers have reviewed the list in the Appendix and made changes where necessary to correct any errors.

35	Mitcham Cricket Green Community and Heritage (MCGCH)	Evidence Documents			Evidence 77. We do not believe the Local Plan's evidence base to be sound. There was no information on the range of Local Plan research undertaken to inform the evidence base provided on the public consultation pages for the Stage 2a consultation or Merton Council's general planning page and the link now available was not provided. There has been no opportunity fully to interrogate the evidence base on which the Plan has been prepared.	no further changes proposed. Merton's local plan research page contains up to date and older evidence to support planning policies. Links were provided within the Local Plan where possible and references to the evidence (e.g. Merton's Strategic Housing Needs Assessment 2019; Merton's Green Infrastructure Study 2020) is clear within the text and the documents are easy to find using a search engine or a search of Merton Council's website.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Evidence Documents			78. Where the opportunity has been provided we have fed into work undertaken as part of the evidence base. These opportunities have been limited and the quality of much of the work has been poor. This is evidenced in our responses to the following which show documents prepared with limited insight from the local community. Merton Council refused a request for its Open Space Study consultants to meet with local community groups with an interest in parks and green spaces in the borough. Merton Character Study Small sites toolkit Open Spaces Study	The Merton Character Study and Small sites toolkit were both prepared as Merton Supplementary Planning Documents and therefore included six weeks of consultation, before a report was considered and agreed by Cabinet to adopt the SPDs. During the preparation of the Green Infrastructure Study, the consultants TEP held discussions with local user groups "Friends of the Parks", to help understand their aspirations and concerns on Merton's open spaces. Contact was made with Mitcham Cricket Green Community & Heritage and a response was provided showing an interest in participating on 29 August 2018. A variety of consultation has been undertaken to inform the new Local Plan and officers consider that the work has been prepared diligently and comprehensively. The authority monitoring report conducts a shopping survey, usually annually, which helps monitor town centres and existing planning policies and informs future policy production. Mitcham Cricket Green's conservation area appraisal and management plan has been complemented by The Canons Conservation Area Design Guide 2017
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Evidence Documents			79. We are also concerned by the lack of an up to date retail study including showing the diversity of uses in Mitcham village centre) and up to date Conservation Area Appraisal and Management Plans for Cricket Green (2013) and Wandle Valley (2007).	The authority monitoring report conducts a shopping survey, usually annually, which helps monitor town centres and existing planning policies and informs future policy production. Mitcham Cricket Green's conservation area appraisal and management plan has been complemented by The Canons Conservation Area Design Guide 2017
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		59. We welcome the inclusion of the valued open space behind Mary Tate Cottages (AO21) as new Open Space. The site makes a positive contribution to the area as open space by virtue of its character, whether or not it serves as a community garden or allotment. It is also recognised London Historic Parks and Gardens Trust in its inventory of historic parks and gardens for Merton	Support for this Open Space Policies Map designation is noted. No further action required.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		60. We identify four further areas which should be added to the sites with protective environmental designations to make Policy O15.2 sound: Extend Open Space designation to the green space between Cricket Green road and Date Valley School/Brook House – this is recognised as Metropolitan Open Land but not Open Space	Officers have reviewed the suggestion and disagree that the open space boundary should be expanded. Cricket Green is designated open space as a playing pitch for cricket and the area of land to the east of Cricket Green Road does not meet this criteria. No changes recommended.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		Extend Metropolitan Open Land to include Mitcham Bowling Club and the whole of Bellamy's Copse adjacent to Canons Leisure Centre – this is recognised as Open Space	Officers have reviewed the suggestion and disagree that the MOL boundary should be extended, in line with the MOL criteria set out in the London Plan. No changes recommended.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		Extend Open Space designation to include all the green space within Glebe Court and all new green space created through the Rediscover Mitcham investment (which Merton Council has also committed to registering as a village green) – visible on the right	Officers have reviewed the suggestion and disagree that Glebe Court should be designated as open space in line with the criteria set out in the Green Infrastructure Study. The open space boundaries for Rediscover Mitcham and Clock Tower have also been reviewed and due to changes with the road layout here these boundaries have been updated and included on the Policies Map as open space.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		61. We believe Bellamy's Copse in The Canons should also be designated as a Site of Importance for Nature Conservation to make Policy O15.3 sound	Following on from comments in the Stage 2a consultation, this site was reviewed by an ecologist and has been designated in the Policies Maps as a SIN.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		62. These locations were not addressed in the Green Infrastructure Study despite our earlier representations and further work should be undertaken to strengthen the evidence base for the submitted Plan.	Following on from comments made in the Stage 2a consultation, officers reviewed these sites suggested and changes have been made where the sites are deemed to meet the criteria. The Merton Green Infrastructure Study was completed and published in 2020 and no further changes have been made to this document, although officers have reviewed some sites and recommended further changes where needed.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		63. We do not support the proposed removal of Site 26 (Ravensbury Arms) and 26a (Miller & Carter Steakhouse) from the Green Corridor. The car parks and ancillary external areas continue to provide this function which washes over the sites. The supporting Table wrongly states that "No" boundary changes are proposed to Mitcham Common's designations.	This objection is noted. The sites were reviewed and specific recommendations were made to remove these parts of the sites from Green Corridor as they do not meet the criteria. Officers have reviewed the supporting tables for the Policies Maps in the Appendix and the table set out in the Green Infrastructure Study 2020 and both are correct for these sites. No further changes are recommended.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Policies Map	Policies Map		64. We do not support the removal of an area of Site 24 (Wilson Hospital) used for the former drop-in centre from the Green Corridor and Open Space. This is a building with a temporary permission which has expired. Planning permission for the temporary walk-in centre building (14/P0825) was extended to 1 May 2017 by which time "the use hereby permitted shall cease and the land restored to its former condition." The building has not been removed and the land has not been restored. NHS Property Services has recently confirmed it has no plans to extend emergency use of the building beyond the end of 2021 after which it is required to be taken away and the ground restored. It would be perverse for these protective designations to be removed just as wider redevelopment of the site is being considered.	The proposed boundary changes are based on the site reviews in line with the criteria set out in the Green Infrastructure Study 2020, and recommended boundary changes were based on site surveys carried out. Officers have reviewed this in line with the comments made, but disagree with the suggested boundary change, as the building is currently on site. The remaining areas of the site remain as green corridor. No changes are recommended.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	Delivery			Implementation 80. There is a need for an additional section in the Local Plan on its delivery and implementation. This should include: Much more comprehensive requirements for monitoring than proposed in the Sustainability Appraisal Appendix A – including addressing the following: o A record of the "number of Listed Buildings at Risk" is wholly inadequate as a means for monitoring delivery of a broad based objective "To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings" o A record of "planning [sic] permission grant and completed" provides no meaningful monitoring insight at all on delivery of the objective "To make the best and most efficient use of land to support sustainable patterns and forms of development" o Monitoring information should not exclude "educational establishments" from the monitoring of the loss of open space to development – the merits of development for educational purposes is a matter for consideration through planning decisions and not a universal exception to an assessment of the success of the plan in delivering for open space and nature o A record of whether developments have been reviewed by the Design Review Panel at pre-application stage is wholly inadequate as a means for monitoring delivery of the objective "To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport" leaving aside the significant reservations we have about the quality of design review arrangements in Merton o Providing monitoring data to track delivery of an increasing tree canopy using i-Tree Canopy should be included o Establishing an expectation for pre-application community consultation on development proposals in accordance with the guidance in National Planning Policy Framework paragraph 128 that "Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot." o Clear requirements for the quality of information provided with planning applications to establish an expectation that material with clear errors and omissions will result in a planning application not being registered until rectified o A requirement that all pre-application advice, viability assessments and Design Review Panel reports will be published online alongside planning application documents o A clear commitment to enforcement of the planning system o Refreshing the online system for development management to replace Planning Explorer with a user-centric system, including provision for accessing planning information via online maps and including all representations made on applications, including from local residents o Priorities for the use of Community Infrastructure Levy o Support for any neighbourhood plans that come forward	We disagree that the delivery, implementation and monitoring regime is inadequate. The council undertakes comprehensive and thorough monitoring of development trends and changes every year and publishes these in its authority monitoring report. These include visiting usually more than 600 sites at various stages of development all across the borough; conducting a shopping survey of all town centres and neighbourhood parades annually (whether or not changes required planning permission); keeping a record of appeals and the policies on which they are allowed and dismissed; considering all non residential changes including those undertaken via prior approval. The Infrastructure Funding Statement also provides a clear record of what infrastructure is being funded and delivered in Merton
35	Mitcham Cricket Green Community and Heritage (MCGCH)	N/A			1. Mitcham Cricket Green Community & Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs. We are the civic society for this part of Merton and part of the wider civic movement through membership of the national charity Civic Voice. We have been closely involved in the development of the Merton Local Plan, Borough Character Study, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. Our approach to development and change in the area is established in the Cricket Green Charter which was refreshed in 2019 with the support of London Borough of Merton and local councillors (https://mitchamcricketgreen.org.uk/cricket-green-charter/). The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run local events including Mitcham Heritage Days and Community on the Green.	Noted
35	Mitcham Cricket Green Community and Heritage (MCGCH)	N/A			2. We made detailed representations in January 2021, January 2019 and January 2018 on Merton Council's call for sites at Stage 1 of the Local Plan review and the draft Plan for consultation at Stage 2 and Stage 2a. We recognise the Local Plan as a critical document for the future development and conservation of the area. We are still considering whether to support a neighbourhood plan for Cricket Green and progress on the Local Plan and its effectiveness in providing a distinct approach for Mitcham will inform our decision	Noted

35	Mitcham Cricket Green Community and Heritage (MCGCH)	N/A		<p>3. We acknowledge changes to the draft Plan which have been made in response to some of the issues we raised in earlier representations. Nevertheless, the Stage 3 draft for public examination fails to address many of the issues that have been raised repeatedly during the consultation process. We also have concerns over the robustness of the policy drafting and the public consultation process and that the Plan period is less than the expected minimum 15 years. As a result we conclude that the Local Plan is not sound and object to the document as it stands. We believe the Plan needs significant amendment before it can be adopted and that it should run to at least 2038 and be supported by a full evidence base and robust Sustainability Appraisal. We hope this can be achieved through public examination of the Plan. We are also aware that the National Planning Policy Framework was revised on 20 July 2021. This was after the Stage 3 Local Plan was agreed by Merton Council's Full Council on 7 July 2021. We would expect an assessment of the implications of the revised NPPF to be made available by Merton Council alongside a specific invitation to consultees to make representations on the implications.</p> <p>4. Our submission addresses those areas where we believe the Plan is not sound. It addresses not only the detail of policies but also the supporting text, the evidence base and the process through which the Plan has been prepared.</p>	Noted and addressed within individual representations
35	Mitcham Cricket Green Community and Heritage (MCGCH)	N/A		<p>Preparation of the Plan</p> <p>5. We do not consider the preparation of the Plan to be soundly based. It fails to test of soundness in being neither justified nor consistent with national policy including failing the requirement of national planning policy to "be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees" (NPPF, para 16c).</p> <p>6. The failures in the consultation process include: □ A failure to make the Sustainability Appraisal publicly available at the start of the Stage 2a consultation process as a result of leaving it password protected. □ Lack of access to key documents in the evidence base for the Plan which has obstructed effective public consultation – there was no information on the range of Local Plan research undertaken on the key public consultation pages for the Stage 2a consultation or Merton Council's general planning page and the link now available (https://www.merton.gov.uk/planning-and-buildings/planning/local-plan-research) was not available during public consultation. □ Errors in the information presented, ranging from maps depicting the wrong location for Merton's Opportunity Areas to missing text and incomplete sentences. □ A fragmented presentation to the consultation draft plan which was never available as a single document and parts of which were published at different times. □ Poor quality map reproduction which made key information, such as the Plan's Key Diagram, virtually illegible.</p> <p>7. It is bad practice not to have published a detailed audit of how the Plan has been amended in response to public consultation as part of the evidence base. The lack of attention to public consultation feedback even where it corrects errors in basic facts persists even at this late stage and undermines public trust in the robustness of the Plan's preparation to the point where we need further evidence on the rigour of the public consultation to consider the Plan to be soundly based.</p>	No further changes proposed. More than nine months of engagement and public consultation was carried out on Merton's local plan to inform its submission stage. This included a "call for sites" and two distinct stages of Regulation 18. At the second of these stages (Stage 2a which ran for over the statutory six weeks from 13th November 2020 until 1st February 2021, a website error left the sustainability appraisal password protected for two weeks and the council allowed late submissions on this matter to those that requested it. Merton's Local Plan webpage links directly to Merton's planning research webpage and has done so for +8 years. Evidence was either directly linked from within the Local Plan policies or if not, was clearly referenced and easily sourced from the council's local plan webpage or using a search engine. We apologise for errors that occurred during the drafting of the Local Plan.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	N/A		<p>Drafting of Plan and policies</p> <p>8. We have an overarching concern about the style and approach to the drafting of the planning policies. These are too often at such a level of generality that they will not help decision makers when exercising their planning judgement. Too many policies fail to meet the NPPF's requirement that the Plan should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" (NPPF, para 16). The Plan also fails to distinguish policies from the rest of the text, usually achieved through the use of tinted boxes. 9. The Plan remains riddled with errors including references to incorrect policy numbers, syntax errors, incomplete sentences and missing text, incorrect references to the National Planning Policy Framework, factual errors, a site allocated to the wrong area, omission of a nationally listed heritage asset, confusing use of different words to describe the same issue, supporting maps that are poorly and inconsistently referenced in the Plan and incorrectly named locations in the Borough. It is grammatically illiterate in places. These problems extend to the drafting of a number of the planning policies. 10. These concerns are exacerbated by the lack of integration across the Local Plan with different chapters seeming too independent of each other and presented in different ways. The disjointed nature of the Plan is re-enforced by its fragmented presentation, lack of a contents section or even title page, and unclear structure and the publication of different sections at different times during the consultation process. Remarkably Stage 3 is the first time the Plan has been made available as a single document. The evidence base for the Plan is also unclear and much is not available online or has not yet been completed or commissioned. This has also obstructed effective public consultation. 11. As a result of these inadequacies in the draft Plan's preparation and drafting we believe it is neither justified nor consistent with national policy and fails the test of soundness on both grounds.</p>	We disagree that the Local Plan is neither justified nor consistent with national policy. Policies are clearly distinguishable from the rest of the text and during the various consultation stages we have explored different methods for formatting the plan (including at Stage 2 the use of tinted boxes) to distinguish the policies from supporting text. The evidence base is available online and evidence has been added as it has been produced (e.g. the Strategic Housing Needs Assessment and Merton's Playing Pitch Strategy were both uploaded in 2019 when they were carried out; the Green Infrastructure Study in 2020 when it was finalised and the Infrastructure Delivery Plan in 2021 when it was finalised. It has been a difficult journey for many, including ourselves, to move towards a wholly digital setup and not continue to rely on paper copies which are formatted differently from web-based material. We created a dedicated webpage with different sections to allow users to focus on individual chapters within the local plan, and in response to consultation feedback at Stage 3 we also provided a combined copy of the Local Plan chapters. Greater digitisation was necessitated by Covid19 but is clearly government's direction of travel. To this end we are starting to produce Local Plan evidence and supporting guidance (e.g. Merton's Strategic Flood Risk Assessment and Merton's borough character study) using GIS storymaps and, subject to a successful examination, we aim to do the same with the Local Plan to make it easier to follow digitally and improve the mapping aspect (which is currently PDF based). We apologise for drafting errors within the Local Plan and we thank consultees for helping to address these.
35	Mitcham Cricket Green Community and Heritage (MCGCH)	N/A		<p>Plan period</p> <p>12. National planning policy is for the strategic policies of Local Plans to look ahead "over a minimum 15 year period from adoption" (NPPF, para 22). The Plan will not be adopted before 2022 at best and runs to 2036 which is a period of 14 years. On this basis we believe the Plan fails the test of soundness by not being consistent with national policy. We recommend it runs to at least 2038.</p>	No further change proposed at this time. The Reg19 Local Plan currently runs for 15 years from 2021-22 to 2035-36. However the council plans for a rolling five year land supply, updated annually with a new baseline, and we are confident that we will be able to demonstrate developable sites for years 6-10 and further housing supply for years 11-15 should the local plan be adopted after April 2022. We have also considered future infrastructure provision and we are confident that infrastructure provision will not be affected should the Local Plan be adopted in 2022-23 and therefore look ahead to 2036-37
35	Mitcham Cricket Green Community and Heritage (MCGCH)	01C Urban Development Objectives and Vision		<p>Spatial Vision and Objectives</p> <p>13. We generally support the Spatial Vision for Merton (page 32) and, in particular, the ambitions to reduce the disparities between the east and west of the Borough, respect local character, reduce pollution and improve access to the natural and historic environment. We have very low confidence in the ability of the Local Plan either to deliver this Vision or to reconcile the inherent tensions between achieving simultaneous economic, social and environmental progress. We believe the Vision fails the soundness test in that it is not effective in being deliverable over the plan period.</p> <p>14. One example is the failure to include any specific measures which will deliver the ambition to reduce disparities between the east and west of the Borough. The Vision is also lacking any commitment to protecting the existing scarce resource represented by Merton's green spaces, wildlife and heritage assets which is neither justified as an appropriate strategy nor consistent with national policy.</p> <p>15. An example of the lack of care and attention in the drafting and the failure to address consultation feedback is that the last part of the ninth bulleted point is still missing from the Vision despite earlier representations.</p> <p>16. There are a number of areas where the detail of the Plan fails to follow through on the ambition of its Strategic Objectives. For example, Strategic Objective 5 is for "supporting.....neighbourhood parades" but the inventory of "Neighbourhood parades in Merton" after paragraph 13.5.33 is both incomplete, despite earlier representations, and is shown inconsistently in the policies maps – e.g. 323-327 London Road is on Economy Policies Map - Business and Retail LR but does not appear on Economy Policies Map (Mitcam).</p>	No further change proposed. The vision is in line with national policy and is not required to reflect all aspects of it. For example Strategic Objective 2 "supporting resilience" part d reflects national and regional policy of protecting parks and improving access to nature. Additional modification recommended to ninth bullet point of Spatial Vision page 32 to delete IMPROVING SENSE OF The list of Neighbourhood Parades in Merton is not incomplete. The Plan should be read as a whole and the Neighbourhood Parades listed on page 462 are shown on Merton's Policies Map Economy and Retail section
36	Mitcham Society	N/A		<p>Mitcham Society has commented on the previous rounds of the Local Plan preparation, and now presents its comments on the stage 3 consultation. The Plan needs to address our recommendations for it to be considered sound. We are disappointed not to see this new Local Plan version referencing Mitcham Village. Our reasoning on recognising Mitcham centre in this way has been made clear in our previous submissions, and we reiterate them here.</p>	Noted. Comments are made to individual parts of the response below.
36	Mitcham Society	N/A		<p>Mitcham – a 21st Century Village As we have noted in previous submissions, Mitcham is a 21st Century village at its heart. Its central focus is what remains of Fair Green, extending to Figges Marsh, Three Kings Pond and Piece, and onwards to The Canons, Cricket Green and its various greens, and Mitcham Common. Mitcham Village has a clear physical identity and function that reflects its heritage and speaks to its role as a 21st Century village. Mitcham Village is under increasing development pressure, so it is vital that its village character is recognised, celebrated and supported in the Local Plan if it is not to become overwhelmed by development that is detrimental to its character causing it to become a bland 'anyplace'. Ours is not a nostalgic view. We are clear that our aspiration is for a 21st Century village which reflects the diverse, vibrant communities and cultures that make up the population of Mitcham, and sits well with the aspiration of the Local Plan to deliver 20-minute neighbourhoods. Mitcham Village today provides a range of retail and other facilities including banking, grocery and supermarket shopping, Post Office, vet, eat-in and takeaway food, optician, key-cutting, undertaker, two pubs, newsagents, estate agents, dentistry, and a street market. A high proportion of the retail offer is made up of independent stores. As the Local Plan points out, retail occupancy is high.</p>	Noted. This is not a comment on the policy. Further comments are considered by officers below.

36	Mitcham Society	04 Mitcham	N4.1		<p>Recommendation 1 The Mitcham Town Centre designation be removed from the Local Plan throughout and replaced with Mitcham Village. In our response to the Stage 2a consultation we said the Local Plan should: Renaname 'Mitcham town centre' as Mitcham Village on the Economic Policies map and a thorough the entire of the Local Plan. This has not taken place. We are aware of suggestions that Merton Council's hand has been forced in this by the London Plan. Indeed the current draft Merton Local Plan states, on p22 "Mitcham town centre is designated as a District Centre..... In the London Plan (London Plan Table A1.1 – Town Centre Network)". This is indeed the case. However, an examination of Table A1.1 (London Plan page 476) reveals that there are two villages named in Table A1.1 - Carshalton Village and Cheam Village. Both are classified as District Centres. Both are in the London Borough of Sutton – an adjoining borough. Both Carshalton Village and Cheam Village have considerable similarities to Mitcham Village sharing characteristics such as small scale development, a mix of buildings of different ages, local independent shops, and surrounding green spaces. Carshalton Village a pond. We conclude not only that there is absolutely no justification for arguing that it is not possible to designate Mitcham Village because of precedent or direction in the London Plan, but indeed that there is an evidence base to show that precisely the opposite is true. It is possible to designate Mitcham Village, the London Plan's two such designations are in a neighbouring borough, and both share many characteristics with Mitcham Village. The London Plan presents no barrier. In addition to representations to previous versions of the Local Plan, we have also made representations to various other fora on this matter including regarding the Borough Character Study (including to public meetings and to the Borough Plan Advisory Committee). It is entirely wrong not to recognise Mitcham Village. In failing to do so the Local Plan: Misses opportunities to celebrate the village character in its approach to all development, potentially opening up opportunities for the many sites identified in the Local Plan to proceed in a piecemeal fashion without respecting the low rise, village vernacular (including the green and blue infrastructure that includes the Village Green (Fair Green), and the Village Pond (Three Kings Pond, facing another green – Three Kings Piece) Misses opportunities for the public realm, which needs to be protected, preserved and enhanced. A village scale public realm is much more subtle and nuanced than that of a town centre. Recognising Mitcham Village would, for example: oAllow greater weight to be given to the green spaces within and abutting Mitcham Village (including the long awaited yet still not completed designation of Fair Green as Registered Town Green). oInherently lend a greater understanding of the importance of the Village Pond and improved public realm connectivity between it and Fair Green. oGive greater weight to the market, which has been sorely neglected and which could be a thriving centrepiece to the village setting. oOverall, emphasise the importance of small scale public realm interventions such as floral displays, adequate seating, the provision of long awaited public toilets (promised in the Rediscover Mitcham project which the Local Plan points to as a success, but never delivered), and shop front improvements. While these types of interventions can happen in town centres, their scale and form in a village setting is rather different from that in a larger town centre setting. oEnsure appropriate recognition of the range of independent shops, and their low rise, relatively small footprints. Preserving what exists and enhancing the offer with new independent shops would project Mitcham Village into the future as a unique and special place. All of this should be seen in the context of the Covid-19 pandemic, which has seen a rise in the use of local facilities for shopping, for leisure and for exercise. There is much said in the Local Plan and in wider planning policy about how we can build on the idea of the 20-minute neighbourhood. Indeed, as recommended by us, policy N4.1 now explicitly states: "c. Improve access to, and movement through, Mitcham town centre by encouraging walking, cycling and public transport that improves links to surrounding neighbourhoods and supports the vision of a 20-minute neighbourhood and improving air quality." [Our</p>	<p>No further change proposed. Renaming an area or street is not a matter for planning policy; neither the NPPF nor the Local Plan define a "village". Mitcham is one of London's many district centres in planning terms. the 2003 Local Plan contained a policy on "Mitcham Urban Village" but this has not been taken forward through successive local plans. If an area is renamed during the lifetime of this local plan; we will take this into account at the local plan review</p>
36	Mitcham Society	Policies Map	Economy and Town Centre		<p>Recommendation 2 Our proposed Eastern extension be included in the Mitcham Village (currently called Mitcham Town Centre) map and all maps are checked to ensure they reflect this change The Economy Policies Map – business and Retail LR identifies an area it describes as Mitcham town centre, and within this marks out the primary shopping area. We note that there has been some change to the delineation Mitcham Town Centre for the Stage 3 consultation, which has taken into account some of our recommendations, but not all of them. In our response to the Stage 2a consultation we said the Local Plan should: Make two extensions of the area identified within the Local Plan as Mitcham town centre – described below and shown as (red) annotations of the Local Plan's map comprising: a.An extension of the town centre area to the North to embrace Mitcham Library on one side of London Road and the Monarch Parade shops on the opposite side of London Road. Both are physically and functionally part of Mitcham Village. b.An extension to the East to embrace Three Kings Pond and the terrace cottages of Commonsides East which form a natural part of Mitcham Village. We note that on the Economy Policies Map – business and Retail LR the Northern extension has been made, but the Eastern extension has not: [refer to image] We wish to see the Eastern extension also added. It is important to recognise that this designated area is not just about economic activity. Cultural, social and environmental factors are also important. By including the Village Pond and terraced cottages alongside Commonsides East the designated area will recognise different types of asset that contribute to the character of Mitcham Village. All maps in the Local Plan should be checked to make sure they all reflect this change.</p>	<p>No further change proposed. The Mitcham town centre boundary is focussed closely to the primary shopping area. Further extensions to increase the size of the town centre to the north and east are not supported. Town centre retailing in particular has seen a retraction and although Mitcham has suffered less than others from increasing vacancies, extending the town centre to include other shopping parades and functions to the north is not justified. Extending the town centre to cover Three Kings Pond to the east is also not justified - while there is some footfall from the town centre to Mitcham Common there isn't a significant further attractor in this direction that would justify the town centre's extension.</p>
36	Mitcham Society	04 Mitcham	N4.1		<p>Recommendation 3 Changes to Mitcham Policy N4.1 As already noted we wish to see Mitcham Village replace Mitcham Town Centre as the designation. This is pertinent to policy N4.1 and throughout the entirety of the Local Plan. We are pleased to see – as noted above – that policy c for what we define as Mitcham Village now includes measures which support "the vision of a 20-minute neighbourhood", as we recommended, and that this is repeated in the section of the policy covering the surrounding areas (point n). However, we also wish to see policies which emphasise how the Mitcham Village character will be protected and enhanced. Some policies are currently clearly counter to this. We are concerned about section of point d "mixed use developments with homes above shops in the town centre." In principle we support this. We want to see it strengthened by including clarity on building height restrictions and clarity on design quality. We want to see explicitly stated in the policy that: a.All new development within the boundary of Mitcham Village should: i.Recognise, value and protect the character of Mitcham Village ii.Enhance and strengthen the character of Mitcham Village iii.Actively promote and support Mitcham Village b.All new development within the boundary of Mitcham Village should be discouraged if it: i.Disrupts or damages the existing elements which characterise Mitcham Village ii.Detracts from the continuation of a village feel in Mitcham iii.Over urbanises, including through excessively high or dense development iv.Removes green spaces v.Prioritises the 'generic' over the local, special and unique c.All new development which borders the boundary of Mitcham Village should do no harm to the village but instead act as an appropriate gateway to this characterful area.</p>	<p>No further change proposed. As already stated there are no proposals to rename Mitcham as Mitcham Village and this could take place outside the planning system if desired. There is already reference to design quality in Mitcham and in Chapter 12 - Places and Space in a Growing borough. Plans should be positively prepared and negative policy wording is to be avoided.</p>
36	Mitcham Society	04 Mitcham	N4.1		<p>Recommendation 4 Mitcham Policy Justification – 20-minute neighbourhood It is disappointing that the first few points in the justification section are focused on the economy. Of course economic success is important. But the economy is one aspect of civic life, and Mitcham Village – as the Plan makes clear – is an aspirational 20-minute neighbourhood. It is this characteristic which should lead the Justification, and that will mean an emphasis on cultural, social and environmental factors, on green and blue infrastructure, and on design, built form and the public realm as well as economic factors. The justification should lead on the 20-minute neighbourhood aspiration, and all that follows should relate clearly to it.</p>	<p>The supporting text also includes information on improvements to the public realm and access for walking and cycling. No changes proposed.</p>
36	Mitcham Society	04 Mitcham	N4.1	4.1.3	<p>Recommendation 5 Mitcham Policy Justification – Rediscover Mitcham Point 4.1.3 fails to note that the Rediscover Mitcham investment promised public toilets and a rejuvenated market. Neither has been delivered. Both are vital to bringing people in to Mitcham Village and supporting the 20-minute neighbourhood aspiration. This point should be revised to reflect the missing elements, and explain how these will be delivered.</p>	<p>No further change proposed. The Rediscover Mitcham programme supported Mitcham Market for the lifetime of the funding. Pre Covid19 Merton's community toilet scheme supported permises in Mitcham to provide toilet facilities free of charge.</p>
36	Mitcham Society	04 Mitcham	N4.1	4.1.3	<p>Recommendation 6 Mitcham Policy Justification – footfall Point 4.1.3 suggests that the changes made during the Rediscover Mitcham activity have created extra footfall. There is no evidence presented for this. This point should be revised to include evidence for additional footfall created. It should include the 'before' and 'after' footfall survey data. If none exists, this point is disingenuous and should be removed.</p>	<p>No further change proposed. The Rediscover Mitcham programme provided a bus road link through the previously pedestrianised centre of Mitcham along London Road and running through Mitcham Fair Green. This has created three new bus stops on the previously pedestrianised route alone, supporting 10 different bus services including one night bus. Previously these 10 bus routes did not pass through the Fair Green as it was pedestrianised. More businesses have opened along the previously pedestrianised section of London Road since the Rediscover Mitcham programme introduced the 10 bus routes to this location. It is accurate to state at 4.1.3 that the Rediscover Mitcham investment has "... opened the bus lane and helped drive extra footfall to businesses around the Fair Green"</p>
36	Mitcham Society	04 Mitcham	N4.1	4.1.6	<p>Recommendation 7 Mitcham Policy Justification – active frontages Point 4.1.6 asserts that ground floors of commercial developments need to be flexible in order to accommodate uses we might not associate with high streets. We agree that the nature of centres is changing, and that a mix of usages is required. We note that active, accessible frontages are flagged as important. However we do not feel the need for active frontages is asserted strongly enough. There is plentiful evidence – including within Merton – of shop fronts being turned into housing, removing active frontages. It is important to assert strongly and emphatically that new development within Mitcham Village's current shopping streets that removes an existing active frontage, or that creates non-active frontages in an area which is characterised by them, will be discouraged. This should be reflected in Policy N4. very clearly.</p>	<p>Specific design policies on Active Frontages are included in Chapter 12 Places and spaces in a growing borough. Officers do not feel it is appropriate to repeat these in the area policies. No changes proposed.</p>

36	Mitcham Society	04 Mitcham	N4.1	4.1.9	<p>Recommendation 8 Mitcham Policy Justification – building height Point 4.1.9 suggests that higher rise accommodate is “a contrast to the surrounding terraces and semi-detached houses.” The word ‘contrast’ is value free: a contrast can be positive or negative. We only want to see new build that adheres to the strictest design code and is of height appropriate to its surroundings. In Mitcham Village this means no more than 4 storeys. We understand the need to create new homes, and the pressure Merton is under to deliver. We believe that new homes can be delivered alongside preserving character and ensuring the highest quality design requirements are met.</p> <p>We note that elsewhere in the Local Plan Mitcham’s Glebe Court is cited as a development which provides “architectural variety” (Policy D12.6 Tall Buildings, p408) Key characteristics of Glebe Court are that it is set back from London Road by landscaped gardens, that blocks are in an open, grassed and landscaped setting, and that even in the heart of the estate, there is a feeling of openness and space to breathe. These key design characteristics are central to providing density of homes, notably, but not only, in the context of providing the open space and green infrastructure that 20-minute neighbourhoods require. Use wording that is not neutral – replace ‘contrast’ with more meaningful language. Be clear on the need for local design codes and the need for development to do more to enhance their settings and surroundings. Be clear that there are expectations on the design and height of new development within Mitcham Village.</p>	<p>Merton recognises the value of design codes.</p> <p>Policy D12.1.a makes direct reference to the NPPF which references both the National Design Code and National Design Guide. Direct reference within the policy to the National Design Code and National Design Guide is not needed. Additional justification text D12.1.8 has been introduced to signpost directly to the relevant sections of the NPPF that highlight the National Design Guide and National Model Design Code to add further clarity to the policy.</p>
36	Mitcham Society	04 Mitcham	N4.1		<p>Recommendation 9 Mitcham Policy Justification – green and blue infrastructure and public realm There is no point in the justification specifically covering design, the importance of continuity, or the relationship of buildings to green and blue infrastructure or the public realm. This is a major failing and should be addressed. It is particularly important given the number of sites identified which could accommodate significant numbers of homes. Mitcham must not become a bland anyplace in the race to meet housing targets, and both the policy and the justification need to be clearer on this point. While these matters are covered in other policies, we feel clear unequivocal commitments should be made in both policy N4.1 and the justification on: a.Green infrastructure b.Blue infrastructure c.Public realm d.Design quality and continuity</p>	<p>Officers consider that the Local Plan has been prepared in accordance with national guidance and do not agree that specific policies should be repeated. All relevant policies in the Local Plan are applicable for the assessment of a planning application and the duplication of policies is not recommended. Chapter 12 covers Design and public realm policies, Chapter 15 covers Green and Blue Infrastructure policies and</p>
	Mitcham Society				<p>For the absence of doubt we reiterate the point made at the start of this submission. The Plan needs to address our recommendations for it to be considered sound.</p>	<p>Officers have reviewed each of the recommendations put forward in this submission and each one is responded to above. Officers consider that the plan is sound</p>
37	National Grid	03 Colliers Wood	CW2	Page 91	<p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. CW2 –CarPark South of Britannia PointYYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON -WIMBLETON 1</p>	<p>A meeting was held with National Grid and Avison Young on 25/10/2021 to discuss their representation. It was agreed at the meeting that the following additional wording should be added to the Site Allocation to offer appropriate protection to National Grid assets: “This site is in close proximity to National Grid infrastructure YYU route 275Kv two circuit route from Beddington substation in Sutton to Wimbledon substation in Merton. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.” This Site Allocation had previously not been identified by National Grid as significant, however officers agree that the above wording should be included.</p>
37	National Grid	03 Colliers Wood	CW5	Page 101	<p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. CW5 -Priory Retail ParkYYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON -WIMBLETON 1</p>	<p>A meeting was held with National Grid and Avison Young on 25/10/2021 to discuss their representation. National Grid has confirmed that the wording in the relevant Site Allocations offers appropriate protection to National Grid assets and they do not have any objections. Officers do not propose any changes.</p>
37	National Grid	04 Mitcham	Mi1	Page 118	<p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Mi1 -Benedict WharfYYU ROUTE: 275Kv Overhead Transmission Line route: BEDDINGTON -WIMBLETON 1</p>	<p>A meeting was held with National Grid and Avison Young on 25/10/2021 to discuss their representation. National Grid has confirmed that the wording in the relevant Site Allocations offers appropriate protection to National Grid assets and they do not have any objections. Officers do not propose any changes.</p>
37	National Grid	09 Wimbledon	Wi12	Page 306	<p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Wi12–WimbledonStadium and Volante Site33Kv Underground Cable route:EARLSFIELD RAIL FEEDERS 427, 440 & 443 - SECTION33Kv Underground Cable route: WIMBLETON 33KV D S/SElectrical Substation: WIMBLETON 132KV</p>	<p>A meeting was held with National Grid and Avison Young on 25/10/2021 to discuss their representation. It was agreed at the meeting that the following additional wording should be added to the Site Allocation to offer appropriate protection to National Grid assets: “This site is in close proximity to National Grid infrastructure 33Kv Underground Cable route Earlsfield Rail Feeders 427, 440 & 443 Section 3 and 33Kv Underground Cable route Wimbledon 33Kv D S/S Electrical Substation Wimbledon 132KV. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances, the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. It is recommended that the developer liaise with National Grid at the earliest opportunity to discuss the infrastructure on site. The council will require evidence of liaising with National Grid with any submitted planning application.” This Site Allocation had previously not been identified by National Grid as significant, however officers agree that the above wording should be included.</p>
38	Natural England	N/a			<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 23rd July 2021 . Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>	<p>Noted</p>
39	NHS Property Services	04 Mitcham	Mi8		<p>The Wilson Hospital is located at Cranmer Road and measures 1.81 hectares, containing a collection of permanent and temporary buildings with a total floorspace of 5,480 sq m. In accordance with representations previously submitted by NHSPS, dated January 2018, January 2019 and February 2021, the clinical and planning strategy is for a health campus to be developed on the Wilson Site, alongside residential development on any land not required for this new facility.The Wilson Site has a draft allocation under reference Mi18. The principle of the allocation for the site is supported by the NHSPS. The draft Stage 2 allocation, set out the potential use of the site, issues and opportunities. The Stage 2a consultation established ‘Design and accesibility guidance’ to assist in the proper planning of a mixed-use healthcare / residential development. This Stage 3 consultation modifies some of the allocation wording and includes an additional section on Infrastructure Requirements. Our previous representations set out our understanding of the existing development constraints on site. The draft allocation includes a summary of these, and we will continue to recognise them as part of future design and development of the Site.Our evolving plans are intended to revitalise the site and provide a more attractive, healthy and welcoming environment. We would however stress that a key component of funding new health care facilities will be maximising the residential development potential of the site and the recycling of capital released into the new health care facility. A pragmatic balance must therefore be struck between the constraints and opportunities offered by this site, with improved health services for the local community contingent on a viable amount and type of residential development being secured. A thorough assessment of these constraints will form part of any future planning application process.</p>	<p>Noted.</p>
39	NHS Property Services	04 Mitcham	Mi18		<p>Our proposed amendments to site allocation Mi18 are set out below. Suggested deletions are show as astrikethrough and additions in <i>red italics</i>. [see original response for full table - extract here only focusses on amendments. No amendments were proposed to the rest of the site allocation]</p>	<p>Noted</p>
39	NHS Property Services	04 Mitcham	Mi18		<p>Site owner National Health Service (NHS)<i>NHS Property Services (NHSPS)</i> - Justification: NHSPS is the freehold landowner of the Wilson Hospital site.</p>	<p>Additional modifications to clarify that the site owner is NHS Property Services (not National Health Property Services)</p>

39	NHS Property Services	04 Mitcham	Mi18		Site deliverability: 5-10 years <i>0-5 years</i> . Justification: Potential to deliver within the 5-year period.	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity
39	NHS Property Services	04 Mitcham	Mi18		Design and accessibility guidance: Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area. Healthcare with community and enabling residential development, or residential if the existing services are relocated within an alternative healthcare facility. Development of the site is an opportunity to either provide a health centre/community health centre in a neighbourhood with health inequalities/ poor health and/or to provide new homes in an area of housing need (if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham) Justification: The Design and accessibility guidance as worded reads as though the site is not capable of delivering a mix of healthcare and residential uses and is therefore inconsistent with the 'Site allocation' wording, which allows for this mix.	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity.
39	NHS Property Services	04 Mitcham	Mi18		Infrastructure requirements: To ensure that adequate healthcare provision is delivered in this area <i>clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS</i> and that there is no loss of potential NHS sites capacity until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital site or Birches Close sites. Justification: The Site allocation wording recognises that residential development on the Wilson site will 'enable' the delivery of the new health facility. Seeking to control phasing of certain uses on the Wilson site could undermine the purpose of enabling residential development and delivery of vital health services for the community. To confirm, NHSPS property or land can only be released for disposal for alternative/non health care use once Commissioners have confirmed that the land is no longer required for the delivery of NHS services. The Council will therefore receive comfort that the health requirements of residents will be met as the site progresses through any pre-application meetings and rounds of public engagement. NHSPS believe that this progression can be achieved through proactive engagement rather than a physical start on site. Moreover, NHSPS believe that the draft Policy IN14.2, which now recognises 'wider public service transformation plans' when considering the reorganisation of health facilities is sufficiently robust to manage redevelopment proposals on the Wilson site.	The east of Merton (in which Birches and Wilson are located) has some of the worst health outcomes as documented in Merton's Joint Strategic Needs Assessment. Cricket Green ward (in which both are located) is the most deprived ward in Merton. For more than 12 years the NHS (in various forms) has had proposals to consolidate services at one of these sites and provide housing on the other. Merton Council supports this - in 2011 in response to the then Merton Primary Care Trust (PCT) the council recorded the Wilson Local Care Centre as strategic infrastructure in Merton's Core Planning Strategy; in 2014 we allocated both sites in Merton's Sites and Policies Plan. The council is clear that it does not want to see any loss of NHS capacity in the east of the borough at any stage by the redevelopment of these two sites. Draft policy IN14.2 is in draft at present; these two sites are owned by the NHS; they provide NHS services and the purpose of the allocation is to support their redevelopment but crucially ensure no loss of capacity while this is taking place. We believe this is too important not to be part of the proposed site allocation, as it has been since 2014.
39	NHS Property Services	04 Mitcham	Mi2		Site Allocation Mi2 – Birches Close The Birches ("the Site") is located at Birches Close, Mitcham. The Site measures 0.969 hectares and comprises a cul-de-sac with eight buildings of varying size arranged off Birches Close. This Site is in Mitcham Cricket Green Conservation Area. As with The Wilson, the Birches is owned by NHSPS.	Noted
39	NHS Property Services	04 Mitcham	Mi2		The Birches has a draft allocation under Mi2. The principle of the allocation of the site continues to be supported by NHSPS. However, we remain opposed to the suggested trigger that a new Mitcham healthcare facility must be built and operational before any redevelopment can progress on the Birches Close site.	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity
39	NHS Property Services	04 Mitcham	Mi2		It is understood that the Council require comfort that the long-term health needs of the local community can be met. As with The Wilson, NHSPS cannot dispose of land or buildings until declared surplus by NHS Commissioners following a robust assessment of local health care needs. Under this proposed allocation, the Birches Site could lie dormant, with no development coming forward for a considerable period while the more complex Wilson site is developed then opened. Both the Wilson and Birches are individual development sites for planning purposes with their own specific site constraints. Delaying NHS consolidation strategies would neither assist the NHS with their strategic objectives, nor the Councils need to deliver housing and would be incompatible with draft Policy IN16.2. Furthermore, significant costs are incurred when holding and securing sites, often to deter antisocial behaviour and vandalism, something the Council will want to avoid. There is also a risk that any planning permission secured on the Birches site would lapse as construction is completed on the Wilson. This would not be in either the interest of the Council or the NHS and could result in wasted public funds and time. We would therefore suggest that the trigger point is removed or amended to ensure the allocation is positively prepared.	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity.
39	NHS Property Services	04 Mitcham	Mi2		Site owner National Health Service (NHS) NHS Property Services (NHSPS) Insert for consistency	Additional modification made to correct site owner
39	NHS Property Services	04 Mitcham	Mi2		Site allocation - NHS PS support the proposed site allocation wording	Noted
39	NHS Property Services	04 Mitcham	Mi2		Site deliverability: 5-10 years <i>0-5 years</i> . Justification: Potential to deliver within the 5-year period.	No further change proposed. No evidence has been provided by the site owner to show that this site can be delivered within 0-5 years. If further evidence comes forward, the council will reconsider
39	NHS Property Services	04 Mitcham	Mi2		Indicative site capacity (new homes) [no change] Justification: NHSPS support indicative capacity.	Noted
39	NHS Property Services	04 Mitcham	Mi2		Design and accessibility guidance: Residential, following the relocation of existing services, completion and opening of a healthcare facility in the Mitcham area. Healthcare with community and enabling residential development, or residential if the existing services are relocated within an alternative healthcare facility. Development of the site is an opportunity to either provide a health centre/community health centre in a neighbourhood with health inequalities/ poor health and/or to provide new homes in an area of housing need (if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham) Justification: The Design and accessibility guidance as worded reads as though the site is not capable of delivering a mix of healthcare and residential uses and is therefore inconsistent with the 'Site allocation' wording, which allows for this mix.	No further change proposed. Responses to the Local Plan up until the end of Stage 2a (February 2021) from NHS Property Services did not contain information to support the de-linking of the two sites. The Merton Borough Estates Strategy 2021 does not set out this approach. At the time of writing there is no publicly available decision that we can see to retain clinical capacity locally while allowing the redevelopment of the NHS-owned sites that are not needed to maintain or increase clinical capacity.
39	NHS Property Services	04 Mitcham	Mi2		Infrastructure requirements: To ensure that adequate healthcare provision is delivered in this area <i>clinical capacity must be maintained through relocation/reprovision when and where needed as identified by SWLCCG/ICS</i> and that there is no loss of potential NHS sites capacity until this happens, the new Mitcham healthcare facility must be built and operational before redevelopment can progress on either the Wilson Hospital site or Birches Close. Justification: NHSPS believe draft Policy IN14.2 is sufficiently robust to manage any future development for an alternative use on the Birches site. To satisfy this, the Council will be in receipt of a Community Needs Statement and justification that any proposals form part of a wider public service transformation plan. It is unclear why additional control is sought in respect of both the Wilson and Birches sites, given the criteria for a Community Needs Statement set out in draft para 14.2.15 does not require a new facility to be 'built and operational' prior to the redevelopment of an existing one. In the spirit of the recently updated London Plan (2021), Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to identify opportunities to make better use of existing infrastructure and facilitate the release of surplus buildings and land for other uses. Indeed, National Planning Policy (NPPF paragraph 60) is clear that: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." (Our emphasis) If an arbitrary restriction is placed on the redevelopment of the site, it cannot be said that the that land with permission is developed without unnecessary delay. Thus the site allocation as currently drafted would not be consistent with national, regional or draft local policy.	The east of Merton (in which Birches and Wilson are located) has some of the worst health outcomes as documented in Merton's Joint Strategic Needs Assessment. Cricket Green ward (in which both are located) is the most deprived ward in Merton. For more than 12 years the NHS (in various forms) has had proposals to consolidate services at one of these sites and provide housing on the other. Merton Council supports this - in 2011 in response to the then Merton Primary Care Trust (PCT) the council recorded the Wilson Local Care Centre as strategic infrastructure in Merton's Core Planning Strategy; in 2014 we allocated both sites in Merton's Sites and Policies Plan. The council is clear that it does not want to see any loss of NHS capacity in the east of the borough at any stage by the redevelopment of these two sites. Draft policy IN14.2 is in draft at present; these two sites are owned by the NHS; they provide NHS services and the purpose of the allocation is to support their redevelopment but crucially ensure no loss of capacity while this is taking place. We believe this is too important not to be part of the proposed site allocation, as it has been since 2014. If NHS PS can demonstrate that NHS services can be relocated / reprovided elsewhere prior to their loss at the Wilson or Birches, then we will consider this. At this time this information has not been provided to support an amendment to the Local Plan.
39	NHS Property Services	04 Mitcham	Mi18		Indicative site capacity (new homes) [no change] Justification: NHSPS support this inclusion. Residential site capacity will be determined through design progression and dependent on the location and amount of healthcare floorspace required on site	Supported noted
39	NHS Property Services	05 Morden	Mo4		NHSPS support site Mo4 and welcome the recognition that a health services must be considered as a policy requirement given the level of housing and population growth in the Regeneration Zone and the wider area. The NHS must receive an equitable share of developer contributions and or Community Infrastructure Levy funds in the Zone. This will be required to contribute to the cost mitigating the impacts of population growth in the Morden Regeneration Zone.	The site allocation text does refer to the likely need for a health infrastructure contribution and a modification made improves the clarity of the need for developers to refer to the council's Infrastructure Development Plan.
39	NHS Property Services	05 Morden	Mo5		We also support the allocation for Site Mo5, subject to the commissioning needs and requirements of SWLCCG/ICS	Noted

39	NHS Property Services	06 Raynes Park	RP1		Raynes Park SITE RP1: Amity Grove Clinic, Amity Grove, Raynes Park, SW20 0LQ. Amity Grove is no longer owned by NHSPS and therefore the site ownership should be amended for accuracy.	Additional modification proposed to remove NHS property services from this site owner
39	NHS Property Services	14 Infrastructure	IN14.2		Chapter 14 Infrastructure Policy IN16.2 Social and Community Infrastructure In our response to Stage 2a, we recommended the inclusion of wording to allow public service transformation plans to be taken into account when assessing the loss of vacant health buildings. This inclusion would ensure draft Policy IN14.2 would be consistent with part F 2 of Policy S1 Developing London's social infrastructure of the New London Plan. NHSPS note and support the inclusion of the wording 'unless it forms part of a wider public service transformation plan' in Part b.ii, which will ensure the NHS is not subject to onerous marketing periods which delay vital investment in new and improved health services and facilities. NHSPS support HUDUS comments on Chapter 10 Health and Wellbeing and Chapter 12 Places and Spaces.	noted
39	NHS Property Services	all			Merton New Local Plan: Stage 3: 22 July 2021 – 6 September 2021 Thank you for the opportunity to comment on the above document. These representations are made by NHS Property Services (NHSPS) to the London Borough of Merton ("the Council") in respect of their New Local Plan Stage 3 Consultation. They follow on from representations made by NHSPS on: Stage 1: October 2017 – January 2018 Stage 2: October 2018 – January 2019 Stage 2a: 13 November 2020 – 1 February 2021 We ask that this response be read in conjunction with those comments previously made on Stage 1, Stage 2 and Stage 2a. Comments on this Stage 3 consultation are focused on land and property owned by NHSPS and policies which may affect future development proposals. We have also worked with the Healthy Urban Development Unit (HUDU) in respect of our representation and support their submission. Foreword NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS. A key part of NHSPS' role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners, care providers and local councils to identify and respond to local healthcare and property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, NHSPS is required to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by NHS Commissioners. This has resulted in the sale of 441 surplus properties, generated £381 million of sales receipts for the public purse and contributed to land sales supporting 6,607 housing units since April 2013. Background NHSPS is the freehold landowner of health facilities in Merton and detailed representations have previously been made in support of draft site allocations on NHSPS sites. These Stage 3 representations review the site allocations, where they remain relevant, taking account of comments previously made, current commissioning strategies and proposed land use allocations.	Noted
39	NHS Property Services	All			Closing NHSPS will work collaboratively with the Local Planning Authority with regards to the delivery of intentions for the CCG, across both the Wilson Hospital Site and the Birches. We trust these representations are informative at this stage of the new Local Plan preparation and will be taken into consideration. Should you require any clarification on the issues raised in these representations, please do not hesitate to contact myself	noted
40	Parkside Residents Association	01B Good Growth			3.5 Under Ch. 01B "Good Growth Strategy" of the Draft Local Plan, it is stated (p11) that: "Our heritage assets and historic environment are irreplaceable and an essential part of what makes Merton a vibrant borough and their effective management is a fundamental" and that (p12) "The Mayor will be developing a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth. Merton Council support this approach and will work with local communities, the Mayor and partners to protect and enhance our rich heritage." We assume that these policies reflect a genuine commitment on Merton's part. If so, they should be referenced in Site Allocation W13	Specific policies on design and heritage are contained within Chapter 12 Places and spaces in a growing borough. The Site Allocation also identifies if a site is located within a Conservation Area or impacts on listed buildings. Officers do not consider these need to be repeated in site allocations. No changes proposed.
40	Parkside Residents Association	09 Wimbledon	W13		The membership area of the Parkside Residents' Association comprises over 320 households and includes roads which adjoin the landholding of the All England Lawn Tennis Club (AELTC) to the west of Church and Somerset Roads. Almost all of the membership area is within the Wimbledon North Conservation Area.	Noted
40	Parkside Residents Association	09 Wimbledon	W13		Having reviewed the content of the final draft (Stage 3) of Merton's Draft Local Plan, and in particular the Site Allocations, we object to the proposed inclusion within Site Allocation W13 (see Ch 09 pp282-285 inc) of the AELTC's landholding in Wimbledon Park on the eastern side of Church Road, currently in use as the Wimbledon Park Golf Course (although golfing use is due to end in 2022) and the terms upon which it is included. The purpose of Site Allocations in a Local Plan is to identify sites with opportunities for development. In our view, the inclusion of this area within this Allocation is inappropriate as this conflicts with National, London and Merton's own local planning policies as well as policies applicable to historic sites such as this with significant Heritage status. Our reasons are summarised below.	Noted. Site Allocation W13 proposes a site allocation for "world class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake. Sports and recreation facilities can locate on land designated as Metropolitan Open Land (MOL) subject to careful consideration in terms of their effects on MOL. This is echoed in London Plan policy S5 Sports and Recreation where part D states Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G2 London's Green Belt, Policy G3 Metropolitan Open Land and Policy G4 Open space) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have. Officers do not propose any changes
40	Parkside Residents Association	09 Wimbledon	W13		1. Failure to recognise the protected planning policy status applicable to the AELTC's landholding on the eastern side of Church Road (the Park) 1.1. The whole of Wimbledon Park which lies to the east of Church Road and including the area within the AELTC's ownership, is part of an historic parkland designed by Capability Brown. The Golf Course land within the Park owned by the AELTC is an important and significant site, characterised as attractive, green open space with long fairways and varied topography affording clear views of surrounding historic buildings such as St Mary's Church to the south east. It is protected as Metropolitan Open Land (MOL) which is the urban equivalent of Green Belt, a designated Grade II* Listed Heritage Asset, a Site of Importance for Nature Conservation and within a Conservation Area. These designations, and the planning policy framework which supports them, are all intended to protect sites from development; the present golfing sporting use and the modest infrastructure it requires clearly respect those designations. The requirement in the Allocation's Design and Accessibility guidance (see Ch.09 p283) for "development" to be permitted, including to upgrade and improve AELTC's facilities to continue the prominence of the Championships..." may have relevance to the AELTC's landholding on the western side of Church Road where its principal facilities are located, but it is wholly inappropriate for, and very much at odds with, the protected status of the land on the east side of Church Road.	Noted.
40	Parkside Residents Association	09 Wimbledon	W13		1.2 Site Allocation W13 includes the AELTC's landholdings on both the east and western sides of Church Road and, as acknowledged in para 9.1q of the Local Plan, considers both, in effect, as a single area suitable for long term development to "support the continued upgrade and improvement of the AELTC's facilities...to maintain its global position as the best grass Grand Slam tennis competition.....". In our view this is a flawed approach; prioritising the AELTC's ownership of both areas as a single entity fails to recognise the distinct and contrasting features of the two areas and the separate approach which should therefore be adopted for the planning policy oversight of their long term future. Specifically	Noted. The local plan recognises the planning policy designations at the AELTC site east of Church Road (historic park and garden, Metropolitan Open Land etc) and does not propose to remove these. Any proposed development in line with the site allocation must be capable of delivering
40	Parkside Residents Association	09 Wimbledon	W13		1.2.1 The multi-layered protected policy status of the undeveloped open space of the Golf Course land to the east of Church Road is noted above; there are no "AELTC facilities" on this land which might be available for upgrading or improvement as it has only recently become available to the AELTC following its buy-out of the Wimbledon Park Golf Club from the members on terms which will bring the golfing use to an end	Noted. AELTC are the landowner of the site to the east and west of Church Road.
40	Parkside Residents Association	09 Wimbledon	W13		1.2.2 In contrast, the land to the west of Church Road, including the site on Somerset Road housing a large indoor courts complex and other facilities, has been in the AELTC's ownership since the 1920s and is usually called its "main site". It comprises show courts, tournament infrastructure buildings, a media centre, event hospitality facilities, underground car parking, indoor and outdoor courts and other private facilities for the AELTC's members as well as a Museum open to the public. Over the years this site has been extensively developed, redeveloped, infilled and the facilities upgraded and refurbished to the point where, apart from uncovered tennis courts and a small croquet lawn, and the famous "Henman Hill" which is an outdoor broadcasting area, there is little if any open space which has not been built over or "landscaped" with pathways and other hard landscaping features.	Noted.

40	Parkside Residents Association	09 Wimbledon	Wi3		Accordingly, a designation which anticipates further development to "upgrade and improve the AELTC's facilities" to keep pace with those available in other Grand Slam venues should recognise the distinct and separate characteristics of these two areas. It should not propose, as it does at present, what is in effect a "licence to build" on protected, hitherto undeveloped land such as the site on the eastern side of Church Road so that it can be changed, irreversibly, into an extension or replica of the AELTC's densely developed site to the west. Unity of ownership of two distinctly separate landholdings cannot override or justify development which conflicts with well-established protective planning policy.	Noted. We agree that AELTC's landholdings (at either side of Church Road and at Rayes Park) have very different characteristics; different planning policies apply to each and the site allocation does not propose to remove MOL, conservation area status or other aspects from the east of Church Road
40	Parkside Residents Association	09 Wimbledon	Wi3		Objections to some of the statements included in the text for Site Allocation Wi3 2.1 We note that in the "site description" for Wi3, it is stated (see Ch09 p283) that "The AELTC have commenced the preparation of an updated masterplan to investigate and identify the future development opportunities for the AELTC estate and the Championships incorporating the golf course." The content of this document is unknown as it is not in the public domain. In any event, any "masterplan" prepared by a private organisation is a commercial strategy to promote its own business development; it is not subject to public scrutiny or approval or to any commitment as to due performance of its objectives, and can be withdrawn, modified or even abandoned over time to suit the organisation's changing strategic priorities. It does not follow that the commercial opportunities which a masterplan identifies will be consistent with planning policy frameworks which are established in a public and democratic context. To reference the AELTC's undisclosed masterplan in this Local Plan implies an endorsement of its objectives, whatever they may be. This is inappropriate; the reference to the masterplan should be deleted.	Noted. No change proposed. It is a statement of fact. At the time of writing AELTC had commenced the preparation of an updated masterplan. Since then AELTC have publicly consulted on their masterplan in March, April and June 2021 (AELTC's website https://www.wimbledon.com/en_GB/about_wimbledon/estate_master_plan.html) as part of the pre-application engagement for planning application 21/P2900
40	Parkside Residents Association	09 Wimbledon	Wi3		2.2 In the previous Draft (Stage 2) of the Local Plan, the Site Allocations included a list of "Issues" and "Opportunities" applicable to each site, including Wi3. In the Final Draft (Stage 3) that approach has been changed in the text for all Site Allocations. "Issues" and "Opportunities" are replaced with notes headed "Design and Accessibility Guidance" and "Infrastructure Requirements". In the case of Wi3 one of the "Issues" cited in the Stage 2 draft was that: "The AELTC site is used in a highly intensive manner for less than a month per year, and relatively little given its size and scale outside the tennis grass court season. Any assessments relating to buildings or structures ... should take account of this unusual usage pattern". It is curious that this has been omitted from the final Stage 3 Draft which suggests instead "Outside the Championships period the site remains in use for member, club and charitable activities and includes the AELTC's Wimbledon Lawn Tennis Museum which attracts 100,000 visitors per year". The Museum, despite its visitor numbers, is only one relatively small building; the public has no access to other parts of the site. Given the scale of the area and the density of buildings and other permanent facilities provided for the Championships (a grass court event) on the site to the west of Church Road it is reasonable in our view to recognise their relatively limited usage pattern and to suggest that this be factored in to assessments of proposed future buildings.	Agreed. Recommend amendment to "Infrastructure requirements" of site Wi3 to add the following, derived from text used in Wi3 and consultation stage 2 and 2a The AELTC site to the west of Church Road is used in a highly intensive manner for less than a month per year, and relatively little given its size and scale outside the tennis grass court season. Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of this unusual usage pattern.
40	Parkside Residents Association	09 Wimbledon	Wi3		2.3 The "Site Location" summary (Ch.09 p284) the section "Impacts a Conservation Area" is incorrect as presently drawn. If the Site Allocation is to include the whole of the Golf Course land to the east of Church Road, the section should note that this land is within the Wimbledon North Conservation Area; currently the section merely suggests that the "the north end of the site is within the Bathgate Road Conservation Area" and that "the Wimbledon North Conservation Area lies to the west of the site".	Agreed - this wording needs to be changed to reflect the current Conservation Areas.
40	Parkside Residents Association	09 Wimbledon	Site Allocations cover sheet	276	3. Inconsistencies with other policies and definitions in the Local Plan 3.1 The Local Plan describes "Site Allocations" (see p276) as "planning policies which apply to key potential development sites of strategic importance...". How can a site which enjoys so many layers of protection from development as noted above be identified as a "key potential development site of strategic importance"?	Agreed - current text is not clear. Recommended amendments: Site allocations are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities. Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for site allocations will be determined against planning policies (including the London Plan). Identifying sites for a specific land use or type of development helps give certainty to what is likely to happen in that neighbourhood and helps provide homes, business space, town centre uses, infrastructure, community facilities, sports, parks and open spaces and other types of development to help meet the borough's and London's needs. These sites are contained in the development plan as site allocations.
40	Parkside Residents Association	09 Wimbledon	Wi3		3.2 Site Allocation Wi3 is one of 14 Site Allocations in the Plan. It is considerably larger in area than the others. As noted above the area to the west of Church Road is already densely developed (including with buildings erected in the last decade, others still under construction and there are also outstanding planning permissions yet to be implemented); the AELTC's land to the east of Church Road is undeveloped Grade II* Listed historic parkland designated as MOL. As such it contrasts starkly with all the other Allocation sites which are mostly brownfield sites in built up areas where redevelopment delivering strategic priorities such as housing, jobs and social infrastructure suitable for an urban or town centre location might be appropriate. Although South Wimbledon Station (Wi8) is a Grade II listed building, as is the former town hall which is part of Centre Court (Wi16) and in a Conservation Area, none of the other Allocation sites offer the significant historic "green" environmental and amenity value which the AELTC's MOL designated land to the east of Church Road provides nor do they enjoy the same level of planning policy protection against development.	Noted. Merton is largely a borough of fragmented land ownership and small sites. The AELTC sites on either side of Church Road is one of the largest single-landowner sites in the borough, aside from Wimbledon and Mitcham Commons and parks and open spaces in council ownership.
40	Parkside Residents Association	09 Wimbledon	N9.1(o) (q)		3.3 Policy N9.1 lists a number of commitments by Merton "to ensure that Wimbledon continues to be a thriving destination for businesses, residents and visitors." These include at para 9.1(o): "Conserving and enhancing the quality of neighbourhoods within the neighbourhoods through Conservation Area character protection, and by supporting incremental development that respects the character and heritage assets within the area;" and, at para 9.1q, a commitment to: "Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally." In our view these two commitments are contradictory – the unqualified support for development by the AELTC on its entire landholding as envisaged in para 9.1q fails to recognise the Conservation Area and Heritage Asset status of the Golf Course/parkland area to the east of Church Road and the protection, acknowledged in para 9.1o which that status affords. Para 9.1q must therefore be suitably qualified to acknowledge both the commitment in para 9.1o and the other planning policy protections applicable to the Golf Course/parkland area as noted above.	Officers have reviewed this policy and recommend the deletion of the word "incremental" from Policy N9.1o (now p... as this does not make this policy accurate or clear. Development in conservation areas does not need to be incremental, and the removal of this word helps to focus that development needs to respect the character and heritage assets within an area. Officers do not consider any changes are required for Policy N9.1(q)
40	Parkside Residents Association	09 Wimbledon		9.1.34	3.4. Para 9.1.34 notes the significant economic benefit and jobs boost provided by "the AELTC activities" around the Championships and, referencing the numbers of visitors to the Wimbledon Tennis Museum, throughout the year as well. However, these "activities" are acknowledged to take place on "the main site" ie the landholding to the west of Church Road where the Championships take place and the Museum is located. The commitment noted in Para 9.1.35 to "support the continued upgrade and improvement of all AELTC's facilities" must also be read in that context as there are no "facilities" capable of "upgrade or improvement" on the open space to the east of Church Road and cannot be a justification to include that open space in Site Allocation Wi3	Noted. No change proposed. AELTC are the long term freeholders of the golf course lands and facilities and so it is considered accurate to refer to the upgrade and improvement of AELTC's facilities.

41	Plan Wimbledon	01a Introduction		1.1.14	<p>The council's current draft says: Neighbourhood Plans 1.1.14. Neighbourhood Plans are plans prepared by the community which set out the detailed planning policies and proposals for their specific area. Policies and proposals within Neighbourhood Plans must be in general conformity with the local plan. 1.1.15. At the time of writing (July 2021) the council has just taken a decision on PlanWimbledon's proposal to form a neighbourhood forum for their proposed neighbourhood area of Wimbledon. More information can be found on Merton's website: Neighbourhood plans (merton.gov.uk)</p> <p>We repeat what we said in response to the previous draft. The local plan should clearly acknowledge the potential importance of neighbourhood planning. A neighbourhood plan that has been passed by an examiner and ratified by the community becomes part of the 'total multi-layered development plan'. It sits side by side with the local plan. The neighbourhood plan must conform to the local plan, but it can influence how development is undertaken within the designated area. The neighbourhood plan sets out policies that help to shape, design and guide development to meet a shared vision. It complements the local plan by providing additional detail. This might be, for example, on the quality of development expected for the area and a distinct neighbourhood approach to a strategy set out in the local plan, but without undermining it. The neighbourhood plan and the local plan each have a role to play and go hand in hand.</p> <p>The local plan should explain what practical action the council will take to support neighbourhood planning in the borough. The council should clearly acknowledge the neighbourhood planning process and commit to supporting groups working on neighbourhood plans, recognising that they are an important part of the overall development plan (indeed, more so than any SPD, as a neighbourhood plan carries more weight). The council could also commit to spending the neighbourhood portion of the Community Infrastructure Levy in the area in which the payable development took place, and it should confirm that spending this portion could be informed by projects and aspirations identified through the neighbourhood planning process.</p>	<p>Noted. No change proposed to the Local Plan. The council's website https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/neighbourhood-plans contains much of the information in this representation, including the explanation of neighbourhood planning, including links to government's good practice guide on neighbourhood planning. It states "Neighbourhood planning allows residents, employees and businesses to come together through a 'Neighbourhood Forum' and produce a neighbourhood development plan. Once adopted, the neighbourhood development plan can be used to guide decisions on planning applications within the neighbourhood area. Find out more by visiting the Government's Planning practice guidance on Neighbourhood Planning.</p> <p>Neighbourhood planning gives communities direct power to shape the development and growth of their local area. They are able to develop a neighbourhood plan which will support the grant of planning permission for the new buildings they want to see go ahead.</p> <p>A Neighbourhood Plan may address a wide range of social, economic and environmental issues. The number and form of the issues addressed are dependent on what the neighbourhood forum considers to be relevant to the neighbourhood. A neighbourhood plan sits alongside the Council's Local Plan for the area, which provides policies and guidance at both a borough-wide and a neighbourhood scale Your Neighbourhood Plan must be in line (known as "general conformity") with the strategic policies in the area."</p> <p>The information on Merton's website then goes on to explain the neighbourhood forum application process, the neighbourhood plan production process and how to contact the council for more information. Practical support measures for neighbourhood planning and consideration of how CIL is spent are very important matters but are themselves not planning policies and are not proposed to be contained in the Local Plan.</p>
41	Plan Wimbledon	01B Good Growth		9	In Chapter 01B, Good Growth, page 9, where the draft identifies stakeholders and partner organisations responsible for the successful implementation of the policies and delivering growth in Merton, it should be amended to reflect and aspiration to work with any neighbourhood forums.	<p>Agreed. Recommend the following amendment to Chapter 01b page 9</p> <p>Stakeholders and partner organisations Responsibility for the successful implementation of the policies and delivering growth in Merton falls not only upon the council in its role as Local Planning Authority but also upon our partners and other stakeholders, including neighbouring boroughs, the Greater London Authority (GLA) and other public and private sector organisations, especially on strategic matters. We will work with community groups and organisations across Merton's diverse communities (faith and ethnicity) including resident and business associations, neighbourhood forums, cultural organisations, disability groups, faith groups, children and young people and the veteran community at Haig Homes to deliver growth, as well as healthy and sustainable neighbourhoods.</p>
41	Plan Wimbledon	all			We will not repeat most of the comments that we made at the previous stage of the consultation. We called particularly for the local plan to be more specific about how development should achieve the council's planning goals, and to avoid vague generalities. We are disappointed that the new draft is still so weak in this regard. We will just repeat our call for the local plan to stress the potential of neighbourhood planning, and for it to explain how the council will encourage and facilitate it	Noted
42	Raynes Park and West Barnes Residents Association (RPWBRA)	02 Climate change			The RPWBRA fully supports LBM's objectives behind the Policies in this section. Decisive and prompt action need to be taken now to drive towards a net-zero carbon society and economy by 2050. We therefore make the following comments.	Officers have responded to the individual comments below.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	02 Climate change	CC2.4	section b iv	The increased use of heat pumps should not be at the expense of other design and environmental considerations. Proposals for the use of heat pumps should also include assessment of the architectural appearance and noise emissions. All such design implications should be properly considered and assessed, with a standard noise emission condition of "not to exceed LA90-10dB at the nearest residential boundary	Merton's small site guidance SPD provides design guidance on many design matters, including the location of external services. These SPD's have been signposted throughout the Design chapter of the Local Plan. No changes made.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	02 Climate change	CC.2.5	para 2.5.90	In keeping with the Climate Change Emergency, we urge that the Whole Life-Cycle Carbon Assessment should be set as a standard requirement for all new developments and refurbishments, apart from the very small. Bearing in mind the large number of relatively small new developments that are anticipated to comprise the majority of new builds and refurbishments in Merton, we consider that the threshold of either 30 dwellings or 1,000 sqm is far too high and should be reduced to a much lower level, otherwise this aspect of Policy CC2.5 may be largely ineffective. We note that the Economic Policy EC13.4 is set at 10 dwellings or 1,000 sqm and consider this to be a far more appropriate threshold. We recommend that the assessment of Embodied Carbon should also include proof of how it has informed and influenced the resulting design, selection of materials, construction method, consumed energy and generated waste	The London Plan requires all referable schemes to undertake a Whole-Lifecycle Carbon assessment. We are proposing to go beyond the London Plan and require this assessment for all schemes over 30 dwellings and 1,000sqm non-residential GIA, and all proposals to demolish and rebuild a single dwelling which, except in cases of structural instability, are generally seen as being contrary to the principles of sustainable development and a circular economy. However, at this stage we are not proposing to require this for smaller schemes (other than for proposals to demolish and rebuild a single dwelling), given that this is a relatively new requirement and that it may be considered overly burdensome for smaller schemes. We will review this threshold as part of the next Local Plan review, once the guidance and process is more established. Where a Whole Life-Cycle Carbon assessment is required, applicants will need to follow the GLA's Whole Life-Cycle Carbon Assessment guidance; the assessment will need to be proportionate to the scale of development for the build and demolish schemes mentioned above.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park	N6.1	para 6.1.8	This section, dealing with flooding risk, should also refer to the Flood Risk arising from the Pyl Brook and should include reference to Brook Close, Greenway, Linkway, West Barnes Lane, Westway and Westway Close.	References to Pyl Brook are made throughout the relevant Site Allocations. Officers do not consider additional changes need to be made.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park		para 6.1.7	In order ensure good quality dwellings with adequate internal space, we recommend that the conversion of single dwellings into multiple units should only be permitted for single dwellings in Council Tax band F or above. This would also protect the area from the gradual loss of existing medium-sized family homes.	All housing policies are contained within Chapter 11. No changes required to Chapter 6.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park		para 6.1.7	Also, because much of the Raynes Park area is already subject to car parking stress, where an existing single unit is converted into multiple units, the residents in such properties should not be eligible for parking permits, either in existing CPZs or where CPZs are subsequently introduced.	Agreed. This requirement is covered in Policy T16.4 b of the Sustainable Transport Policies for this which has been amended to clarify that occupants will not be eligible for parking permits. b. All new development in Controlled Parking Zones, including conversions to multiple dwellings will be permit free, with occupants being ineligible to apply for on-street parking permits.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park		para 6.1.7	For similar reasons, such dwellings should also provide secure bicycle storage areas and sufficient storage for food waste, household waste and re-cycling wheellie bins, boxes and other waste receptacles.	Policies D12.3.s, t, u and v provide specific policy for bins and bikes.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park	RP2		The Design Guidance should make reference to the proximity of the Sacred Heart Primary School and require developers to liaise with the school governors and ensure any concerns are addressed by the design.	This is already covered in Policy 12.1.e. No further changes required
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park	RP2		The Design Guidance should make reference to the proximity of the Sacred Heart Primary and Raynes Park High Schools and require developers to liaise with the school governors of each school and ensure any concerns are addressed by the design	This is already covered in Policy 12.1.e. No further changes required
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park	RP4		We note that the first sentence of the Site Description is incomplete, as it ends with the verb "demolish".	Agree. Description has been corrected.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park	RP6		We note that the Existing Uses reads "The consultee's submission states that ... there is no interest in the site being used solely as sports fields." The Raynes Park and West Barnes Residents' Association strongly refutes this assertion and to ensure proper balance in an official document of the London Borough of Merton, we urge that our opinion should be given equal weight in this description of the site	No further change proposed; this is simply stating that this is what the landowner's representation states.

42	Raynes Park and West Barnes Residents Association (RPWBRA)	06 Raynes Park	RP7		The Design Guidance states "Planning permission was granted in 2015 ... for the provision of a 'kiss and ride'. The scheme is now being phased and the business floorspace and kiss and ride have been implemented." This statement is incorrect. We draw attention to the fact that the construction of the kiss and ride is not complete, as the removal of the electricity substation to accommodate the mini-roundabout has yet to be done. Also the site is not maintained to an acceptable standard for its intended use by the public, as it is now used for private car parking and the pedestrian refuge at the entrance is damaged.	Minor wording change from "have been implemented" to "have commenced" for clarity and correctness.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	13 Economy and town centres	EC13.2	Para 13.2.16	We recognise that some businesses may need to operate HGV movements without the constraint of restrictions that would otherwise be necessary if they were located in residential areas. However, as part of Policy EC13.2, such business should be required to route their HGVs in compliance with existing restrictions, such as London Lorry Control Scheme. For example, this scheme bans HGVs over 18 tonnes from using Grand Drive, SW20, between 9 pm and 7 am on weekdays and 1 pm on Saturdays until the following Monday at 7 am. However these restrictions are regularly breached by HGVs accessing neighbouring industrial areas, such as Garth Road.	Noted. For information - Information on the enforcement of the London Lorry Control Scheme is found on the relevant website https://www.londoncouncils.gov.uk/services/london-lorry-control Chapter 16 Travel and urban mobility addresses HGVs in travel planning
42	Raynes Park and West Barnes Residents Association (RPWBRA)	13 Economy and town centres	EC13.4	Section c	With regard to the proportion of jobs created by construction, this policy should include the recognition that, with "Modern Methods of Construction", many of the jobs created during the construction phase may be located in off-site pre-fabrication facilities and in other local authorities.	Noted. Amendment not supported - many jobs take place outside the borough boundary. Modern Method of Construction will still support some jobs in Merton.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	13 Economy and town centres	EC13.4		We concur with the objectives of this Policy that endeavour to protect scattered employment sites from development that would otherwise result in the loss of employment opportunities.	Noted
42	Raynes Park and West Barnes Residents Association (RPWBRA)	13 Economy and town centres	TC.13.5		We are pleased to note that both Raynes Park and Motspur Park are classified as Local Town Centres and that this policy endeavours to encourage and preserve the importance of these centres in the local economy.	Noted
42	Raynes Park and West Barnes Residents Association (RPWBRA)	14 Infrastructure	IN14.1	Paras 4.1.15 & 14.1.16	Premises, property and businesses in the Raynes Park and West Barnes wards have repeatedly seen flash flooding in 2020 and 2021. Bearing in mind that most of the local drainage infrastructure was constructed in the 1930's, it now has insufficient capacity due to 90 years of: <input type="checkbox"/> Growth in population and density of development, <input type="checkbox"/> Increases in hard surfaces and loss of open spaces, <input type="checkbox"/> Increases in water usage per capita. <input type="checkbox"/> Increased precipitation, due to Climate Change. The frequency of these flooding events demonstrates that the existing surface water drainage infrastructure in Raynes Park and West Barnes is proving to be increasingly inadequate. Taking into account its financial and business pressures, we question the reliability of Thames Water to make unbiased assessments of its available spare capacity to cater for proposed developments. Therefore, developers should not be able to rely on Thames Water's own assessment of available capacity but should carry out their own assessment, to be undertaken by an independent consultant	Noted. Amendment not supported - requiring independent consultants to investigate Thames Water's assets is beyond the scope of a local planning authority.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	14 Infrastructure	IN14.2	4.2.12	We strongly recommend that sports and leisure facilities should be added to this list.	This is covered in the following: Policy IN14.1(f) states "We will work with partners to facilitate the delivery of sport, recreation and play facilities and to encourage the shared use of sites and spaces." Policy IN14.3 provides specific policy wording on Sport and Recreation. No changes required.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	15 Green and blue infrastructure	F15.7 F15.8 F15.9		The RPWBRA is located in an area which is subject to flooding. In particular, in 2020 and 2021 there have been several instances of flash flooding. We are concerned that, despite planning conditions recently imposed on developers to mitigate surface water flows from new developments, when it comes to the test, such measures are proving inadequate. Measures to mitigate surface water run-off need to be robust in design, future proofed and properly maintained in the long term. We fear that a simple maintenance plan submitted as a planning condition is insufficient to ensure their long term effectiveness, taking into account the increasing demands of ongoing climate change. We recommend that planning conditions should require owners to carry out independent annual inspections, assessment of continuing effectiveness and implementation of any recommendations for such flood and run-off remedial measures.	This submission raises issues that deal with the enforcement of planning conditions. This is not a consideration for the local plan. Officers consider that the flooding policies are robust and contain all necessary information required to ensure development does not contribute to further flooding. No changes recommended.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	15 Green and blue infrastructure	O15.1		The RPWBRA has important and crucial comments and recommendations concerning Section 15 and the supporting maps and appendices, as follows: 1. We note that within Strategic Policy O15.1, Merton aims to protect and enhance open spaces, green infrastructure and nature conservation and that the Borough will do this by protecting and enhancing open spaces in the borough, including Metropolitan Open Land, parks, other open spaces and areas of nature conservation provide high quality environments for all residents.	Noted
42	Raynes Park and West Barnes Residents Association (RPWBRA)	15 Green and blue infrastructure	O15.1		RPWBRA fully support these policies for protecting and enhancing open spaces in the borough, including Metropolitan Open Land (MOL), parks, other open spaces and areas of nature conservation. However, we are therefore extremely concerned that several component documents in the Draft Local Plan are not consistent with this policy. For example, we note the following	Support for policies is noted. Refer to detailed responses below.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	15 Green and blue infrastructure	O15.1	para 15.1.1	Justification 15.1.1 makes reference to Chapter 8, which does not exist	This reference is to Chapter 8 of the London Plan. Officers agree that this wording should be amended to make this clear.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	17 Appendices	MOL list	page 585	Section 17 Appendices, Page 585, which lists MOL areas, is extremely incomplete. There are numerous omissions from this list when compared to the Green Infrastructure map (Map 2), which is far more detailed. The text describing proposed changes to MOL for some areas is confusing, as it unnecessarily raises questions of the continuing status of adjoining area	Officers have reviewed the maps and the tables in the Appendices for MOL. There are 9 identified MOL sites in Merton and these are all shown on the maps and are listed in the Appendices. MOL often covers large areas of land and can include multiple parks in one identified parcel of MOL. No changes required.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	17 Appendices	MOL list	page 585-602	With regard to the Raynes Park Area, we observe the following omissions from the MOL list on page 585. In Motspur Park area: <input type="checkbox"/> Sir Joseph Hood Memorial Playing Fields, <input type="checkbox"/> Old Blues Rugby Football Ground, <input type="checkbox"/> KCS Sports Ground, <input type="checkbox"/> Merton and Sutton Cemetery <input type="checkbox"/> Morden Cemetery, <input type="checkbox"/> and other contiguous areas, including Derwent Floodwash, land west of Meadowsweet Close and old nurseries at the end of Arthur Road . Bushey Mead area: <input type="checkbox"/> Cannon Hill Common, <input type="checkbox"/> Prince George's Playing Fields, <input type="checkbox"/> Raynes Park Vale FC, <input type="checkbox"/> Joseph Hood Recreation Ground, <input type="checkbox"/> Messines Playing Fields, <input type="checkbox"/> and other contiguous areas, including Martin Way Allotments. . Coombe Lane area: <input type="checkbox"/> Raynes Park Recreation Ground <input type="checkbox"/> Old Wimbledonians and Donhead Sports Ground, <input type="checkbox"/> and other contiguous areas. Grand Drive: <input type="checkbox"/> AELTC Community Sports Ground and other contiguous areas, including the land at the rear of 274-312 Cannon Hill Lane	Officers have reviewed the maps and the Appendix for MOL. There are 9 identified MOL in Merton and these are all shown on the maps and are listed in the Appendices. No changes are required. MOL often covers large areas of land and can include multiple parks in one identified parcel of MOL. In Motspur Park area: <input type="checkbox"/> Sir Joseph Hood Memorial Playing Fields, (Lower Morden MOL) <input type="checkbox"/> Old Blues Rugby Football Ground, (Lower Morden MOL) <input type="checkbox"/> KCS Sports Ground, (Lower Morden MOL) <input type="checkbox"/> Merton and Sutton Cemetery (Lower Morden MOL) <input type="checkbox"/> Morden Cemetery, (Lower Morden MOL) <input type="checkbox"/> and other contiguous areas, including Derwent Floodwash, land west of Meadowsweet Close and old nurseries at the end of Arthur Road (Lower Morden MOL). Bushey Mead area: <input type="checkbox"/> Cannon Hill Common, (Cannon Hill MOL) <input type="checkbox"/> Prince George's Playing Fields, (Cannon Hill MOL) <input type="checkbox"/> Raynes Park Vale FC, (Cannon Hill MOL) <input type="checkbox"/> Joseph Hood Recreation Ground, (Cannon Hill MOL) <input type="checkbox"/> Messines Playing Fields, (Cannon Hill MOL) <input type="checkbox"/> and other contiguous areas, including Martin Way Allotments. (Cannon Hill MOL) Coombe Lane area: <input type="checkbox"/> Raynes Park Recreation Ground (Beverley Brook A3 MOL) <input type="checkbox"/> Old Wimbledonians and Donhead Sports Ground, (Beverley Brook A3 MOL) <input type="checkbox"/> and other contiguous areas.(Beverley Brook A3 MOL) Grand Drive: <input type="checkbox"/> AELTC Community Sports Ground (not MOL)
42	Raynes Park and West Barnes Residents Association (RPWBRA)	17 Appendices	MOL list	page 585-602	The above is not an exhaustive list and does not cover the whole borough. However, for the avoidance of doubt, we urge that the MOL schedule and subsequent schedules on pages 585 – 602 should be far more detailed and explicit. Otherwise, there is a high risk that the MOL status of these and many other areas may be called into question and the objective in the London Plan to give MOL the strongest protection could be undermined	Officers have reviewed the Appendices and Policy Maps and have made some corrections to the tables on pages 585-602 of the Appendices to ensure that all of the Site Names and Sub-Areas are correct and align with the Policies Maps. There were no errors in the MOL table.

42	Raynes Park and West Barnes Residents Association (RPWBRA)	17 Appendices	MOL list	page 585-602	<p>With regard to the loss of MOL Status for particular areas, we note that there are proposals to remove the MOL status for parts of the AELTCC site in Church Road, SW19, (ref: Site 3: All England Lawn Tennis & Croquet Club (AELTCC), Wimbledon). We observe that sections 3.11 and 3.12, make reference to Wimbledon Park Golf Course and therefore raise uncertainty over its continued MOL status. However, we also note that Map 2 LR, Green Infrastructure Policies shows that the Golf Club retains its MOL status.</p> <p>We are aware of approaches made by interested parties to remove MOL status from part of Wimbledon Park Golf Club. We are therefore extremely concerned that the London Borough of Merton will be swayed by landowners of MOL to remove the designation, in order to increase land values and enable exploitative developments.</p> <p>We therefore urge that this matter needs to be explicit in stating that Wimbledon Park Golf Course will retain its MOL status, irrespective of whether it is used as a golf course or not.</p>	<p>No changes are proposed to the MOL on the golf course site. The Local Plan continues the designation of Wimbledon Park Golf Course as MOL, as shown on the Policy Maps.</p> <p>No action required.</p>
42	Raynes Park and West Barnes Residents Association (RPWBRA)	N/A			<p>Introduction</p> <p>The Raynes Park and West Barnes Residents' Association (RPWBRA) has a membership of 1800 households in the Raynes Park and West Barnes wards. Our association was founded in 1928 and has served its local community on a continuous basis ever since.</p> <p>One of the principal reasons for its formation in 1928 is that part of the area was subject to flooding, a situation that, unfortunately, continues to this day. Therefore, the RPWBRA considers that the following urban planning objectives are crucial for our area and we expect Merton's Local Plan to robustly promote and defend the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Preservation of green spaces, <input type="checkbox"/> Use of sustainable urban drainage, <input type="checkbox"/> Proper maintenance of existing drainage, water courses and infrastructure, <input type="checkbox"/> Preventing the loss of porous ground surfaces caused by all forms of development, across the complete spectrum, from minor private works to major developments. <input type="checkbox"/> Control of storm water run-off, <input type="checkbox"/> Protection of the natural environment, <input type="checkbox"/> Encouraging the planting of trees and vegetation, <input type="checkbox"/> The drive to Net-Zero Carbon. <p>Therefore, with these and other concerns in mind, we make the following observations on Merton's Draft Local (Issued July 2021).</p>	Noted.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	N/A			The same principle applies to all existing areas of MOL and we urge the London Borough of Merton to resist all such lobbying and be robust and forceful in its protection of all existing Metropolitan Open Land.	Noted.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Policies Map		The indistinct colour rendering and hatching of the Green Infrastructure map (Map 2) and detailed area maps (e.g. Open Space and MOL Map (Raynes Park and Morden) and Open Space and MOL Map (Wimbledon) may be a cause for confusion	Officers will review the colours and other features of the Policy Maps and amend where these can assist with clarity.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Green Corridors	Map 3	<p>Green Infrastructure Policies Map 3 – Green Corridors</p> <p>This map should include the following Green Corridors:</p> <p>Bushey Mead Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Prince George's Playing Fields, <input type="checkbox"/> Raynes Park Vale FC, <input type="checkbox"/> Messines Playing Fields, <input type="checkbox"/> Cannon Hill Common <input type="checkbox"/> and other contiguous areas, including Martin Way Allotments. . <p>Cannon Hill Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Cannon Hill Common, <input type="checkbox"/> Joseph Hood Recreation Ground, <p>Grand Drive Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> AELTC Community Sports Ground <input type="checkbox"/> Former LESSA Playing Field (off Meadowview Road) <p>Raynes Park Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Raynes Park Recreation Ground (off Taunton Avenue) 	<p>Officers have reviewed the maps and comments are made below for each of the sites listed in the submission:</p> <p>This map should include the following Green Corridors:</p> <p>Bushey Mead Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Prince George's Playing Fields, (This site has been reviewed and is not considered to meet the Green Corridor criteria) <input type="checkbox"/> Raynes Park Vale FC, (This site has been reviewed and is not considered to meet the Green Corridor criteria) <input type="checkbox"/> Messines Playing Fields, (This site has been reviewed and is not considered to meet the Green Corridor criteria) <input type="checkbox"/> Cannon Hill Common (This site has been reviewed and is not considered to meet the Green Corridor criteria) <input type="checkbox"/> and other contiguous areas, including Martin Way Allotments. (This site has been reviewed and is not considered to meet the Green Corridor criteria) <p>Cannon Hill Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Cannon Hill Common (This site has been reviewed and is not considered to meet the Green Corridor criteria) <input type="checkbox"/> Joseph Hood Recreation Ground, (This site has been reviewed and is not considered to meet the Green Corridor criteria) <p>Grand Drive Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> AELTC Community Sports Ground (This site has been reviewed and is not considered to meet the Green Corridor criteria) <input type="checkbox"/> Former LESSA Playing Field (off Meadowview Road) (This site has been reviewed and is not considered to meet the Green Corridor criteria) <p>Raynes Park Area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Raynes Park Recreation Ground (off Taunton Avenue) (This is part of GC16 in the Policies Map)
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	<p>Policy O15.1 (p504 ff)</p> <p>We are concerned that the land behind 274-312 Cannon Hill Lane houses bordering the AELTC's Raynes Park Playing Fields (P002) is no longer listed as having Open Space Status as it used to, according to the lists in https://www.merton.gov.uk/Documents/17%20Appendices%20Merton%20Local%20Plan%20Reg19%20July21.pdf</p> <p>This change can also be seen on the map (https://www.merton.gov.uk/assets/Documents/Raynes%20Park%20Maps_FINAL_.pdf):</p> <p>[map inserted - see original response]</p>	Noted. The Policy Maps and Appendix show this land has been proposed for removal from Open Space through this Local Plan process.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	The Environment Partnership recommended the removal of the site's Open Space designation: age 16/41 shows more clearly that The Environment Partnership suggests the removal of Open Space Designation (TEP34): [map inserted - see original response]	Noted and agreed - the Green Infrastructure Study 2020 includes details on this site.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	<p>The TEP report states:</p> <p>Site 34: 274-312 Cannon Hill Lane, Raynes Park Open Space (P002)</p> <p>3.170 This site is located at the rear of six residential properties along Cannon Hill Lane. It is privately owned and is accessible only via a shared and gated driveway in between 320 and 322 Cannon Hill Lane. The All England Community Sports Ground lies directly adjacent to the north and the land to the west is currently unused (formerly a Scout Hall). The site is approximately 0.2 hectares in size and contains overgrown vegetation and some larger trees.</p> <p>3.171 The site does not form part of the adjacent site known as Raynes Park Playing Fields, however it has been given the same designation. Given that it is landlocked, the site does not offer any public accessibility or visual amenity and is not designated as a Green Corridor or SINC.</p> <p>3.172 It is recommended that the Open Space designation be removed for this parcel of land as it does not meet the Open Space criteria.</p>	Noted - this is an extract from the Green Infrastructure Study 2020.

42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	<p>However, in the Merton Core Planning Strategy 2011-26, Policy 13, states</p> <p>"21.4 People use open space for exercise, play, socialising and relaxing. Visual accessibility is equally as important as physical access."</p> <p>This is restated in the New Local Plan (p507) 15.2.1 . <i>Open space can be multi-functional; people use green and open spaces for many purposes including exercise, play, food growing, socialising and leisure. Visual accessibility is equally as important as physical access. The protection and enhancement of open spaces enables the provision of areas for active and passive leisure activities, has a positive impact on health and wellbeing, provides opportunities for social cohesion ... N</i></p> <p>Although residents cannot go onto the land, it is "visually accessible" and provides a "positive impact on communities' mental and physical health" for all of us</p>	Noted - these are extracts from the current and emerging policies.
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	<p>At least 27 species of bird regularly frequent the land; pipistrelle bats forage over the trees and other mammals are also present. This land provides an important ecological route from the Pyl Brook/ St Catherine's Field towards Cannon Hill Common. As the AELTC Community Sports Field becomes increasingly developed with domes over tennis courts, its value as a bat foraging area is likely to decrease, so it is becoming ever more important to protect the strip of woodland behind the Cannon Hill Lane houses.</p>	<p>Noted. This site is not identified as part of a SINC or Green Corridor and neither is any of the neighbouring or adjoining land.</p> <p>Ecological assessments carried out as part of the approved planning application 18/P1024 for the neighbouring AELTC site identified dense ivy along the boundary of the site which may be of importance to nesting birds. The AELTC site is providing a number of ecological enhancements including bird and bat boxes which will assist in enhancing the value of the AELTC site for wildlife.</p>
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	<p>The RPWBRA strongly objects to this change. The many residents of properties backing onto this strip of woodland who have contacted the RPWBRA all wish the land to remain as Open Space. The RPWBRA understands that residents have not been notified or consulted about the potential change of status. A decision to change the land's Open Space status without consulting neighbours lacks transparency and is undemocratic.</p>	<p>The preparation for the new Local Plan began in 2017 and a number of borough wide consultation rounds have taken place since.</p> <p>The Green Infrastructure Study 2020 was published on the Council's Local Plan Research webpage in August 2020 and has informed the preparation of the green infrastructure policies and maps for the new Local Plan.</p> <p>Both the Stage 2a consultation undertaken between November 2020 and February 2021 and the Stage 3 consultation undertaken between July and September 2021 included the proposed changes to the Policies Maps, including this site. Consultation methods for the local plan included emails to all people who have signed up to the Local Plan consultation database, publication in the My Merton magazine, which is delivered to every household in the borough and emailed to those who have requested email updates, and various social media updates including via the Council's Twitter and Facebook pages.</p> <p>Officers consider that the consultation process for the new Local Plan has been wide ranging and has used a variety of methods to notify as many residents and other interested parties as possible</p>
42	Raynes Park and West Barnes Residents Association (RPWBRA)	Policies Map	Open space	Canon Hill Lane 274-312	<p>"The Association believes that removing this land's Open Space designation is contrary to Policy N6.1 (page 220): m. Requiring development to respect local character, heritage and amenity in surrounding residential neighbourhoods. and its justification (page 224) 6.1.13. The suburban neighbourhoods within the neighbourhoods will be conserved and enhanced by ensuring that new development respects local character and amenity, and where appropriate historic value. (https://www.merton.gov.uk/Documents/06%20Raynes%20Park%20Merton%20Local%20Plan%20Reg19%20July21.pdf) Loss of Open Space status could allow development on this woodland site which would not "respect the local character, heritage and amenity" for neighbours. We urge you to keep this land's Open Space designation.</p>	<p>Policy N6.1 would be applied to development that comes forward through planning applications. This policy is not applicable when making assessments of open space policy map designations.</p> <p>Any changes to the open space designations on the Policies Map, including this site, have been informed by a review of the open space criteria set out in the Green Infrastructure Study 2020. Officers do not recommend any further changes for this site.</p>
43	Romulus	09 Wimbledon	Wi16		<p>Firstly I should emphasise that Romulus support the allocation and these comments are suggested drafting changes which are also consistent with the emerging changes to the centre being considered as part of its re-positioning and partial redevelopment.</p> <p>Existing uses</p> <p>The offices in the centre are ancillary at the moment including centre management.</p>	<p>Agreed minor amendment Existing uses: a mixture of town centre uses – retail, restaurants, financial and professional services and ancillary offices.</p>
43	Romulus	09 Wimbledon	Wi16		<p>Site allocation</p> <p>We would like to suggest the following amended wording: <i>A mixture of town centre uses such as community, retail, restaurants and take aways, leisure, financial and professional services, health and wellbeing, offices, hotel and residential and last mile distribution as well as ancillary facilities</i></p>	<p>Agreed MM Site allocation: A mixture of town centre types uses such as community (including health and wellbeing /day-centre), retail, restaurants and cafes take-away, financial and professional services, leisure, offices, hotel, residential and last mile distribution</p>
43	Romulus	09 Wimbledon	Wi16		<p>Site deliverability - 0-5 years repurposing existing site; 5-10 year</p>	<p>Additional modification to reflect that phase 1 will be delivered 0-5 years and phase 2 5-10 year</p>
43	Romulus	09 Wimbledon	Wi16		<p>Design and accessibility guidance</p> <p>The site provides an outstanding opportunity for <i>the repurposing</i> and redevelopment of...</p>	<p>Agreed minor mod Design and accessibility guidance: The site provides an excellent opportunity for <i>the repurposing and</i> redevelopment of a substantial brownfield site within the heart of the town centre</p>
43	Romulus	09 Wimbledon	Wi16		<p>... They must also look to work with the Council to explore the potential of a road bridge...'</p> <p>Since the SPD was produced and during the preparation of the Local Plan Romulus has bought the centre. Its plans are based on an occupier-driven re-purposing and partial redevelopment of Centre Court. The end of the centre where Merton is suggested a road bridge might potentially land is where the existing Debenhams building is being re-purposed and where the servicing and entrance/egress to the car park is located. This is unlikely to change during the plan period and is essential to the operation of the centre. Therefore Romulus asks that the sentence above should appropriately be removed as its intent would be to unfortunately prejudice the regeneration of the centre.. Furthermore, Romulus cannot facilitate a road bridge. That could only be delivered with the full support of Network Rail and TfL and would require CPO including land on the opposite side the railway on Alexandra Road. Romulus suggests that this is an appropriate time for Merton to review the idea of the bridge and establish whether it is a deliverable project and whether its benefits would outweigh the potential negative impacts especially in relation to the future success of a reimagined Centre Court.</p>	<p>Additional modification proposed to remove reference to provision of a road bridge as not justified</p>
43	Romulus	09 Wimbledon	Wi16		<p>Infrastructure requirements</p> <p>Romulus support the wording relating to enhancing and expanding the public realm on Queens Road.. This is consistent with its own plans for improving Queens Road both in the short and longer terms with new landscaped Public Realm, traffic calming and with priority given to pedestrians and cyclists over buses and vehicle traffic. This will require a consistent approach between what can be delivered within Romulus's ownership and what could take place on highways land. Romulus very much supports the opportunities for last mile distribution. We suggest that it should be listed in the appropriate uses in the site allocation. As outlined above.</p>	Noted
43	Romulus	14 Infrastructure	IN14.3		<p>There should be an explanation that on-site provision of play space only arises if the child yield dictates that it is required. Centre Court in its new role as a hub for and meeting place in Wimbledon town centre will already be providing a far greater variety of facilities for residents and users of the town centre but there is only a limited amount of space to accommodate those facilities. Therefore Romulus asks that play space should not be a requirement per se – only arising from the mix of uses.</p>	<p>Policy IN14.3(d) sets out that the council will "require all major residential development likely to be used by children and young people to provide on-site, good quality, free to use, safe and accessible play spaces for all ages. The amount of play space provided is to be proportionate to the anticipated increase in child population as a result of the proposed development."</p> <p>Further information is provided in the supporting text, referring to the London Plan and Mayor's SPG requirements. No changes are recommended.</p>

44	Southwark, London Borough of	02 Climate Change	CC2.1		We support the overarching principles of this strategic policy towards achieving Merton Council's carbon reduction targets in line with your Climate Strategy and Action Plan, published in November last year. We support the approach set out in paragraphs 2.1.8-12 of the justification text, which requires all new development to be fit for the future in terms of energy efficiency, climate resilience, and low carbon and renewable energy. This aims to reduce the need for future retrofitting of buildings over the next 30 years. We recognise the important role of policy in delivering new development that will operate as net-zero carbon and achieve a zero-carbon built environment in the UK by 2050. We welcome the insight provided in paragraphs 2.1.13-17 in relation to the policy gap between predicted and actual performance required to achieve net-carbon zero development. Paragraph 2.1.18 identifies key shortcomings in the London Plan policy requirement for net carbon zero, such as the reliance on cash-in-lieu contributions, which shift responsibility onto the local authority as well as the application of policy to major schemes only, which represents only 10% of schemes in Merton. We support the commitment to go beyond the London Plan requirements and push for on-site savings to be maximised through energy efficiency and low carbon / renewable energy generation. We also support the policy emphasis on minimising embodied carbon through a circular economy, and adapting to climate change impacts through sustainable design. These commitments will be achieved through the local policies set out below	Noted
44	Southwark, London Borough of	02 Climate Change	CC2.2		We support the adoption of the Mayor of London's Energy Hierarchy (Be Lean, Be Clean, Be Green and Be Seen) for all development. We support the requirement for all development creating one or more dwelling or 500sq.m or more non-residential GIA, to provide an energy statement on how emission savings have been maximised for each stage of the hierarchy in order to achieve net-carbon zero targets. In particular, we note and support the application of this policy to residential development including the change of use (CoU) and conversion of existing buildings that would create a new dwelling. This will facilitate retrofitting options for a large number of minor and conversion schemes, which cumulatively have an impact on achieving the net carbon zero by 2050. Paragraph 2.2.6 of the policy justification text clarifies that in order to incentivise retrofitting, the CoU and conversions of existing buildings will not be required to offset any shortfall in carbon reduction targets. In doing so, this aims to minimise embodied carbon emissions. We note your commitment to driving on-site carbon reduction by increasing the minimum on-site improvement against Building Regulations 2013 to 60% for major developments and minor development creating one or more dwelling, 50% for all non-residential development creating 500sq.m or more GIA, and 35% for all minor CoU and conversions creating one or more dwelling. We recognise that it is not always possible to achieve net carbon zero on site and therefore, off-site provision is required to offset any shortfall in carbon reduction. We therefore, welcome your research into carbon pricing which has identified that in order to deliver equivalent carbon savings offsite, the carbon offset price per tonne needs to be higher than the current price of £95/tonne required by the London Plan. On this basis, we support your proposal for a carbon-offset price of £300/tonne. This higher price aims to encourage developers to opt for a higher on-site delivery in the first place, whilst also providing Merton council with sufficient funds to deliver carbon saving equivalents off-site. At Southwark, we are preparing our own evidence base in light of this, to justify a higher carbon tariff for these same reasons. We support and encourage the requirement for developers to demonstrate why onsite targets are not met through a viability assessment as set out in paragraph 2.2.21 of the policy justification text	Noted
44	Southwark, London Borough of	02 Climate Change	CC2.3		We note the importance of this policy in delivering energy efficient development through design and fabric efficiency, as a key element of reducing on-site carbon emissions. We support the trigger point for all development of one or more dwelling or 500sq.m or more non-residential GIA to demonstrate how energy demand specifically has been minimised. This includes providing information on Energy Use Intensity (EUI) targets, which development will be required to meet from 2025. We welcome the research undertaken by LETI's Climate Emergency Design Guide, which recommends the use of EUI targets for driving energy efficiency. It is noted in paragraph 2.3.22 that Merton intend to enforce minimum EUI targets by 2025 and will be seeking to publish further guidance closer to this time, to confirm these targets. We would seek to continue engaging with Merton as this process develops, either through national regulations or as a locally derived methodology. We note that in terms of fabric efficiency targets, the policy required compliance with the minimum Fabric Energy Efficiency Standard (FEES) for Zero Carbon Homes. This is justified in paragraphs 2.3.10-13, which provides evidence to suggest that FEES is a more effective method at recognising energy efficiency than a percentage improvement against Building Regulations. As set out in paragraph 2.3.23, we support Merton's approach to encourage developments that adopt a recognised and successful fabric first approach, such as through the Passivhaus, which is recognised as the most stringent low energy in use standard and consistent with LETI's Climate Emergency Design Guide. We support the requirement for all major development to monitor and report on energy use for 5 years post occupation, in line with the GLA's Be Seen Energy Monitoring Guidance (or any future equivalent).	Noted
44	Southwark, London Borough of	02 Climate Change	CC2.4		We support the requirement for all development to make the fullest contribution to clean, efficient energy supply, and maximise opportunity for renewable and low carbon energy generation, storage and use. The policy provides clear guidance on what is required to demonstrate how low carbon energy has been incorporated into development; considering options for rooftop renewable energy, green roofs, smart metre installation, and decentralised energy. We note that part b(v) of the policy requires all major development located within an identified heat network opportunity area to utilise decentralised or be able to connect to current / future networks. We understand that this relates to Merton's own identified heat network opportunity areas which are linked to two major regeneration schemes in Morden town centre and South Wimbledon, and is subject to technical and financial viability. We support the requirement in paragraph 2.4.15 for all major developments to comply with the London Plan policies on decentralised energy. We also support the requirement in paragraph 2.4.17 for proposals seeking to develop / connect to district heat networks, to do so in compliance with Merton's climate change policies and ensuring development is future proofed and that heat losses have been minimised. We support the policy requirement for no gas boilers in new residential and nonresidential development from 2030. This is supported by the Clean Growth Strategy 'UK Housing: Fit for the Future?' report in 2019, which concluded that new homes should not be connected to the gas grid from 2025 at the latest, in order to avoid retrofitting expense. We note in paragraph 2.4.3 that gas is the primary source of heating for homes in Merton and that, in order to achieve the net carbon zero target by 2050 and minimise the burden of retro-fitting for the council, Merton needs to be gas free. We support the requirement in paragraph 2.4.7 for any development proposing the use of gas-powered systems to provide a robust justification to demonstrate that low or zero carbon systems are not achievable, provide evidence for how the development is future proofed to meet net carbon zero by 2050, and that the use of gas-powered systems is a credible stepping stone towards meeting this target. We understand that this will not apply from January 2023 onwards, when gas boilers will no longer be able to be installed in new development.	Noted
44	Southwark, London Borough of	02 Climate Change	CC2.5		We support the principle of this policy to minimise waste and embodied carbon. We recognise the importance of encouraging all development to prioritise 're-use' and 'retrofit' over 'new building' as well as consider the design of development and choice of materials to minimise embodied carbon and limit the need for repair and replacement over the lifetime of the development. We note that this policy requires all development creating 30 or more dwellings, 1000sq.m of non-residential GIA, and all development proposing to demolish and rebuild a single dwelling, to undertake a Whole Life-Cycle Carbon assessment. This goes beyond the London Plan requirement for major referable and aligns with the London Plan's aspirations to encourage local authorities to set their own local thresholds. It is noted in paragraph 2.5.10 that the justification for including demolition and reconstruction of a single dwelling house is linked to the large number of applications received by the council for this type of development. We support the council's approach to identifying this issue and the subsequent requirement for Whole Lifecycle Carbon Assessments, which are proportionate to this type of development, in order to demonstrate compliance with the principles of a circular economy and minimising embodied carbon. This is likely to have a positive outcome for minimising waste and carbon emissions from cumulative small-scale development, which would otherwise not been required to identify and address these issues	Noted
44	Southwark, London Borough of	02 Climate Change	CC2.6		We support the approach to this policy in driving sustainability standards through development of new and existing buildings, including through the effective use of materials and resources, minimising water use, and contributing to carbon reduction targets. We support the requirement for all residential development to achieve Building Regulation Part G water efficiency standards (or equivalent), and for all conversions and CoU to existing buildings creating 10 or more new dwellings, to achieve the minimum BREEAM rating of 'Excellent.' We note that there is not a BREEAM requirement as part of this policy, for new residential development. We understand this is due to the policy requirement set out in Policy CC2.3 to adopt a fabric first approach, in accordance with the minimum Fabric Energy Efficiency Standard (FEES) for Zero Carbon Homes. This is justified by your evidence base in paragraphs 2.3.10-13, as a more effective method for recognising energy efficiency. We support the requirement for all new build, conversion and CoU for non-residential development creating 1,000 sq.m GIA and above, to achieve a minimum BREEAM rating of 'Excellent' (or equivalent). The requirement for conversions and CoU proposals to meet these design standards will contribute to making the existing building stock fit-for-purpose and resilient to climate change and therefore, is supported.	Noted
44	Southwark, London Borough of	12 Places and spaces in a growing borough	D12.5		We note that climate change impacts have been incorporated into design policy throughout this chapter. This demonstrates the importance of taking into account climate change impacts and delivering solutions to mitigate and adapt to these impacts, though sustainable design and construction. We support the council's recognition that sustainable design principles play a critical role in delivering net-zero carbon and climate resilient development. In relation to opportunities for retrofitting existing building stock, we support part g of Policy D12.5 Managing Heritage assets, which requires proposals to existing heritage assets to improve energy efficiency in an effective and sensitive way without affecting the heritage asset and its setting. This is a good example of how design policy might work together with climate change commitments to deliver sensitively designed energy efficiency measures for London's heritage building stock.	Noted

44	Southwark, London Borough of	15 Green and blue infrastructure			We note that climate change contributions have been recognised and incorporated throughout this chapter as a positive outcome of biodiversity enhancement, urban greening, protection of trees, sustainable flood management and pollution control. We support this approach to embed climate change as a key theme throughout the chapter, demonstrating the significant link between the protection and enhancement of our natural environment, and mitigation and adaption measures for tackling climate change. Overall Southwark Council is supportive of Merton's approach to tackling climate change and energy performance in the Merton Local Plan. Southwark Council would like to continue to be involved in and discuss Climate Change policy with Merton.	Noted
45	Sport England	04 Mitcham	Mi14		[stage 2a comments] I note that Merton Playing Pitch Strategy states that this site should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough. Sport England has worked with the Local Authority and the relevant national governing bodies for sport in order to determine how it can be brought back into use for sport and feasibility studies/surveys to this effect are in the process of being reviewed by Sport England and the NGBs. It is Sport England's strong preference that this site is retained for sport. Unless Sport England and the national governing bodies agree that it is not possible to preserve the site for sport following a review of the feasibility study, Sport England objects to residential development on this site.	Noted. As per our meeting on 5th October 2021, we have contacted the Hillcroft Lacrosse Club (responders to Stage 2a consultation, response available online at https://www.merton.gov.uk/Documents/Hillcroft%20Lacrosse%20Club%20Stage%202a.pdf) to confirm their continued interest in using this site for sport and the terms under which they would be able to access the site. We have also contacted the ECB again regarding cricket clubs that may be capable of delivering this site. We understand there haven't been further discussions on site feasibility with the applicant and yourselves in a few months. The applicant provided the following information to demonstrate that the site has already been let for community sports uses in the past which was unviable; this was shared with previous colleagues at Sport England (stage 1 (site submission) - 2017 https://www.merton.gov.uk/assets/Documents/United%20Westminster%20Schools%20response%20to%20Merton%20Jan18.pdf (stage 2 2018 previous community sports use records on site https://www.merton.gov.uk/assets/Documents/United%20Westminster%20Schools%20Local%20Plan%202018%20sta%202%20Combined.pdf)
45	Sport England	04 Mitcham	Mi14		[stage 3 representations] In particular, in the case of Tamworth Lane (site Mi14), I have put the owners agents in touch with sports clubs who are potentially interested in using the entire site. Sport England will object to the use of this site for housing as it has not yet been established whether sports clubs might be able to make use of the full site.	Noted. As per our meeting on 5th October 2021, we have contacted the Hillcroft Lacrosse Club (responders to Stage 2a consultation, response available online at https://www.merton.gov.uk/Documents/Hillcroft%20Lacrosse%20Club%20Stage%202a.pdf) to confirm their continued interest in using this site for sport and the terms under which they would be able to access the site. We have also contacted the ECB again regarding cricket clubs that may be capable of delivering this site. We understand there haven't been further discussions on site feasibility with the applicant and yourselves in a few months. The applicant provided the following information to demonstrate that the site has already been let for community sports uses in the past which was unviable; this was shared with previous colleagues at Sport England (stage 1 (site submission) - 2017 https://www.merton.gov.uk/assets/Documents/United%20Westminster%20Schools%20response%20to%20Merton%20Jan18.pdf (stage 2 2018 previous community sports use records on site https://www.merton.gov.uk/assets/Documents/United%20Westminster%20Schools%20Local%20Plan%202018%20sta%202%20Combined.pdf)
45	Sport England	04 Mitcham	Mi12		[stage 2a comments] Sport England would reiterate its previous comments. It is not clear from the proposals what the relationship is (if any) between this site and the playing field opposite which accommodates a cricket field. If this site contains any ancillary facilities that support the playing field such as car parking, Sport England would object to their loss. If the future of the maintenance of the playing field is associated with this site, the Council should consider how this will be addressed, should this NHS site be converted to residential development.	No modification proposed. The Birches Close site does not contain any ancillary facilities in relation to the operation or maintenance of the Cricket Green cricket pitch.
45	Sport England	04 Mitcham	Mi3		[stage 2a comments] To reiterate previous comments, Sport England welcomes the opportunity to maintain the cricket pavillion on this site. It should be made clear which part of the site will be redeveloped. Also if the car parking on this site serves the cricket ground it may be important to retain some parking to serve the cricket ground. The allocation should make clear and draw from the findings of the playing pitch strategy to help identify which part of the site will be retained for sport	Agreed - action to amend the site allocation boundary to make it clear where the cricket pavillion and storage shed are and where the Burn Bullock is. While there is no on-site parking specifically required for cricket, there is a storage shed as well as the cricket pavillion and both should be illustrated in the allocation.
45	Sport England	05 Morden	Mo3		[stage 2a comments] I note that the policy acknowledges that it is important that any residential development here is designed to minimise the impact of the adjacent sports facilities, as set out in a previous email from Sport England (see below). It is essential that this is the case in order to avoid prejudicing the existing playing fields. I also note that the Merton Playing Pitch strategy states that a Section 106 financial contribution will need to be agreed as part of any future development on this site, to ensure investment into the sporting facilities on the wider site.	Noted. In 2020 Merton Council's Planning Applications Committee resolved to grant planning permission for residential development on part of this site, subject to a Section 106 agreement to ensure investment in the sporting facilities on this site.
45	Sport England	06 Raynes Park	RP6		[stage 2a comments] Sport England supports the opportunity to secure this site for sport. However, this policy should be reviewed in the context of the community needs as set out in the Council's emerging Playing Pitch Strategy. The plans submitted for the site (and granted under planning application reference: 18/P1024) show an area of the site reserved for playing pitches to accommodate football (or other sports). The policy could therefore be amended to help secure community access for pitch sports users of the site. The policy should also make it clear whether or not any community use of the tennis courts will also be secured by the Council (the policy mentions programmes for primary aged children, but there is limited information about any other potential community users).	Noted. No further change proposed. Local residents of all ages are already able to use pay and play for tennis on this site and this is being secured by a community use agreement as part of this planning permission; (this is in addition to the programme for free coaching for local schoolchildren through the Wimbledon Junior Tennis Initiative). The council's current and emerging planning policy requires community use agreements on these sites (Policy IN14.3 f. Ensure that all development proposals that include indoor and outdoor sports and recreation facilities maximise the multiple use of these facilities and encourage the co location of services for the local community. This should be formalised through Community Use Agreements.)
45	Sport England	06 Raynes Park	RP6		[stage 2a representation] I note that Merton Playing Pitch Strategy states that this site should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough. At the time of responding there is a live planning application under consideration and NGBs are in the process of considering whether it is viable to meet current sporting needs, or whether a S106 contribution towards nearby playing fields identified in the PPS as requiring improvements in more appropriate in this particular instance.	Noted. At the time of writing (October 2021) the LESSA planning application (20/P3237) is still being determined. The council has written to all the organisations that we have since heard of during the application process of being interested in bringing the site forward for sporting use, requesting the same details from each and the relevant NGBs have been made aware of this. This will be considered as part of the planning application decision which is likely to be determined later in 2021, prior to the Local Plan adoption or examination hearings but after submission to the Secretary of State. Allocation RP.6 is drafted as: Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered. We consider that this proposed allocation is compatible with Sport England's representation.
45	Sport England	06 Raynes Park	RP6		[stage 3 representation] In the case of the LESSA site (RP6) I understand a number of parties have come forward stating their interest in the site for sporting use. Sport England therefore objects to the loss of this site for housing.	Noted. At the time of writing (October 2021) the LESSA planning application (20/P3237) is still being determined. The council has written to all the organisations that we have since heard of during the application process of being interested in bringing the site forward for sporting use, requesting the same details. This will be considered as part of the planning application decision which is likely to be determined later in 2021, prior to the Local Plan adoption or examination hearings but after submission to the Secretary of State. Allocation RP.6 is drafted as: <i>Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered.</i> We consider that this proposed allocation is compatible with Sport England's representation.
45	Sport England	09 Wimbledon	Wi3		[stage 2a comments] As previously stated, Sport England is supportive of this allocation	Noted

45	Sport England	09 Wimbledon	Wi1		[stage 2a comments] Sport England retains its objection – This is a former private health & fitness club with car park. In line with paragraph 93 of the NPPF, Sport England considers that the allocation should be more explicit in seeking to ensure that there is a retention of a health and facility or sports use on this site.	No modification proposed. The former private swimming pool with health and fitness club was closed by its operator Virgin Active in 2017 as part of a viability and demand review of Virgin Active's operations. In 2018 Merton Council opened a new and expanded Morden Leisure Centre, which includes health and fitness facilities, a swimming pool and a diving pool. In 2019 the former fitness building on Battle Close was demolished. In 2020, Merton Council published its Indoor Sports Facilities Study Indoor Sports Facilities Needs Assessment, in accordance with the Sport England Assessing Needs and Opportunities Guidance (ANOG). The study provides an audit and assessment of indoor sports facilities throughout the borough, providing evidence of the supply, demand and quality of facilities. The findings of this study based on the Sport England Facility Planning Model identify an oversupply of water space (swimming pools) of 28.01sqm by 2035; this includes consideration of future population change. The same study identifies 1,224 fitness stations in Merton located and that by 2035 there will be an undersupply of 50 stations. The study states that new health and fitness facilities to make up the -50 deficit should be located in the south and west of Merton which currently lack facilities. Battle Close lies in the centre of Merton, close to existing health and fitness facilities at Colliers Wood and Wimbledon. The study does not identify a deficit in this area. Therefore no additional health and fitness facilities are proposed at Battle Close. https://www.merton.gov.uk/assets/Documents/Merton%20Indoor%20Sports%20Facility%20Study%202020.pdf
45	Sport England	09 Wimbledon	Wi15		Sport England would reiterate its previous objection/comment - It is noted that this site includes a sports hall and gym. It is not known how large this sports facility is and what community use (if any) these sports facilities have. In the context of paragraph 93 of the NPPF the Council should consider whether or not it is important that these uses are retained within any redevelopment of this site.	No modification proposed. The sport use has been retained on site. In June 2021 planning permission (ref 20/P1738) was granted on this site for a new YMCA flats and an ancillary gym
45	Sport England	09 Wimbledon	Wi12		Site Wi12 – Wimbledon Stadium To reiterate, Sport England supports the use of this site for sport. Comments in the plan should where possible reflect what has been agreed through the planning history for this site. I note the reference to retaining and equivalent or enhanced squash and fitness club as part of sporting intensification and welcome this.	Noted. Development is complete on the site as at October 2021 and the squash and fitness facility is being delivered by Hybrid as part of the planning application. The allocation has not changed since the 2014 Local Plan; the planning applications are based on the 2014 policies and allocation and it is not proposed to incorporate the details of the planning application into this site allocation.
45	Sport England	10 Health and Wellbeing	10.1		Strategic Policy HE2.1 Health and Wellbeing. Sport England is supportive of improving and promoting active and healthier lifestyles as set out in this policy. Sport England feels that this aim could be made stronger by including a reference to Sport England's Active Design guidance, with the recommendation that future design proposals follow its principles. Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below: Active design We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design. Ten principles The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often. The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design. http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design	Agreed. We propose a minor modification to incorporate this into the justification of policies H10.1 and the urban design policies and the justification of the relevant policies (e.g. "Developers should consider following Sport England and Public Health England's "Active Design" guide (ref http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design) to help ensure their development's layout and design helps to promote active lifestyles")
45	Sport England	14 Infrastructure	IN14.3		Policy O8.5 [sport and recreation - in Stage 3 reference is IN14.3] – Support – Sport England considers that this policy is in line with NPPF and provides adequate protection and provision for sport	Noted.
45	Sport England	15 Green and blue infrastructure	O15.2		[Stage 2a representations] Policy O8.2 [now O15.2] – Support - Sport England welcomes the Council's intention to protect existing open space (including playing fields) from development. It is considered that this policy is in accordance with the NPPF	Noted.
45	Sport England	N/A			Thank you for consulting Sport England on the latest version of the Local Plan. I have reviewed it and please consider that my previous comments as set out below still stand. [Sport England response to Stage 2a]	Noted and thanks for participating in the Local Plan process with us
46	St William	01B Good Growth		15	Policy 01B - Good Growth Strategy 2.3. St William support Merton's intentions to create socially, economically and environmentally sustainable growth and we understand the importance of following the Good Growth objectives in line with the London Plan. The Council's policy intention to make the most of Merton's limited land whilst improving the quality of the environment and meet planning aims is supported. 2.4. The proposed spatial strategy follows the spatial development principles of the London Plan and on this point the draft Plan should be found sound. As part of the spatial strategy, Mitcham Neighbourhood is designated as a District centre and classified as "high" for residential growth in the London Plan (London Plan - Table A1.1 - Town Centre Network). This is supported, along with the Plan's intention to ensure Mitcham town centre area becomes a 20 minute neighbourhood - makes more efficient and intensive use of land, taking opportunities to provide a mix of tenure of new housing - uses the potential to create an improved physical environment and enhanced connectivity - creates safe and secure environments 2.5. Whilst we have no overarching objection to the spatial strategy, the text on page 11, of the draft plan states: <i>Development will still take place outside of the OA and Morden town centre, although not at the same scale. Outside the growth areas smaller scale development and more incremental change will take place.</i> 2.6. This is somewhat contradictory to the Council's strategic objectives particularly the need to ensure that development makes the most efficient use of brownfield land and would inadvertently suppress the potential of those strategic sites located outside of the OA's. It would also fall foul of the Mayors good growth and housing policies which seek to optimise housing on sites which have good accessibility and are located near to a town centre. To meet the sustainable development principles of the NPPF, the London Plan along with meeting Merton's high housing numbers, means that the Council should take a design led approach to optimise housing on sites. To ensure conformity with the London Plan and the NPPF 'tests' and, so that the draft plan can be found sound, it is suggested paragraph 2 on page 11 is rewritten to state: <i>'Development will still take place outside of the OA and Morden town centre, although not at the same scale. Outside the growth areas where sites are not allocated, smaller scale development and more incremental change will take place. Strategic sites located outside of these areas can make a significant contribution to growth and regeneration, and as such, should adopt a design-led approach that seeks to optimise housing delivery whilst delivering high quality placemaking and follow good growth objectives. The section below provides further detail on the parts of the borough where the most significant growth is expected to take place.'</i>	Agree minor amend for clarity page 15 "Outside the OA, <u>where sites are not allocated</u> , smaller scale development and more incremental change will take place. Full amendment is not necessary as design-led approach and housing optimisation is already supported in the London Plan and in the relevant chapters of Merton's local plan

46	St William	02 Climate Change			Berkeley has long recognised the importance of reducing carbon emissions to minimise climate change; we were the first homebuilder to launch a climate change policy, and we have already reduced the carbon impacts of our direct operations by more than 70%. As well as, this we were the first homebuilder to deliver carbon neutral direct business operations, which we achieved through driving down emissions, procuring 100% renewable electricity and supporting verified carbon offsetting projects. 2.9. Focusing on efficiencies, we are now going beyond Government requirements by compiling a zero carbon transition plan for each new development to enable the homes to operate at net zero carbon by 2030. This is to ensure we incorporate the right long term infrastructure into our developments. We therefore support the Councils intentions to ensure the Local Plan plays a role in mitigating and adapting to climate change and maximising environmental benefits. 2.10. As part of the Berkeley Group, St William are working towards one of the industry's most ambitious science-based targets for reducing the full scope of greenhouse gas emissions connected to our business. This includes reducing our absolute direct emissions by a further 50% by 2030, and reducing the emissions intensity of our supply chain and our homes by 40% by 2030. This puts us on course to be a carbon neutral business by 2040, and we aim to achieve this while delivering a 50% increase in the number of homes we deliver. 2.11. It is considered that climate change policies should be outcome focussed - the overly prescriptive energy policies as currently set out in chapter 2 can limit freedom to deliver the most suitable and effective long term carbon/sustainable strategies for a site. Inflexible policies, can impact on development viability and render sites undeliverable, especially on former gas works sites which are more expensive to deliver than other types of brownfield land. On this basis policy CC2.1 needs to include wording to allow for a level of flexibility, so that the most appropriate solutions can be delivered on a site by site basis, ensuring the optimum reduction in carbon emissions is reached.	No change proposed. Merton's policies in chapter 2 are outcome focussed towards achieving zero carbon
46	St William	02 Climate Change			The Plan states that there are a number of shortcomings to London Plan policy which policies CC2.2 – CC2.5 seek to address by 'going beyond the London Plan requirements'. Whilst it is understood that the Council wish to genuinely achieve its net-zero carbon target, the London Plan was adopted earlier this year and its policies are considered up to date – it is not the place of a Local Plan to contest an adopted regional spatial strategy, the draft Local Plan policies should conform to the London Plan if it is to be found sound.	No further change proposed. The requirement is for local plans to be in general, not absolute, conformity with the London Plan. The GLA has considered Merton's Local Plan and does not identify any issues of general conformity relating to Merton's climate change policies, nor does the GLA challenge Merton's evidence base for these.
46	St William	02 Climate Change			The draft local plan can set out 'aspirational targets in relation to tackling climate change but this should not be applied rigidly nor should it hinder housing delivery	No change proposed. Merton's housing viability study 2020 demonstrates that Merton's climate change policies are generally viable over the lifetime of this local plan
46	St William	02 Climate Change			Policy CC2.2 (a) states that all development should be in accordance with 'the London's Energy Hierarchy below, or in line with any future locally derived methodology'. The wording 'in line with any future locally derived methodology' is onerous, without knowing any detail or having any evidence to underpin this, this is considered to be an ineffective part of the policy and should be deleted to ensure the Plan can be found sound	Noted, this wording has been removed. The new wording reads: a. To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London's Energy Hierarchy below.
46	St William	02 Climate Change			Policy CC2.4 seeks to ban gas boilers in all new dwellings by January 2023 – this does not follow Government legislation; Future Homes Standard is likely to adopt this approach from 2025 and therefore the policy will need amending on this basis. 2.16. The NPPF makes it clear that in plan making all policies should be justifiably achievable and deliverable. Paragraph 34 of the NPPF states that Plans can set contributions expected from development (including infrastructure) but when doing so, should not undermine the deliverability of the Plan. Having a blanket ban on gas boilers would not necessarily achieve the low carbon strategy as proposed by the Council and would impact on viability on many brownfield sites, overburdening sites and rendering them unviable. On this basis the ban from 2023 is not in line with the NPPF, nor does it conform to the Mayor's low carbon and energy policies.	The Clean Growth Strategy highlighted the importance of ensuring that all new homes can accommodate low carbon heating in order to avoid the need for expensive retrofit further down the line. Low carbon heating generally requires different space heating design standards to gas heating as the former tends to operate most effectively using a low temperature system whereas the latter operates at high temperatures. A building typically has a lifespan longer than 30 years, so any new building which is designed and built to use a high temperature heating system will require retrofit to move to a low carbon system before 2050. In their 2019 study on the costs and benefits of tighter energy efficiency standards, Currie & Brown demonstrated that delayed action in decarbonising heat would have a significant carbon impact: each year of delay in adopting lower-carbon heat technologies could result in several million tonnes of avoidable carbon emissions. They found that a home built to use gas heating in 2020 which is retrofitted to use a heat pump in 2030 can be expected to emit over three times more carbon over 60 years than if the heat pump was installed from the start, as the house would have originally been built to different space heating design standards. The costs of installing low carbon heat as a retrofit are also between three and ten times higher than delivering them in a new building. All buildings in Merton must be gas free by 2050 in order to achieve our carbon reduction target, unless the Government plan to supply a low carbon gas through the gas grid. There is increasing interest in the use of hydrogen and biomethane as low carbon alternatives to gas, but insufficient evidence is currently available to demonstrate that either of these are credible options for wide-scale decarbonisation of heat in the short term. The UKGBC recently concluded in their Net Zero Whole Life Carbon Roadmap (2021) that there is increasing consensus that although there is a clear role for hydrogen within sectors such as industry and transport, there is limited rationale and significant uncertainty around the use of hydrogen to heat buildings (other than in areas surrounding industrial clusters). Currie & Brown found that low-carbon heat using a heat pump is cost effective when built into new homes from 2021 and should not increase running costs if the system is well designed, installed and operated, particularly in well-insulated buildings. Heat pump deployment in new build properties will also play an important role in helping
46	St William	04 Mitcham	Mi16		St William are encouraged to see that the land containing the gasholder (located to the north of the site) is now formerly included within Site Allocation Mi16 and this change is supported. 2.18. The text relating to existing uses within the allocation is misleading; only a very small part of the site was used previously for some office use, which ceased at least 15 years ago. Therefore, the 'Existing Uses' test should be updated to state: 'Existing uses: The site is currently vacant, with only a small part of the site having most-recently historically been used as regional satellite offices for National Grid.' 2.19. The principle of residential led mixed-use development with open space and community use (clinics, health centres, crèches, day nurseries, day centre) is generally supported	Additional modification for accuracy: Existing uses: The site is currently vacant for c 15 years aside from a large gasholder within the northern corner of the site that has permission for demolition having most-recently been used as regional offices for National Grid.
46	St William	04 Mitcham	Mi16		As has already been explained, when bringing former gasworks sites forward, the complexities and significant costs associated with their development compared to other brownfield sites creates the need to carefully balance any Site Allocation requirements against specific viability challenges so that the full potential for housing delivery can be realised. To ensure that the Site Allocation policy is compliant to the NPPF soundness tests, the Allocation needs to reference the unique challenges of former utility sites. 2.21. To ensure that Site Allocation policy Mi16 is aligned with the draft Plan's spatial strategy and other cross cutting policies, the London Plan and to ensure compliance with NPPF, it needs to emphasise that the most efficient use should be made of the brownfield strategic sites, which are valuable to bringing forward new homes and meeting the Council's housing targets. In terms of capacity, Policy Mi16 should make it clear that the number of homes to be delivered is a 'minimum'.	No further change proposed. Merton's share of London's new homes as set out in the London Plan and Merton's local plan is a minimum target. Our policies seek to optimise housing delivery in the context of site surroundings, local character, and viability
46	St William	04 Mitcham	Mi16		In line with Mayoral policy, former industrial sites like this across London, should be used in the most effective and efficient manner for the delivery of homes. St William have undertaken further technical and design analysis for the Mitcham Gasworks site, which indicates that 200 homes would be a gross underutilisation of this brownfield site. Following a design led approach and following good growth principles we have shown that the site has the potential to deliver more than the indicative 200 – 400 homes (as currently indicated) in the draft Plan evidence base, it is estimated that the site could deliver circa 600 homes. So that the site follows the draft Plan policies as well as those contained in the London Plan and NPPF and to be found sound, the Site Allocation number should be increased to 'circa 600 homes'. We are happy to share this evidence with the council and have already had discussions with the Development Management team	No further change proposed. The "indicative site capacity" of 200-400 homes is The site's context includes 2 and 4 storey homes, surface car parks and retail sheds. It may be that the careful consideration of all the specific factors for this site through the development management process allows an applicant to exceed the indicative site capacity range of 200-400 homes and achieve a well designed scheme that enhances the local area. However, pending the details of such a scheme achieving planning permission 200-400 homes is considered a reasonable indicative capacity.

46	St William	04 Mitcham	Mi16		<p>Chapter 12 - Places and Spaces in a Growing Borough Policy D12.6 – Tall Buildings</p> <p>2.33. Currently draft policy D12.6 is conflicting and contradicts itself; part of the policy states that <i>tall buildings are most suitable in town centre locations with good access to public transport</i>, text set out further in the policy (points p - r) would mean that this is not the case as it restricts tall buildings to be suitable only in 3 town centres - Wimbledon, Morden and Colliers Wood Town, it omits Mitcham town centre as a place where tall buildings could be suitable. This also conflicts with the draft Site Allocation Mi16, whereby <i>tall buildings may be suitable</i>.</p> <p>2.34. The London Plan policies GG2 and H1(2) make it very clear that available and suitable brownfield sites (like the former Mitcham Gasworks site) should be optimised for housing delivery, 'especially those which are located within 800m distance of a station to town centre boundary'. In terms of location, Policy D9 of the London Plan requires tall buildings to be identified in development plans and 'should only be developed in locations that are identified as suitable in Development Plans'; recent planning decisions (including Mayoral and SoS called in decisions) have demonstrated that there is very little flexibility to this. To ensure consistency within the draft plan itself and to ensure London Plan conformity, Policy D12.6 should include a reference that supports taller buildings on larger site allocations, located in all town centres where a design led approach is followed. Without this change, optimised, design led solutions for larger strategic sites located in town centre areas across the entire borough will be indirectly effected and housing growth unduly restricted. Given the significant costs of bringing land forward for development, particularly on former brownfield utility sites, the inability to deliver a taller building on a regeneration site and optimise numbers would impact development viability to the point that it becomes unviable and undeliverable, threatening the future delivery of homes.</p> <p>2.35. Given its context, the site characterises and viability issues, as well as its location close to Mitcham town centre, accommodating a taller element on the former gas works site will be fundamental to the design-led approach to unlock the site and optimise housing in line with the London Plan. Draft policy D12.6 should therefore, be amended so that tall buildings are permitted in all town centre areas subject to design led masterplans.</p>	The tall buildings policy D12.6 has been amended following discussions with the GLA. The changes clearly identify site allocations that are appropriate for tall buildings. Site Mi16 is one of these sites.
46	St William	11 Housing	H11.1		So that the draft Local Plan can be found in accordance with the draft London Plan and to be deemed as 'sound', text from draft London Plan footnote 59 should be referenced and included as part of draft Local Plan policy H11.1.	No further change proposed. The London Plan is part of the Development Plan and para 0.0.23 of it makes clear that it is unnecessary for policies to be repeated at the local level. Merton have worked closely with the GLA in the preparation of policy H11.1 and the GLA have formally confirmed that policy H11.1 is consistent and in conformity with the London Plan.
46	St William	11 Housing	H11.2		<p>The draft Plan states that 11,732 additional homes are to be delivered for the period 2020/21 to 2034/35 which equates to 782 homes per year, for the 15 year timeframe of the Plan. This is in contrast to 13,263 additional homes set within previous consultations.</p> <p>If the new approach is taken forward by Government, the annual housing requirement for LBM would increase to 1,193 homes per annum, equating to 17,905 across the Plan period and would need to be considered if the Plan was to be found 'sound'.</p> <p>In addition to the above, if the Plan is taken forward, the word 'minimum' should be included in draft policy H11.2 'Housing Provision' to ensure longevity of plan and provide accordance with regional and national policy.</p>	<p>The draft local plan accords with the London Plan. Para 0.0.21 of the London Plan states: The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.</p> <p>Para 0.0.22 of the London Plan states: The Plan does not meet all of London's identified development needs. Work will need to be undertaken to explore the potential options for meeting this need sustainably in London and beyond. This is a matter for a future Plan, and requires close collaboration with local and strategic authorities and partners. Clear commitment from the Government is essential to support the consideration of these options and the significant strategic infrastructure investment requirements associated with them.</p> <p>The word minimum is already included in policy H11.2.</p>
47	Suez Recycling and Recovery UK Ltd	01B Good Growth		19, para 2	Chapter 01b. Good Growth Density and mixed uses Page 19, paragraph 2 within this section repeats Morden twice, as follows. "We will expect high quality developments with higher densities, where appropriate, that can appropriately be delivered by the efficient use of land, particularly in neighbourhoods with good accessibility to public transport and in Merton's Opportunity Area. In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood" SUEZ assume that one of these references should be Mitcham, to accord with the high residential growth potential classification set out in the London Plan Town Centre Network.	Additional modification proposed for clarity and to align the neighbourhoods with those identified in the opportunity area In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough's acute housing needs.
47	Suez Recycling and Recovery UK Ltd	01B Good Growth		19 para 4	<p>Page 19, paragraph 4 states that taller buildings can be right in some locations, subject to excellent design, good public transport accessibility, impact on existing character, heritage and townscape. However, London Plan Policy D9, 'Tall Buildings' states that Development Plans should define what is considered a tall building for specific localities (not less than 6 storeys or 18 metres) and determine if there are locations where tall buildings may be an appropriate form of development and identify these on maps in development plans.</p> <p>The accompanying text at paragraph 3.9.2 of the London Plan states that Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking three steps:</p> <p>"1. based on the areas identified for growth as part of Policy D1 London's form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place</p> <p>2. in these locations, determine the maximum height that could be acceptable</p> <p>3. identify these locations and heights on maps in Development Plans."</p> <p>The aim of the policy and accompanying text in the London Plan is to provide some certainty on what would constitute a tall building in different areas of the Borough and where those buildings may be appropriate, in a highly visible and clear way. However, the text on Page 19, paragraph 4 of MLPS3 provides a broader description of the suitability of tall buildings. It is noted that Policy D12.6 of MLPS3 is specific to tall buildings, however, once again, this provides a less specific framework than is required by London Plan Policy D9 and the accompanying text by specifically, identifying appropriate areas, determining maximum heights and identifying those on maps.</p> <p>As much of Merton's growth is to be within the Opportunity Area (OA), it would be useful to understand specifically where the approach to tall buildings could be applied in order to be consistent with the London Plan. The outline planning application for Benedict Wharf which has been approved subject to the completion of a Section 106 agreement, permits the construction of buildings up to 10 storeys.</p> <p>As with the Merton Local Plan Stage 2A consultation, there remains some inconsistency between the description of the OA and the location of the neighbourhoods on the policies map. For example, Mitcham is identified as an area 'Outside the Opportunity Area', however, the policies map clearly demonstrates that the OA falls within Cricket Green, Church Road and Mitcham Bridge. SUEZ would recommend a simple amendment to the text to reflect that the OA does fall within some of the neighbourhoods within Mitcham and those areas will be targeted for higher growth.</p>	Additional modification proposed to bring it in line with the MM relating to tall buildings <u>In accordance with the London Plan 2021</u> , taller buildings are one form of high-density development that can be appropriate in some of the locations identified in this plan subject to excellent design, good public transport accessibility, and impact on existing character, heritage and townscape. The architectural quality and materials will need to be of an exemplary standard to ensure that the appearance and architectural integrity of the building is kept through its lifespan.
47	Suez Recycling and Recovery UK Ltd	01B Good Growth			As with the Merton Local Plan Stage 2A consultation, there remains some inconsistency between the description of the OA and the location of the neighbourhoods on the policies map. For example, Mitcham is identified as an area 'Outside the Opportunity Area', however, the policies map clearly demonstrates that the OA falls within Cricket Green, Church Road and Mitcham Bridge. SUEZ would recommend a simple amendment to the text to reflect that the OA does fall within some of the neighbourhoods within Mitcham and those areas will be targeted for higher growth.	Additional modification proposed on page 22 to align the text for the Mitcham neighbourhood with Figure 2 - map of the proposed Opportunity Area <u>Most of the Mitcham neighbourhood lies outside the Opportunity Area (see Figure 2) aside from parts of the neighbourhood around Church Road and bordering Morden. Growth in this neighbourhood should contribute to the council's wider vision and objectives for this part of the borough. Mitcham town centre is designated as a District centre...</u>
47	Suez Recycling and Recovery UK Ltd	01C Urban development objectives and vision			Chapter 01C. Urban Development Objectives & Vision SUEZ support the overarching aims of the urban development objectives and vision. Tackling climate change and ensuring resource efficiency are key priorities of SUEZ. We also support the target to deliver more homes and prioritise walking, cycling and public transport and to ensure that development makes the most efficient use of land and that development is designed at the optimum density. This is consistent with London Plan policy D3 and National Planning Policy Framework (NPPF) Chapter 1.	noted
47	Suez Recycling and Recovery UK Ltd	01C Urban development objectives and vision			Chapter 2 Climate Change SUEZ welcome policy CC2.5 requiring a circular approach and encouraging the use of recycled materials. This is consistent with paragraph 3.3.10 of London Plan to "minimise the use of new materials" and Policy SI 7 'Reducing waste and supporting the circular economy'.	noted
47	Suez Recycling and Recovery UK Ltd	04 Mitcham	Mi1		Chapter 04 – Mitcham Site Mi1 – Benedict Wharf SUEZ are the owner of Benedict Wharf and support the allocation of the site for housing. The outline planning application for the residential redevelopment of Benedict Wharf was determined by the Deputy Mayor of London following a public hearing on 8 December 2020. The Deputy Mayor resolved to grant conditional planning permission subject to the prior completion of a Section 106 agreement. A Holding Direction was issued by the Secretary of State on 7 December 2020. This Holding Direction prevented planning permission being issued until the Secretary of State considered the application and reached a conclusion on whether the application should be called in for his own determination. This Holding Direction was lifted on 18 May 2021 and the Secretary of State has confirmed that he is content for the application to be determined by the Local Planning Authority (the Mayor of London). The Section 106 agreement is at an advanced stage and is likely to be completed in September 2021. The planning permission can then be issued, which would enable the sale of Benedict Wharf for residential development, and the construction of our new site (S12 within the South London Waste Plan - Beddington Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH) could then commence. The Section 106 Agreement for Benedict Wharf is subject to a restriction preventing the redevelopment of Benedict Wharf from commencing, until the compensatory capacity at Beddington Resource Recovery Facility is operational. The redevelopment of Benedict Wharf aligns with the emerging South London Waste Plan, which has just progressed through examination and allocates Beddington Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH as a safeguarded waste site and no longer safeguards Benedict Wharf.	noted

47	Suez Recycling and Recovery UK Ltd	04 Mitcham	Mi1		There is an inconsistency between the site allocation figure shown under site Mi1, which includes the adjacent car pound site which is in third party ownership, and the site allocations map as part of the Local Plan, which only includes the SUEZ owned land, as follows	Amended map has been provided to ensure car pound is removed
47	Suez Recycling and Recovery UK Ltd	04 Mitcham	Mi1		It is notable that the approach to tall buildings section of the site allocation text states: "The size of the site allows for a masterplanned approach which could contain taller buildings." While this is a true statement, the outline planning application which has been approved subject to completion of the section 106 agreement includes buildings up to 10 storeys. SUEZ, therefore, consider that this level of detail could be included within the text	no further change proposed. A number of proposed sites for allocation have features that comply with the proposed allocation's position on taller buildings, historic factors, flood risk or other matters. It is not considered practical to identify these. The planning application for this site is referenced within the text
47	Suez Recycling and Recovery UK Ltd	04 Mitcham	Mi1		policy D12.6 is less specific than the London Plan requirement and although individual site allocations contain a reference as to whether tall buildings may be appropriate, there is no reference to analysis of what would constitute tall in any circumstance, other than the definition of minimum 6 storeys. SUEZ consider that more clarity could be provided within the tall building policy or allocations, for example, by providing some clear coding for those sites where tall buildings may be acceptable, on the Site Allocations map.	In the light of representations received on this issue, including the GLA's consideration of general conformity, The council is proposing a main modification to ensure Merton's policy D6 Tall Buildings and other aspects of the plan are in general conformity with the London Plan
48	Telereal Trillium	02 Climate Change	CC2.2		Draft policy CC2.2 (Minimising Greenhouse Gas Emissions), Draft Policy CC2.3 (Minimising Energy Use), Draft Policy CC2.4 (Low Carbon Energy) Our client supports the general thrust of Draft Strategic Policy CC2.1 (Promoting Sustainable Design to Mitigate and Adapt to Climate Change) and this strategic overview is carried through to Draft Policy CC2.2 (Minimising Greenhouse Gas Emissions). The supporting text to this policy clearly outlines the Council's rationale for setting higher minimum standards for on-site carbon reduction than the London Plan targets... Nevertheless, whilst the intention of the Council is acknowledged, it is noted that the minimum on site carbon reduction target for conversions of 35% is the same as the London Plan target for all major development, and Draft Policy CC2.3 (Minimising Energy Use) also reinforces the London Plan target that 10% of the reduction should be provided through energy efficiency measures, such as maximising the efficiency of the building's form, fabric and systems. It is considered that these targets may be difficult to achieve on buildings of heritage value, or indeed statutorily listed buildings where elements of historic significance requiring protection may impact the scope of acceptable internal and external alterations. Consideration of the balance between the energy strategy and heritage is noted in the supporting text to Draft Policy CC2.4 (Low Carbon Energy) at paragraph 2.4.20, which states that "Developments in conservation areas or involving heritage assets need to provide careful consideration of how sustainable energy measure may be incorporated without adversely impacting on the character, function and preservation of a specific area or asset, in accordance with the policies on design in this Local Plan. In such circumstances, development proposals should not presume that a viable sustainable solution cannot be provided. Where necessary, Merton will determine whether the provision of sustainability measures causes any adverse impact with the asset or area, and will prioritise safeguarding of the asset, as appropriate." As such, given the limitations of adapting existing building form, fabric and systems on Listed buildings and other heritage assets, it is considered that the Council should recognise the need to adjust the policy wording and/or supporting text to Draft Policies CC2.2 and CC2.3, to specifically take into account or acknowledge the challenges arising with the conversion of heritage assets/Listed buildings and therefore acknowledge that whilst energy efficiency and carbon reduction measures should be maximised and viable solutions found where possible, that the minimum targets should be considered alongside the safeguarding of the heritage asset as appropriate. This approach is also supported by the NPPF, which states at paragraph 16 that plans should be "prepared positively, in a way that is aspirational, but deliverable" as well as setting out a positive strategy for the conservation and enjoyment of heritage assets, taking into account "the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation" at paragraph 190 (a).	No change proposed. This issue is already considered in D12. Managing Heritage Assets which states at para 12.5.4 In the past there has been tension between the requirements to improve the energy performance and reduce carbon from buildings that are or that are located within heritage assets and the need to conserve these historic assets. We are supportive of efforts to tackle the climate emergency and will positively consider proposals for retrofitting buildings that are themselves or within heritage assets, where these proposals do not cause substantial harm to the heritage assets"
48	Telereal Trillium	11 Housing	H11.3		We acknowledge the proposed borough-wide target mix, but wish to highlight that we find it extremely important to maintain flexibility as set out in the policy and supporting text, as quoted above, as site-specific circumstances (i.e. listed buildings, conversion of/working within the constraints of an existing building, etc.), economic considerations and a site's location (i.e. well-connected, access to local services/public transport, etc.) are important factors why a different unit mix may be justified and acceptable. This approach is also supported by the NPPF, which states at paragraph 16 that plans should be "prepared positively, in a way that is aspirational, but deliverable".	Noted. No further change proposed.
48	Telereal Trillium	14 Infrastructure	IN14.2		Draft policy IN14.2 (Social and Community Infrastructure) We support the proposed updates to Draft Policy IN14.2 (Social and Community Infrastructure). Specifically, we note the inclusion at point b (ii), that any proposals involving a loss of community or social infrastructure, in addition to ensuring no shortfall in provision through a Community Needs Assessment, must also demonstrate "that there is no viable demand for any other social and community infrastructure use on the site, through providing marketing and vacancy evidence for a period of at least 12 months, unless it forms part of a wider public service transformation plan" [our emphasis underlined]. It is noted that this last point is in compliance with point F 2 of Policy S1 (Developing London's social infrastructure) of the London Plan (2021), which notes that developments involving a loss of social infrastructure should only be permitted where "the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services". As such, this draft policy is considered to be in accordance with the requirements of the London Plan, and the addition of this clarification is considered sound. Our client considers this to be an extremely important element of the proposed policy wording, as major (purpose-built) social infrastructure assets of key public organisations such as the Metropolitan Police, i.e. in this case the former Tooting Police Station, often form part of a wider estate strategy. It is therefore strongly supported that LB Merton aligns Draft Policy IN14.2 with the London Plan and therefore allows Officers and developers to work closely together in identifying and developing proposals for the future use of assets which have been identified as being surplus to the requirements of their former (public) occupiers without significant delays.	Support for this policy is noted.
49	TfL Commercial Development	01C Urban Development Objectives and Vision			Merton's Vision and Objectives TfL CD continues to support the proposed vision for Merton and, in particular, directing higher densities to the most sustainable locations with good public transport and sustainable transport choices and making the most of the limited land by applying a design-led approach to determine the optimum development capacity of sites.	Noted
49	TfL Commercial Development	03 Colliers Wood	N3.1		Policy N3.1 – Colliers Wood TfL CD generally support this policy.	Noted
49	TfL Commercial Development	03 Colliers Wood	CW1		Site CW1 – Baltic Close, 194-196 High Street Colliers Wood TfL CD generally support this site allocation, although the 4 homes should be indicated as a minimum figure. However, the reference to a potential requirement for docking areas for cycle/scooter schemes is considered unclear, particularly given the infrastructure requirement section then says that this is something that would be welcomed rather than required. A requirement for this site to be a docking area is considered overly onerous given the scale of the site.	Wording amended to clarify requirements in relation to cycle parking/hub and cycle hire scheme docking stations. The Council would welcome the use of the site as a hub for commuter cycle storage, particularly if the redevelopment of the site in accordance with the site allocation was not viable and unlikely to proceed.
49	TfL Commercial Development	03 Colliers Wood	CW4		Site allocation CW4 - Colliers Wood Station and 2-24 Christchurch Road TfL CD generally support this site allocation. The same points raised in Site CW1 apply though; the capacity figure should be a minimum and there should be further clarity around expectations for the docking area	Wording amended to clarify requirements in relation to cycle parking/hub and cycle hire scheme docking stations.
49	TfL Commercial Development	05 Morden	N5.1		Criterion e provides support for tall buildings within the Morden Regeneration Zone and in limited locations within the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. However, as set out above the council should be mapping areas which are suitable for tall buildings and setting what they consider to be maximum/appropriate building heights in those areas. Early feasibility studies undertaken for site Mo4 indicate that tall buildings are likely to be suitable across the majority of the site. TfL CD would be keen to work with the council to consider what might be a suitable approach to mapping and setting maximum heights for this site allocation	The Strategic Heights Diagram for the Morden Regeneration Zone, introduced with proposed Major Modification MM3.1, now clearly indicates the maximum heights allowed within the site allocation.
49	TfL Commercial Development	05 Morden	N5.1		Background TfL CD is working with the Council to deliver mixed-use development and new homes within the borough. Across our portfolio of London sites, TfL CD will be delivering 50% of new homes / habitable rooms as genuinely affordable housing in a range of tenures. We will be seeking partners for mixed-used development within Morden Town Centre, working alongside the council. In addition, we have a portfolio of major sites that we will be looking to develop in years to come – focussed on delivery of optimal, high quality housing and public realm around stations and rail infrastructure – in areas such as Colliers Wood, South Wimbledon and the wider Morden town centre area. All of TfL CD's projects are focussed on delivering optimal, high-quality housing, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice.	TfL's continued commitment to deliver sites and in working with the council to deliver the Morden Regeneration Zone, is noted.

49	TfL Commercial Development	05 Morden	N5.1		<p>Policy N5.1 - Morden Morden has been identified as one of the major growth and housing opportunity areas in south west London by the Mayor of London, TfL and the London Borough of Merton. TfL are a substantial landowner within Morden town centre and have identified land assets within this area as having the potential to deliver a substantial amount of development. LBM is also a substantial landowner with Morden Town Centre. Both organisations have been working together to assess the feasibility of potential aggregation of land assets to enable wider comprehensive regeneration proposals. TfL CD are committed to investing in significant regeneration through intensified development. With respect to this, TfL CD strongly supports the strategic proposals for Morden town centre. In particular these are supported by the London Plan objective GG2 which sets out that those involved in planning and development should proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting high density development, particularly on sites that are well connected by public transport. TfL CD are particularly supportive of the requirement for high density development in order to intensify the use of the land at this key location.</p> <p>It is important that the focus area includes the entire town centre so that a fully informed set of masterplan principles can be developed in order to establish a strong and robust policy framework in which to facilitate effective regeneration of Morden town centre. This should include areas that could come forwards as later phases in the future and areas that may not be developed per se, but which should form part of the specific Town centre context. As such, the approach to highlighting the site allocations and the Wider Morden Town centre area is supported. TfL would like to continue to work productively with the council to ensure the optimum policy and site allocation is presented in the final version of the Local Plan.</p>	<p>TfL's continued commitment to invest and work with the council to deliver the Morden Regeneration Zone, is noted</p> <p>The Strategic Heights Diagram for the Morden Regeneration Zone, introduced with proposed Major Modification MM3.1, now clearly indicates the maximum heights allowed within the site allocation. The removal of references to the potential appropriateness of tall buildings within some locations in the Wider Morden Town Centre Area (WMTCA), but outside the Morden Regeneration Zone, results in the designation of the WMTCA no longer being justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan. All references to the WMTCA are therefore proposed to be removed.</p> <p>The removal of the WMTCA does not preclude the creation of local design guidance for the area, if deemed necessary, and as the details of a possible future Opportunity Area Planning Framework are still unknown, it is considered reasonable and justified to include the former WMTCA in the Merton Opportunity Area boundary.</p>
49	TfL Commercial Development	05 Morden	M04		<p>Policy Mo4 – Morden Regeneration Zone Morden Station Offices and Retail Units, Morden Station Surface Car Park and Sainsbury's (Peel House) Car Park each benefit from existing site allocations within the 2014 Local Plan. TfL support the inclusion of the three existing site allocations and the Underground Station as a single allocation. This will enable the consideration of the regeneration of the site as part of a wider comprehensive master planning exercise to provide a range of uses including residential, retail and community uses.</p>	<p>Support welcomed.</p>
49	TfL Commercial Development	05 Morden	M06		<p>Site Mo6 - York Close Car Park York Close Car Park benefits from an existing site allocation within the 2014 Local Plan, and the proposed site allocation in the Local Plan for residential use is supported, as is the inclusion of the site as part of the Wider Morden Town Centre Area. TfL CD appreciates the amendments made in response to our Rag 18 representations.</p>	<p>Support welcomed and note comments elsewhere to the respondent for the reasons for the proposed removal of the Wider Morden Town Centre Area (WMTCA) and that it does not preclude the creation of local design guidance for the area, if deemed necessary, and as the details of a possible future Opportunity Area Planning Framework are still unknown, it is considered reasonable and justified to include the former WMTCA in the Merton Opportunity Area boundary.</p>
49	TfL Commercial Development	05 Morden	M06		<p>Morden Depot This site comprises a 5.64ha parcel of land, currently in use as a London Underground operational facility along with an ancillary parcel of land to the north. The site is included in the Wider Morden Town centre Area and represents a large piece of brownfield land in an accessible location. TfL have identified that in the future there may be potential to reconfigure the site in a more efficient manner to enable redevelopment of parts of the site. Should this be feasible, the site could have the potential to deliver a substantial amount of development, subject to the safeguarding of the operational facilities. This is something that will continue to be explored, however it is not considered this would be a shorter-term aspiration. As such, its inclusion in the Wider Morden Town centre Area, and not as part of a site allocation, is supported.</p>	<p>Note comments elsewhere to the respondent for the reasons for the proposed removal of the Wider Morden Town Centre Area (WMTCA) and that it does not preclude the creation of local design guidance for the area, if deemed necessary, and as the details of a possible future Opportunity Area Planning Framework are still unknown, it is considered reasonable and justified to include the former WMTCA in the Merton Opportunity Area boundary.</p>
49	TfL Commercial Development	07 South Wimbledon			<p>Policy N3.5 – South Wimbledon The general intent of this policy is supported, in particular the proposal for a new Local Centre at the heart of the South Wimbledon, focussed around the underground station and junction and the reference to support for suitable redevelopment of the South Wimbledon Station. It is noted that the policy entry states that public space and a secondary public entrance to the underground station is encouraged, which is considered appropriate. Reference should also be made to the potential for residential development above the shops and station to enable efficient use of a highly sustainable location, in line with policies in the London Plan and NPPF.</p>	<p>No further change proposed. Site W18 South Wimbledon Station is allocated for this</p>
49	TfL Commercial Development	05 Morden	N5.1		<p>In terms of the policy wording itself, TfL CD appreciates the amendments made in response to our Rag 18 representations. However, we still have the following comments: Criterion a has been amended from "Any proposal that hinders the delivery of comprehensive regeneration will be resisted" to "Proposals that assist the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo4, will be supported." It is considered that this amendment waters down too much the principle of seeking comprehensive development on this site and it is suggested that it reverts to the original wording.</p>	<p>The post-Reg.18 'Stage2a' consultation policy wording changes referred to, were made to ensure that the policy is 'justified', following confirmation in early 2020 that the Mayor of London will not be funding the Morden town centre regeneration project via the Land Fund.</p> <p>The Reg.19 'Stage 3' draft now also clarifies in paragraph 5.1.58 that "...with the assistance of grant and investment funding, the Morden Regeneration Zone Site Allocation (Mo4) can be delivered."</p> <p>For similar reasons, associated (post Reg.18 'Stage2a') changes were also made to the Morden Regeneration Zone site allocation (Mo4): "Any development proposals brought forward should be based on a comprehensive plan for the entire site. All proposals within the Morden Regeneration Zone are expected to support the above vision and to assist with the delivery of comprehensive regeneration, which realises the full potential of this highly accessible town centre site and delivers the above regeneration vision."</p> <p>Additional Modification AM5.7 seeks to provide further clarification for the policy approach to allow incremental proposals that support the vision and assist with the delivery of comprehensive regeneration: <i>There are also multiple other land ownership interests within the Morden Regeneration Zone and a land assembly strategy will be required to ensure that the site can be developed in a comprehensive manner, to regenerated comprehensively and avoid fragmented development and suboptimal densities in this highly accessible location. References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method.</i></p>
49	TfL Commercial Development	07 South Wimbledon			<p>South Wimbledon Station and 1-7 Morden Road This site comprises the Grade II Listed station and adjacent commercial premises (see accompanying plan). The site is available and developable for residential or mixed-used development, subject to feasibility studies (taking into account the listed nature of the station). A site allocation should be considered for this site</p>	<p>No further change proposed - see Site allocation W18 South Wimbledon station</p>
49	TfL Commercial Development	11 Housing	H11.1		<p>Policy H11.1 – Housing Choice TfL CD follow a portfolio approach in line with London Plan Policy H4 which provides the flexibility for more complex sites to come forward with a lower affordable housing provision where that site would be unviable if it had to provide the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. It is suggested that reference to the portfolio approach is included in the policy for clarity and to ensure the plan is consistent with the London Plan.</p>	<p>Noted. No further change proposed. Supporting para.11.1.37 states that in seeking affordable housing regard will be made to site characteristics, such as economics of provision such as financial viability. It is considered unnecessary to include this specific suggested approach. The London Plan makes it clear that duplication of the London Plan in local plans is unnecessary. Furthermore the GLA have confirmed that Merton's draft local Plan housing policies are in conformity with the London Plan.</p>
49	TfL Commercial Development	11 Housing	H11.2		<p>Policy H11.2 – Housing provision We note the reduction in the Council's housing delivery ambitions; the target to deliver a minimum of 13,263 set out in the Reg 18 version of the draft Plan has been reduced to 11,732 during the period to 2036. The London Plan notes that Merton's 10-year housing target is 9,180 but if you pro rata this figure to reflect a 15-year timescale then this would be a housing target of 13,770 over the 15 years. It appears that for the last 5 years of the 15 year period the council are suggesting an average annual housing delivery of 503 units which is a significant drop compared to the first 10 years (with an average of 918 units per annum), and appears to be the reason that the 15 year figure has reduced. It is noted that this has been informed by the 2017 SHLAA but on looking at the SHLAA it is not clear where the annual target for 2029/30 – 33/34 (474 units per annum) and 2034/35 – 40/41 (548 units per annum) has come from within the SHLAA. It is acknowledged that the 11,732 is stated as a minimum but TfL CD suggest that the council are more optimistic about housing delivery in the latter part of the plan</p>	<p>Noted. No further change proposed. The council's target beyond 2028/29 is in accordance with the methodology set out in the London Plan. The GLA have formally confirmed that the local Plan's approach to housing numbers are consistent and in conformity with the London Plan.</p>
49	TfL Commercial Development	11 Housing	H11.7		<p>Policy H4.7 - Build to Rent TfL CD appreciates the amendments made since the Regulation 18 consultation and support the policy which is in line with London Plan Policy H11.</p>	<p>Support noted.</p>
49	TfL Commercial Development	12 Places and spaces in a growing borough	D12.6		<p>Policy LP D12.6 – Tall Buildings TfL CD is supportive of tall buildings being allowed in the town centre of Colliers Wood, Morden and Wimbledon. The policy should also allow for tall buildings within South Wimbledon given the high PTAL of this local centre, and in order to optimise development capacity in line with Policy GG2 and Policy D3 of the London Plan. However, the current policy approach to tall buildings in the Merton Plan is not in conformity with the London Plan 2021 Policy D9, and the council should be mapping areas which are suitable for tall buildings and setting what they consider to be maximum/appropriate building heights in those areas.</p>	<p>The policy has been reviewed and amendments have been made.</p> <p>Policy D12.6 has been adjusted to be in conformity with London Plan as per our Statement of Common Ground with the GLA.</p> <p>Additional 'Strategic Heights Diagrams' have been included that highlight an approach to areas appropriate for taller buildings within Colliers Wood, Morden and Wimbledon.</p>
49	TfL Commercial Development	12 Places and spaces in a growing borough	D12.3		<p>Policy D12.3 – Ensuring high quality design for all developments Criterion g requires that all development should protect new and existing development from visual intrusion. It is not clear what visual intrusion constitutes but this could be read as providing some protection for views which would be an overly onerous requirement in an urban setting. As raised in our Regulation 18 consultation response, with regard to Criterion v there should be some guidance on what the inclusion of 'sufficient capacity to accommodate increase recycling requirements' might constitute. This seems quite an arbitrary requirement which would likely be difficult to account for. These amendments would ensure the policy is positively prepared and effective.</p>	<p>The policy wording has been reviewed and amendments have been made.</p> <p>Overlooking distances have historically been used to inform the design and separation distances of new development. This does not reflect the variety and diverse character that represents the borough. As such, the policy wording does not provide specific parameters.</p> <p>Justification text D12.3.7 has been added to add clarity to the policy D12.3.g by referencing the current consultation draft of the Mayor's Good Quality Homes for all Londoners Guidance</p>

49	TfL Commercial Development	12 Places and spaces in a growing borough	D12.5		Policy D12.5 – Managing heritage assets It is still considered that this policy still does not effectively reflect the difference between a designated and non-designated heritage asset. The requirement for 'clear and convincing justification' and the phrase 'substantial harm' are related to a designated heritage asset as set out in paragraph 200 and 201 of the NPPF. The test for a non-designated heritage asset is a balanced judgement connected to the scale of harm and the significance of the heritage asset as per paragraph 203 of the NPPF. London Plan Policy HC1 (c) states that: 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Therefore, a distinction should be made between designated and non-designated heritage assets in the policy itself in line with London Plan and national policy.'	No further change proposed. Paragraph 12.5.6 lists the different types of heritage assets and identifies them as designated or undesignated
49	TfL Commercial Development	13 Economy and town centres	EC13.1		Policy EC13.1 – Promoting economic growth and successful high streets With regard to criterion 2c and 3e the policy should recognise that in some scenarios there may no longer be the demand for one particular use and, subject to appropriate justification, redevelopment to other uses could be considered (this latter point also applies to Policy EC7.2a). This policy should also refer to the potential for intensifying employment land uses, including the co-location of industrial uses with residential where suitable. Co-location is an innovative land use approach which can help protect existing industrial capacity, whilst also contributing towards meeting identified housing need through on-site residential development, promoting a creative and effective use of available land. TfL CD also believe that there are similar opportunities for the co-location of housing development with transport infrastructure e.g. 'over station development' at railway and bus stations and depots, which should also be included in the Local Plan.	No further change proposed. Co-location is recognised in the London Plan which is part of Merton's statutory development plan. no specific proposals have been presented for over-station developments at railways and bus stations and depots in Merton.
49	TfL Commercial Development	13 Economy and town centres	EC13.3		Policy EC13.3 – Protection of scattered employment sites Part iii notes that proper marketing must be undertaken to justify the loss of scattered employment to residential uses. The amendment from 30 months to 18 months is an improvement, but paragraph 13.3.7 seems to still be referring to 30 months and should be amended.	Additional modification proposed to address this.
49	TfL Commercial Development	13 Economy and town centres	EC13.4		Policy EC13.4 – Local Employment opportunities Criterion c should identify what the minimum period is for jobs to be advertised for to ensure the policy is justified and effective.	No further amendment proposed. The range of development proposals (from 11 homes to football stadium) do not facilitate setting one minimum period that would meet requirements of the developer in all cases. It is reasonable that this can be agreed between the developer and the council on a case by case basis.
49	TfL Commercial Development	13 Economy and town centres	TC13.5		Policy TC 13.5 – Merton's town centres and neighbourhood parades Criterion iv requires that a window display is provided. This appears to be an overly onerous requirement, although clarification is requested on what a window display would constitute. If it is referring to active frontage then this criterion should be removed as this requirement is already covered elsewhere. More generally, town centres are continuing to evolve, and they must be designed to be flexible to weather future changes. It is noted that the justification section does cover this point but there should be some reference in the policy about this flexibility. This policy/justification should reflect that London Plan Policy SD6 (A1) and the NPPF paragraph 86 states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centre and encourage residential development on appropriate sites. This town centre policy could go further to promote mixed use, residential led development in town centres, particularly adjacent to or above transport infrastructure.	no further change proposed. To maintain the vitality of Merton's town centres, which are limited areas on Merton's policies map. It does not preclude development on upper floors
49	TfL Commercial Development	15 Green and blue infrastructure	O15.1		Policy O15.1 – Open Space, Green Infrastructure and Nature Conservation This policy states that the Council will protect and enhance open spaces, green infrastructure and areas of nature conservation. It should be made clear that this relates to open space with some value and which has been informed by a needs assessment of all open space to inform policy in line with Policy G4 of the London Plan, otherwise this could be read as restricting development on all open spaces even if they have no specific value and redevelopment of this open space would be beneficial to the area. The same point applies to Policy O15.2 as well. This amendment is required to ensure the policy is consistent with London Plan policy.	Officers have reviewed this policy wording and the glossary and agree that minor changes need to be made to ensure the terms used throughout the Local Plan are clear. Changes have been made to Policy O15.1, O15.2, O15.3, O15.4, O15.5 and O15.6 and the Glossary to this effect.
49	TfL Commercial Development	15 Green and Blue infrastructure	O15.3		Policy O15.3 – Biodiversity and nature conservation As per paragraph 8.6.2 of the London Plan a distinction should be made between the different status of sites and the contribution they make to wider ecological networks and therefore the level of protection afforded to them, to ensure the policy is consistent with London Plan policy.	The hierarchy of designations is set out in Chapter 17 Appendices. Each site on the Policies Map also has an attribute attached to it which provides these details. Officers are working towards having all Policies Maps made publicly accessible on the website through the new Local Plan so these should be available on adoption. No changes are required.
49	TfL Commercial Development	15 Green and blue infrastructure	P15.10		Policy P8.11 – Improving air quality and minimising pollution It is suggested that criterion c is aligned with the London Plan Policy SI 1 which notes the following (underline emphasis added): Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. Criterion I should more accurately reflect the London Plan, which does not preclude noise-sensitive development near noise generating land uses as long as the noise can be mitigated appropriately. This is particularly pertinent in the case of development near railway lines and is in line with the Agent of Change principle set out in Policy D13 of the London Plan.	Part 'i' has been deleted following officers review. Part 'n' covers the comment made here relating to agent of change, with an updated reference to the London Plan.
49	TfL Commercial Development	16 Sustainable travel	T16.3		Policy T16.3 - Managing the transport impacts of development Previous policy T6.7 criterion c previously noted that: "Major development should be located around town centres or other areas with good connectivity by public transport or be able to demonstrate that planned and funded infrastructure improvements would raise the accessibility level." This appears to have been removed from the latest version. This criterion should be put back into Policy T16.3 given the emphasis on prioritising sites which are well-connected by existing or planned public transport in Policy GG2 of the London Plan.	No change proposed. The proposed policy and supporting text is considered to be effective in achieving the same outcome of previous policy T6.7c and is in accordance with London Plan. Criterion a of policy T16.3 requires development to "a. Submit a transport statement or assessment in accordance with latest TfL guidance, which demonstrates that the scale and type of development is appropriate to the transport accessibility of the site". Supporting text paragraph 16.3.2 expands on this and specifies that "significant, high-density development should be located in town centres and other locations that offer sustainable travel choices and reduce the need to travel by car."
49	TfL Commercial Development	N/A			Thank you for providing the opportunity to comment on the Merton draft Local Plan Regulation 19 submission version. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.	Noted
49	TfL Commercial Development	N/A			Background TfL CD is working with the Council to deliver mixed-use development and new homes within the borough. Across our portfolio of London sites, TfL CD will be delivering 50% of new homes / habitable rooms as genuinely affordable housing in a range of tenures. We will be seeking partners for mixed-used development within Morden Town Centre, working alongside the council. In addition, we have a portfolio of major sites that we will be looking to develop in years to come – focussed on delivery of optimal, high quality housing and public realm around stations and rail infrastructure – in areas such as Colliers Wood, South Wimbledon and the wider Morden town centre area. All of TfL CD's projects are focussed on delivering optimal, high-quality housing, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice. TfL CD has previously submitted the following representations on the emerging Local Plan: -Merton Local Plan Regulation 18. Stage 1 Issues and Options and Call for Sites (January 2018); -Merton Local Plan Regulation 18. Stage 2a (January 2019); -Merton Local Plan Regulation 18. Stage 2a (January 2021).	Noted
49	TfL Commercial Development	N/A			Examination Hearing Sessions TfL CD would like to reserve its position for now and will advise Officers and the Planning Inspectorate at a later date whether it wishes to participate in examination hearing sessions	Noted
50	TfL Spatial Planning	02 Climate Changes	2.1.7		To achieve targets relating to climate change, the potential contribution of car free development to limiting transport emissions should be referred to in this paragraph.	No changes proposed. Policies on car free development are included in detail the sustainable transport policies section 16 as part of a wider package of measures that together contribute towards limiting transport emissions, so it is not considered necessary to repeat this specific policy under the climate change policies.
50	TfL Spatial Planning	03 Colliers Wood	CW1		We welcome inclusion of advice from TfL on access and servicing. The potential use of the site as a cycle hub would need further investigation. More clarity is needed on whether this is intended as part of a wider network of cycle/scooter hire docking stations across the borough, whether it should provide secure cycle parking or provide a hub for a dockless cycle hire or cycle share service. Each of these options may have different spatial requirements. TfL CD as owners of the site will respond more fully on this issue.	Support noted. Wording amended to clarify requirements in relation to cycle parking/hub and cycle hire schemes.
50	TfL Spatial Planning	03 Colliers Wood	CW2		We welcome inclusion of advice from TfL on access and servicing and protection of London Underground infrastructure. The potential use of the site as a cycle hub would need further investigation. More clarity is needed on whether this is intended as part of a wider network of cycle/scooter hire docking stations across the borough, whether it should provide secure cycle parking or provide a hub for a dockless cycle hire or cycle share service. Each of these options may have different spatial requirements.	Support noted. Wording amended to clarify requirements in relation to cycle parking/hub and cycle hire schemes.
50	TfL Spatial Planning	03 Colliers Wood	CW3		We welcome inclusion of advice from TfL on access and servicing and protection of London Underground	Support noted

50	TfL Spatial Planning	03 Colliers Wood	CW4		We welcome inclusion of advice from TfL on access and servicing. The potential use of the site as a cycle hub would need further investigation. More clarity is needed on whether this is intended as part of a wider network of cycle/scooter hire docking stations across the borough, whether it should provide secure cycle parking or provide a hub for a dockless cycle hire or cycle share service. Each of these options may have different spatial requirements. TfL CD as owners of the site will respond more fully on this issue	Support noted. Wording amended to clarify requirements in relation to cycle parking/hub and cycle hire schemes.
50	TfL Spatial Planning	03 Colliers Wood	CW5		We welcome inclusion of advice from TfL on access and servicing.	Support noted.
50	TfL Spatial Planning	04 Mitcham	Mi1		We welcome the commitment by Merton Council to consult with and seek advice from London Trams as well as the requirement for consultation by developers	Support noted.
50	TfL Spatial Planning	04 Mitcham	Mi17		We welcome the requirement to protect the bus stop or to agree an appropriate relocation with TfL	Support noted.
50	TfL Spatial Planning	04 Mitcham	Mi18		We welcome the requirement that any negative impacts on bus operations, including during construction, should be minimised and mitigation provided.	Support noted.
50	TfL Spatial Planning	04 Mitcham	Mi12		We welcome confirmation that bus drivers' facilities must be retained and ideally enhanced as part of any redevelopment of the site and the recommendation that early discussions should take place with TfL London Buses	Support noted.
50	TfL Spatial Planning	05 Morden	Mo6		TfL welcomes application of the 'Agent of Change' principle to take account of the adjacent London Underground depo	Noted
50	TfL Spatial Planning	05 Morden	Mo4		We welcome the requirement to engage with TfL to secure suitable alternative bus stand and bus stop facilities. Replacement facilities should be designed and located to ensure there is no loss of capacity or operational efficiency. We also welcome the requirement for engagement with London Underground to ensure that operational assets are safeguarded and the inclusion of advice from TfL on access and servicing	Noted. The design, location, capacity and operational efficiency of the bus stand and stopping facilities can be addressed as part of the regeneration plans.
50	TfL Spatial Planning	05 Morden	Mo5		We welcome the inclusion of advice from TfL on access and servicing	Noted
50	TfL Spatial Planning	05 Morden	N5.1	5.1.25	We welcome updates to this paragraph which reflect the current status of the Sutton Link project and provide a more accurate description of the route	Support for wording in para 5.1.25 noted. The proposed modifications to part j of policy N5.1 (AM12a) removes the reference to the tram network but the new wording 'Supporting transport improvements that enable sustainable and active travel choices' is more concise and clear that improvements to the existing tram network, bus infrastructure and other sustainable forms of public transport would be supported
50	TfL Spatial Planning	06 Raynes Park	N6.1	6.1.14 6.1.15	We welcome the references to Crossrail 2, a commitment to collaborative working and the inclusion of advice on project status and safeguarding	Support noted.
50	TfL Spatial Planning	06 Raynes Park	RP3		We welcome the inclusion of advice from TfL on access and servicing (included twice in error	Support noted and repetition deleted
50	TfL Spatial Planning	06 Raynes Park	RP4		We welcome the inclusion of advice from TfL on access and servicing (included twice in error	Support noted and repetition deleted
50	TfL Spatial Planning	06 Raynes Park	RP7		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2. We welcome the requirement for engagement and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward	Confirmation and support noted
50	TfL Spatial Planning	06 Raynes Park	RP8		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2. We welcome the requirement for engagement and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward	Confirmation and support noted
50	TfL Spatial Planning	09 Wimbledon	N3.6j		We welcome the intention to secure investment in Wimbledon station. This site is important for TfL operations including the District line and Tram as well as Crossrail 2 and so there will need to be extensive consultation with a number of different teams within TfL	Support and comments noted.
50	TfL Spatial Planning	09 Wimbledon	3.6.12/13		We welcome the reference to Crossrail 2 and the commitment to collaborative working	Support noted
50	TfL Spatial Planning	09 Wimbledon	Wi2		We support the requirement to protect and enhance publicly available cycle parking provision	Support noted.
50	TfL Spatial Planning	09 Wimbledon	Wi3		We welcome reference to TfL's involvement in master planning work and potential infrastructure requirements relating to the amended use of the golf course site as well as the requirement for a comprehensive travel plan covering all landholdings and the Wimbledon Championship	Support noted.
50	TfL Spatial Planning	09 Wimbledon	Wi5		We welcome the requirement for engagement with TfL London Buses to ensure that any redevelopment does not prejudice access to or the operational efficiency of the adjacent bus interchange.	Support noted.
50	TfL Spatial Planning	09 Wimbledon	Wi7		We welcome the requirement for engagement with London Underground Infrastructure Protection and Network Rail regarding any works or development proposals that may impact on rail infrastructure. As noted, the site falls within Crossrail 2 safeguarding limit	Confirmation and support noted
50	TfL Spatial Planning	09 Wimbledon	Wi16		We welcome the requirement for consultation with Network Rail, TfL and Crossrail 2 to ensure that emerging development proposals protect transport infrastructure, are consistent with safeguarding and maximise the opportunities of this site	Support and comments noted.
50	TfL Spatial Planning	10 Health and Wellbeing	HW10.1h HW10.2aii	10.1.19	TfL welcomes the intention to improve the public realm in accordance with the Healthy Streets Approach and to apply the Healthy Streets Approach as part of development proposal	Support noted.
50	TfL Spatial Planning	12 Places and Spaces in a growing borough	D12.2b, v and q		We welcome the emphasis on facilitating walking, cycling and use of public transport, the application of the Healthy Streets Approach as well as the need to improve connectivity and to design and manage car parking so that it does not dominate the street or provide a barrier to safe and convenient movement on foot or by cycle.	Support noted
50	TfL Spatial Planning	12 Places and Spaces in a growing borough	D12.3s		We support the requirement for well-designed cycle parking in accordance with London Plan minimum standards and TfL's London Cycle Design Standards	Support noted
50	TfL Spatial Planning	13 Economy and Town Centres		13.3.9e	We welcome the modified wording of criterion e to better reflect London Plan and Local Plan transport policies by prioritising access by active travel and public transport, providing adequate high quality cycle parking and minimising car parking in accordance with London Plan standard	Support noted
50	TfL Spatial Planning	15 Green and Blue Infrastructure		15.10.39	We support the requirement for Construction Logistics Plans, but they should address strategic as well as local traffic impacts.	Support and comment noted.
50	TfL Spatial Planning	16 Sustainable Transport	T16.1		We support the emphasis on active travel and public transport and welcome clarification that Vision Zero refers to the Mayor's target for road safety	Support noted
50	TfL Spatial Planning	16 Sustainable Transport		16.1.2	We welcome the added reference in section 16.1.2 to the 2041 target of 73% of all trips being undertaken on foot, by cycle or on public transport	Support noted
50	TfL Spatial Planning	16 Sustainable Transport	T16.2		TfL broadly welcomes the positive approach of this policy.	Support noted
50	TfL Spatial Planning	16 Sustainable Transport	T16.2		We support the application of the Healthy Streets Approach to development proposals (part a)	Support noted
50	TfL Spatial Planning	16 Sustainable Transport	T16.2		To expand on part c, it would be useful to set out the proposed cycle network, location of hubs and parking areas identifying any gaps that should be filled through contributions from development.	Comment noted and agreed. An indicative cycle network map, showing the hub locations, has been included and supporting text added and amended (paras 16.2.6/7) to clarify what is shown on the map and the approach developers should take in relation to cycle infrastructure improvements.
50	TfL Spatial Planning	16 Sustainable Transport	T16.2		We welcome the reference to higher level minimum requirements for cycle parking. However, to better reflect the London Plan, part d of the policy should be amended as follows: 'Ensure that cycle parking meets or exceeds London Plan (higher level minimum requirements) and London Cycle Design Standards...'	Agreed. Policy wording of part d amended as follows: "d. Provide secure, covered cycle parking facilities that meet or exceed London Plan standards (higher level minimum requirements) in accordance with London Plan minimum standards (higher level) and comply with London Cycle Design Standards."
50	TfL Spatial Planning	16 Sustainable Transport		17.2.6	Please also refer to guidance in TfL's Streets Toolkit which includes Streetscape Guidance and London Cycling Design Standards (which includes guidance on all aspects of cycle infrastructure	Agreed. Para 16.2.7 of supporting text amended as follows: "...be provided to a high standard in accordance with the latest best practice guidance (DfT Cycle infrastructure design LTN 1/20 and TfL Streets Toolkit, including Streetscape Guidance and London Cycling Design Standards)."
50	TfL Spatial Planning	16 Sustainable Transport	T16.3		We welcome clarification of the role of Construction Logistics Plans in part e and the additional requirement for Delivery and Servicing Plans in part g.	Support noted.
50	TfL Spatial Planning	16 Sustainable Transport		17.3.6	However, it would be useful to provide encouragement for greater use of rail or water freight where appropriate.	Agree Para 16.3.6 of supporting text amended to add "Proposals should also demonstrate that the transport impacts of the construction phase have been mitigated to maximise sustainability and reduce local air pollution, including through the use of rail or river (via The Thames) freight for significant developments where feasible."
50	TfL Spatial Planning	16 Sustainable Transport	T16.4		We welcome amended wording which better reflects London Plan policy T6. In particular we support the requirement to only provide the minimum level of car parking taking into account PTAL and London Plan parking standards and the much stronger support for car free development (part a). We also support a clearer policy on permit free development in CPZs (part b) and enhanced parking controls where necessary (part c). We also welcome the revised approach to car clubs (part e) and reference to TfL's forthcoming Parking Design and Management Plan guidance in part q	Support noted.
50	TfL Spatial Planning	16 Sustainable Transport	T16.4		Although there have been some minor changes to ensure consistency with policy T6 of the London Plan, the wording of part d should be further amended to read: 'Disabled persons' parking should be provided in accordance with London Plan standards and should meet design guidelines, be accommodated within the development site where possible and be provided with electric vehicle charge points.' As acknowledged in paragraph 17.4.7 at some constrained sites it may not be possible to provide all of the required level of disabled persons' parking within the site itself	Agreed. Policy amended as proposed.

50	TfL Spatial Planning	16 Sustainable Transport	T16.4		t would also be helpful if the policy provided support for moving freight by rail, water and non motorised transport as well as the use of consolidation facilities, including micro consolidation	This comment has been addressed in amendments to para 16.3.6. and existing para 16.3.9. No further change proposed.
50	TfL Spatial Planning	16 Sustainable Transport	T16.5	17.5.7	We welcome revised wording of this policy including changes to part a to ensure consistency with policy T3 in the London Plan. We also welcome the addition of a reference and link to Crossrail 2 safeguarding in paragraph 17.5.7	Support noted.
51	Thames Water	14 Infrastructure	IN14.1		<p>14.1.14- 14.1.19 – Water and Wastewater Sound – No</p> <p>We support Policy IN 14.1 in principle and support the specific section on water and wastewater at paragraphs 14.1.14-14.1.19. However, we consider that the need for water and wastewater infrastructure should be specifically covered in a policy.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary..."</p>	Officers have reviewed the policy and held a meeting with Thames Water to discuss this issue. Officers recommend some changes to the Infrastructure policy which includes moving some policy and justification text from Policy F15.7 to IN14.1. It is considered that the infrastructure policy is the most appropriate place for this to be located.
51	Thames Water	15 Green and blue infrastructure	F15.7 F15.9		<p>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage & Policy F15.9 Sustainable Drainage Systems (SUDS)</p> <p>Sound – No</p> <p>These policies are supported in principle. In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>Water Efficiency/Climate Change The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per</p>	Officers have reviewed the policy and following discussions with Thames Water wording has been removed from Policy F15.7(e) into IN14.1 to make the infrastructure requirements clear. Water efficiency is covered in the climate change policy.
51	Thames Water	15 Green and blue infrastructure	F15.8		<p>Policy F15.8 Managing Local Flooding</p> <p>Sound – Yes</p> <p>Basements – Sewage flooding Thames Water's main concerns with regard to subterranean development are: 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application. Paragraphs 15.8.14-15.9.15 in relation to water infrastructure are supported.</p>	Officers have reviewed the policy and following discussions with Thames Water have added additional text for clarity to paragraph 15.8.16.

51	Thames Water	N/A	N/A	N/A	<p>Process</p> <p>We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn't happen it could lead to delays in the delivery of vital infrastructure</p> <p>Network</p> <p>Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here https://www.thameswater.co.uk/developers/charges</p> <p>The time to deliver upgrades shouldn't be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn't outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>	Noted.
51	Thames Water	Policies Map	MOL and Green Corridor	Thames Water site at Byegrove Road	<p>"Policy O15.2 Open Space and Green Infrastructure & MOL designation on Policies Map</p> <p>Site Specific Comments – Thames Water Site at Byegrove Road, SW19 2AY</p> <p>Sound – No</p> <p>Thames Water supported the removal of the Wandle Valley Regional Park designation from the Thames Water Sewage Pumping Station site at Byegrove Road, Colliers Wood in the current plan. Thames Water consider that the site should similarly be removed from MOL and Green Corridor designations on the Policies Map in the new Local Plan.</p> <p>There is currently no public access to the Thames Water operational Sewage Pumping Station (SPS) site for health and safety and security reasons. The SPS site incorporates significant built development including a number of sewage pumping station buildings and two sets of large concrete/brick storm tanks and is not deemed appropriate for MOL designation.</p> <p>Background to Site Operations</p> <p>The site used to be a Sewage Treatment Works (STW), Wandle Valley STW, but this use was disused some years ago and the flows were transferred to Crossness STW, located in LB Bexley, for treatment. Since the STW was disused the site has been used as a Sewage Pumping Station (SPS) and storm flow storage.</p> <p>The existing sewage flows are delivered at a much lower level and the SPS located in the middle of the site lifts the flows up into the Merton Valley Sewer which is a much higher level which finally connects into the network which discharges flows to Crossness STW.</p> <p>There are a number of tanks, previously used for the STW, which are used for storm overflows from the SPS, but they can also hold dry weather flows in the event the SPS fails. These tanks are also used to divert the flows if there are blockages in the network & for any maintenance works Thames Water operations have to carry out on the network.</p> <p>Thames Water have looked into a high level solution for some years to replace the open storm tanks. Instead of open tanks, proposals have been reviewed to install underground vertical tanks and rationalise the whole site into a manageable area.</p> <p>There are also 4 water abstraction boreholes on site as part of the South London Resilience to deliver raw water to South London. These come into operation when water demand is high.</p> <p>The site therefore performs a key operational function in both the sewerage network in preventing sewer flooding and water supply.</p> <p>Case for Removal of Operational Site from MOL and Green Corridor</p> <p>It is considered that there are exceptional circumstances to remove the SPS site from MOL and Green Corridor designations in association with the current Local Plan review, as it is a fully developed brownfield site which does not meet the purposes of MOL/green corridor designation.</p> <p>As previously indicated, Beckton Sewage Treatment Works (STW) has been similarly removed from MOL as part of the Newham Local Plan Review and parts of operational/built up Crossness STW are being removed from MOL in the Bexley Local Plan Review as they are developed in a similar way to the Byegrove Road SP site.</p>	<p>Officers have reviewed the Policy Maps in line with Thames Water's submission. A meeting was also held between officers and Thames Water after the Stage 3 submission was received to discuss these issues.</p> <p>Officers do not agree that the site should be removed from MOL for the following reasons:</p> <ol style="list-style-type: none"> 1. The site meets the following MOL criteria set out in the London Plan G3(B): -The site is clearly distinguishable from the surrounding built up area. While there is some built form to the south and south-east of the site, the majority of the site provides for an open landscape which is nestled between mature trees, the River Wandle and the Wandle Meadow Nature Reserve. It is clearly different from the surrounding residential terrace properties and suburban landscape. - As discussed at the meeting on 5th October 2021, the site photos provided are dated 2018 and 2019. As agreed, a site visit or some more recent photos would be of benefit to this discussion point. - The site forms part of the strategic green corridor that runs along the River Wandle and surrounding areas. This includes parts of the site being designated as Green Corridor, SINC and Open Space. 2. The MOL designation does not restrict Thames Water from using the site for the utilities purposes it is currently being used. 3. The site does not need to have public accessibility in order for it to be designated as MOL. 4. Thames Water has confirmed that while high level proposals for the site have been reviewed internally, no decisions have been made as to future uses/changes for the site. 5. The site does not appear to have changed significantly since the Merton Sites and Policies Plan (SPP) 2014. Thames Water requested the site be removed from MOL in the SPP Examination in Public, however this was not agreed by LBM or the Planning Inspector. <p>Officers agree that the site should be removed from Green Corridor - following a meeting held with Thames Water and the provision of updated site photographs. This part of the site does not meet the Green Corridor criteria and therefore will be removed from the Local Plan as a modification.</p>
51	Thames Water	Site allocations	Site allocations - all		<p>Allocations</p> <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements.</p> <p>In assessing the waste needs of these developments we have assumed that surface waters will be managed on site using SUDs and that foul flows will be connected by gravity. Where development doesn't follow these principles, it will lead to spare capacity within the sewerage infrastructure being rapidly eroded and upgrades being required where they have previously not been anticipated.</p>	Noted. Changes have been made to the Site Allocations, where needed.
52	Tipler J	Policies Map	Open space	Canon Hill Lane 274-313	<p>I object to the removal of Open Space status from the strip of woodland behind 274-312 Cannon Hill Lane. I live at 286 Cannon Hill Lane and have not been notified by Merton council of this proposed change, nor have any of my neighbours whose properties, like mine, border this woodland. I only became aware of this proposed change when a planning application (21/P1851) was submitted to build on the land. Such a decision to change the land's Open Space status without consulting neighbours lacks transparency and is undemocratic.</p>	This objection is noted. The Local Plan process has undertaken a number of consultation rounds since October 2017. The Green Infrastructure Study 2020 was published on the Council's Local Plan Research webpage in August 2020 and has informed the preparation of the green infrastructure policies and maps for the new Local Plan. Both the Stage 2a consultation undertaken between November 2020 and February 2021 and the Stage 3 consultation undertaken between July and September 2021 included the proposed changes to the Policies Maps, including this site.
52	Tipler J	Policies Map	Open space	Canon Hill Lane 274-313	<p>Policy O15.1 (p504 ff)</p> <p>I am concerned that the land behind 274-312 Cannon Hill Lane houses bordering the AELTC's Raynes Park Playing Fields (P002) is no longer listed as having Open Space Status as it used to, according to the lists in https://www.merton.gov.uk/Documents/17%20Appendices%20Merton%20Local%20Plan%20Reg19%20July21.pdf</p> <p>This change can also be seen on the map (https://www.merton.gov.uk/assets/Documents/Raynes%20Park%20Maps_FINAL_.pdf):</p> <p>[map inserted - see original response]</p>	This objection is noted. The site in question is recommended to be removed from the open space Policy Map designation as the site has been reviewed and is not considered to meet the open space criteria set out in the Green Infrastructure Study 2020.
52	Tipler J	Policies Map	Open space	Canon Hill Lane 274-313	<p>Without consulting residents like myself who would be affected by the change, The Environment Partnership recommended the removal of the site's Open Space designation: age 16/41 shows more clearly that The Environment Partnership suggests the removal of Open Space Designation (TEP34): [map inserted - see original response]</p>	<p>The Local Plan process has undertaken a number of consultation rounds since October 2017.</p> <p>The Green Infrastructure Study 2020 was published on the Council's Local Plan Research webpage in August 2020 and has informed the preparation of the green infrastructure policies and maps for the new Local Plan.</p> <p>Both the Stage 2a consultation undertaken between November 2020 and February 2021 and the Stage 3 consultation undertaken between July and September 2021 included the proposed changes to the Policies Maps, including this site.</p> <p>Any changes to the open space designations on the Policies Map, including this site, have been informed by a review of the open space criteria set out in the Green Infrastructure Study 2020. Officers do not recommend any changes.</p>

52	Tipler J	Policies Map	Open space	Canon Hill Lane 274-313	<p>The TEP report states: Site 34: 274-312 Cannon Hill Lane, Raynes Park Open Space (P002) 3.170 This site is located at the rear of six residential properties along Cannon Hill Lane. It is privately owned and is accessible only via a shared and gated driveway in between 320 and 322 Cannon Hill Lane. The All England Community Sports Ground lies directly adjacent to the north and the land to the west is currently unused (formerly a Scout Hall). The site is approximately 0.2 hectares in size and contains overgrown vegetation and some larger trees. 3.171 The site does not form part of the adjacent site known as Raynes Park Playing Fields, however it has been given the same designation. Given that it is landlocked, the site does not offer any public accessibility or visual amenity and is not designated as a Green Corridor or SINC. 3.172 It is recommended that the Open Space designation be removed for this parcel of land as it does not meet the Open Space criteria.</p> <p>However, in the Merton Core Planning Strategy 2011-26, Policy 13, states "21.4 People use open space for exercise, play, socialising and relaxing. Visual accessibility is equally as important as physical access." This is restated in the New Local Plan (p507) 15.2.1. Open space can be multi-functional; people use green and open spaces for many purposes including exercise, play, food growing, socialising and leisure. Visual accessibility is equally as important as physical access. The protection and enhancement of open spaces enables the provision of areas for active and passive leisure activities, has a positive impact on health and wellbeing, provides opportunities for social cohesion ... N Although residents cannot go onto the land, it is "visually accessible" and provides a "positive impact on communities' mental and physical health" for all of us.</p>	Noted. These extracts are from the Green Infrastructure Study 2020 and from the current Core Strategy.
52	Tipler J	Policies Map	Open space	Canon Hill Lane 274-313	At least 27 species of bird regularly frequent the land; pipistrelle bats forage over the trees and other mammals are also present. This land provides an important ecological route from the Pyl Brook/ St Catherine's Field towards Cannon Hill Common. As the AELTC Community Sports Field becomes increasingly developed with domes over tennis courts, its value as a bat foraging area is likely to decrease, so it is becoming ever more important to protect the strip of woodland behind the Cannon Hill Lane houses.	Noted. However, this site is not identified as part of a SINC or Green Corridor and neither is any of the neighbouring or adjoining land. Ecological assessments carried out as part of the approved planning application 18/P1024 for the neighbouring AELTC site identified dense ivy along the boundary of the site which may be of importance to nesting birds. The AELTC site is providing a number of ecological enhancements including bird and bat boxes which will assist in enhancing the value of the site for wildlife.
52	Tipler J	Policies Map	Open space	Canon Hill Lane 274-313	<p>I believe that removing this land's Open Space designation is contrary to Policy N6.1 (page 220): m. Requiring development to respect local character, heritage and amenity in surrounding residential neighbourhoods. and its justification (page 224) 6.1.13. The suburban neighbourhoods within the neighbourhoods will be conserved and enhanced by ensuring that new development respects local character and amenity, and where appropriate historic value. (https://www.merton.gov.uk/Documents/06%20Raynes%20Park%20Merton%20Local%20Plan%20Reg19%20July21.pdf) Loss of Open Space status could allow development on this woodland site which would not "respect the local character, heritage and amenity" for neighbours. Please retain the Open Space status of this site.</p>	<p>Policy N6.1 would be applied to development that comes forward through planning applications. This policy is not applicable when making assessments of open space policy map designations.</p> <p>Any changes to the open space designations on the Policies Map, including this site, have been informed by a review of the open space criteria set out in the Green Infrastructure Study 2020. Officers do not recommend any further changes for this site.</p>
53	Tooting and Mitcham Sports and Leisure Ltd	05 Morden	Mo3		We would also wish to point out an error in the last line of the table at p200; the Public Transport Accessibility Level (PTAL) should be listed as 2 (and not 1), as confirmed in the above mentioned Planning Committee report and by our highway consultants, Waterman	Agreed. This has been amended.
53	Tooting and Mitcham Sports and Leisure Ltd	05 Morden	Mo3		<p>4.4 Consistent with the adjoining Mo3 site, the south stand area does not perform any of these functions and has already in effect been released for development (through the extant planning permission). The site's allocation for mixed use development would therefore not cause any harm to the wider character and function of the borough's MOL. In particular:- it has no public amenity value or access for recreational purposes (it has always been private land)- there are no features of landscape interest- there is no nature conservation or ecological interest on this part of the wider site- there would be no impact on any strategic green chain/link role- there would be minimal impact on the open character of the wider MOL designation, since this part of the MOL has been fundamentally changed through redevelopment of the site, but would still retain an open corridor running through the central part of the masterplan</p> <p>5.1 The South Stand area, which forms an important component of the hub's overall masterplan, should no longer be designated as Metropolitan Open Land (MOL) since it serves no useful purpose or function within it. It already benefits from an extant planning permission; is located immediately adjoining the Mo3 housing allocation; and enjoys good accessibility to public transport including local bus routes and the nearby tramlink.</p> <p>5.2 For the reasons set out in this report, it is concluded that the red line area as shown (Appendix 1) represents a very logical parcel for further release, including the approved footprint of the stand, and importantly retaining the open corridor running through the central part of the masterplan. Furthermore, it would enhance the overall mix of uses within the masterplan, helping to secure the long-term future and viability of the hub.</p> <p>5.3 The redevelopment of both the Mo3 residential site and the adjoining south stand area (as an expansion of the existing hub facilities) would represent a model of good practice for delivering mixed uses and sustainable development, with the new apartments enjoying a natural synergy with the extended sports and community uses encouraging healthy lifestyles.</p>	Officers have reviewed this site and disagree that it does not meet the MOL criteria. The landowner has not demonstrated exceptional circumstances for the removal of this site from MOL. No changes are recommended.
54	United Westminster and Grey Coat Foundation	01B Good Growth			Chapter 01B-Good Growth Mitcham Neighbourhood The Tamworth Lane site is located within the Mitcham Neighbourhood Area. The Foundation support the vision for the area, with good growth positively contributing to reducing deprivation. The Foundation support the vision to reduce inequalities and provide a substantial number of new homes (including affordable housing). This includes making more efficient and intensive use of land. The Foundation support the creation of new public spaces to improve health and wellbeing. The Foundation believe that the Tamworth Lane site can deliver significant public benefit to achieve this vision to the benefit of the local community by bringing the site back into use to provide high-quality housing, as well as realising further investments in the Borough's sporting facilities and potentially providing public access to the site where currently there is none.	Noted
54	United Westminster and Grey Coat Foundation	01C Urban Development Objectives and Vision			Chapter 01C-Urban Development Objectives and Vision The Foundation support the six strategic objectives and believe that the Tamworth Lane site can help achieve them. The Foundation do not make particular comment on a number of the objectives as set out below. Strategic Objective 2-Supporting resilience The Foundation believe that the site allocation at Tamworth Lane can help achieve this objective. The Council will achieve Strategic Objective 2 by building more well-designed new homes, particularly affordable homes and requiring new homes to be sustainable to help significantly reduce carbon emissions. In addition, the Council will seek to ensure public access is provided to formerly private open spaces and improve access to nature and leisure facilities including opportunities for sport, physical activities, play and relaxation. The allocation of the Tamworth Lane site can help achieve this strategic objective through the provision of much needed housing together with exploring the opportunities to create public access where currently there is none. This sits alongside the current exercise to establish whether a viable sporting use can be found over part or all of the site. The provision of housing at Tamworth Lane would make a significant contribution to facilitating a viable sporting use on part of the site through an associated enhanced s.106 payment. Should a viable sporting use not be delivered on part of the site, the creation of housing on the whole site and the associated enhanced s.106 payment would make a significant contribution to facilitating sports elsewhere within Merton.	Noted
54	United Westminster and Grey Coat Foundation	01C Urban Development Objectives and Vision			Strategic Objective 3-places for people The Foundation supports this objective to provide new housing through physical regeneration and the effective use of space. The Foundation believes the Tamworth Lane site can play an important role in meeting this objective by delivering high quality new homes within the Mitcham Neighbourhood. However, we would suggest the following change is made to Part A. Delivering quality new homes, associated infrastructure and social facilities that respect and enhance the local character of the area, in places with good consideration of public transport accessibility and the 20-minute neighbourhood;	No further change proposed. The objectives do not need to consider all aspects of planning policy

54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Foundation's Charitable Objects Delivering Public Benefit in Merton The Foundation is a registered charity operating academies and independent schools in the London area. Ensuring that the Foundation's assets are fully contributing to its charitable objectives is central to its approach to the Tamworth Lane site. The trustees are committed to making sure that these assets are used to advance social mobility, diversity and opportunity for wider public benefit, particularly for those communities where the Foundation has enjoyed historical ties. This careful management allows the Foundation to distribute £1 million each year for educational purposes to its state academies, for targeted bursaries to widen access to its independent schools, for outreach projects with other state schools and to provide additional financial support for disadvantaged students. The challenges presented by Covid-19, and the resulting increase in social divergence and disadvantage, have only reinforced this responsibility, as part of which the Foundation has created a specific 'catapult' fund to aid students affected by the pandemic. It is this mission of public benefit which is at the forefront of the Foundation's thinking, in seeking to realise the value within the Tamworth Lane site to deliver much needed new homes. The Foundation's proposals will not only see further investment in educational opportunities but will help to enhance the Borough's sporting facilities. Moreover, as the latest draft Local Plan rightly sets out, they will make a crucial contribution to delivering on the Council's ambitions for the Mitcham Neighbourhood, contributing to high quality homes to meet the borough's growing housing requirements, and particularly affordable housing needs.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Ongoing Engagement in the Local Plan Review Process The Foundation has played an active part in the ongoing Draft Local Plan review, having submitted representations to the Call for Sites consultation in January 2018 and further representations in January 2019 and in January 2021. As part of the Local Plan review the Council commissioned the Playing Pitch Strategy (PPS) to undertake an up-to-date analysis of the supply and demand for outdoor grass and artificial playing pitches in the borough. This forms an important part of the evidence base to support the overall Draft Local Plan review. The Foundation has supported this process and held detailed discussions with the Council, Sport England and a number of sporting bodies since the commissioning of the PPS and adoption in October 2019. The Foundation has been engaging with the Council in relation to their former playing field site at Tamworth Lane for over four years. During that engagement, the issues faced by the Foundation in seeking to find a viable use for the playing fields and the financial burden of operating the existing facilities have been explained in detail.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Background Historically the site provided additional playing facilities for Westminster City School from around 1920 up to April 2011 when the use by the school ceased, although it has been in the ownership of the Foundation (successor to St Margaret's Hospital) since 1667. Whilst some more limited use by local sports clubs took place up to March 2015, the playing fields are now sitting vacant and a new viable use needs to be found. The long-term renting out of the facilities to local sports clubs was not sustainable due to the financial shortfall which existed as a result. Therefore, it was not financially viable for the Foundation to keep the facilities open and they were closed in March 2015. Detailed information and evidence to explain this process was provided to the Council in January 2019 as part of our ongoing dialogue. With the site sitting vacant and no longer required nor financially viable for the Foundation to run, a new use for the site needs to be found in order to bring the site back into use. As part of the issue of the draft Local Plan in October 2018, the Council proposed an allocation of the site for publicly accessible sports facilities, enabled by residential development. The draft allocation recognised the detailed evidence provided by the Foundation for the historic operation of the site for community uses for rental by local sports clubs, and the financial viability of the site. Importantly, the draft document highlighted the importance of viability in the potential future operation of the site for sporting use. The draft Local Plan also highlighted the need for additional housing generally within the Borough and also the opportunity this site presents to deliver much needed new homes.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Merton Playing Pitch Strategy (PPS) Following the issue of the draft Local Plan in October 2018, the Council prepared the PPS. The Council issued the PPS in August 2019. At the Cabinet meeting in October 2019, the Council adopted the PPS and its recommendations. PPS Recommendations In relation to Tamworth Lane, it recommended that, alongside one other site, a further six-month time limited investigation should be undertaken by the Steering Group to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on these sites. The monies would go to reinvest in other sport facilities in the borough. With the Council adopting the PPS in October 2019, the six-month process concluded in April 2020. The PPS provided a clear recommendation of which sports should be investigated at Tamworth Lane. Recommendation C1 outlines that the Steering Group will work with the ECB in identifying additional pitch capacity to meet the growing cricket demand in Merton as a whole. Tamworth Lane was one of seven sites in the borough for potential investigation during this extended six-month period.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Engagement with the Council, Sport England and Sporting Bodies During this extended period of investigation, DP9 have been in regular dialogue with the Council to support this process and the work of the Steering Group. As part of that dialogue, the Foundation facilitated a site visit to Tamworth Lane in February 2020, ahead of the expiry of the period in April 2020. This was attended by the ECB, Surrey Cricket Foundation (SCF) and the Rugby Football Union (RFU) to view the site and inform their potential development of viable proposals on this site as one of the seven sites they were exploring. Following the site visit in February 2020, the Council held further discussions with Sport England (SE), the ECB and SCF around their interest in the site. The Council asked for more information around the business case to support the expression of interest as part of the need to bring forward viable proposals. The Council were also interested in which local clubs would use the site as none had expressed an interest as part of the detailed work undertaken through the PPS. Detailed discussions were then held between the Foundation, SE, the ECB and SCF in August 2020 to understand their business case for the viable use of Tamworth Lane. The Foundation were also interested in what work had been undertaken to explore which local clubs could potentially operate the site. SE, the ECB and SCF explained that no detailed work had been undertaken around the business case or which local clubs would use Tamworth Lane since the February 2020 site visit. It was explained there was the potential for rugby to also use the site alongside cricket.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Preparation of Site Investigation Report and Pavilion Condition Report A series of next steps were agreed. SE, the ECB and SCF requested that a site investigation report be undertaken to understand the conditions of the site and the costs of bringing it back into a viable sporting use. It was also requested that the Foundation undertake an appraisal of the condition of the existing pavilion building to understand the costs of bringing the building back into use. The Foundation funded the preparation of these reports to allow discussions to continue. The ECB recommended a number of companies who could undertake the site investigation report. The Foundation engaged in discussions with these companies, with formal appointment made in November 2020. The detailed brief for the site investigation report was shared with SE, the ECB and SCF in order to ensure it met their requirements. The report was prepared during December 2020 and was issued to SE, the ECB, SCF and RFU in December. The report provided a comprehensive assessment of the condition of the site and set out the costs of bringing the site back into a sporting use.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		January 2021-Ongoing Discussions with the Council, Sport England and Sporting Bodies A further meeting was organised in January 2021 with SE, the ECB, SCF and the RFU. The purpose of the meeting was to review the findings of the site investigation report and understand in more detail what business case could be put forward in order to deliver a viable proposition. It was explained in the meeting that no further work had been undertaken by the ECB, SCF or the RFU since the engagement in August 2020 around which local clubs might use the site. It was agreed that the findings of the site investigation report would be shared with the local clubs so they could understand the costs associated with bringing the site back into use. The Foundation has made a formal offer to sell/agree a long lease over part or all the site to SE, the ECB, SCF and RFU. This sits alongside the cost information which has been provided by the Foundation to outline the physical and ongoing operational costs associated with bringing the site back into sports use. Whilst SE asked whether the Foundation would be prepared to sell/lease the whole site, this option had been discussed at the January 2021 meeting. It was explained that no funding existed for this option. However, those discussions are ongoing to understand whether the required finances are in place to create a viable sports proposition on the site. Further engagement with SE, the RFU and ECB and SCF were undertaken in May and June 2021. A position statement was shared with the organisations and a further meeting organised. At the June 2021 meeting SE explained a number of local groups had expressed an interest although no names were provided. SE explained sensitivities prevented them from giving the names of the organisations as it may prejudice these of their current facilities. In following correspondence, the Foundation explained they were willing to enter into Non-Disclosure Agreements to allow any parties to discuss their interest in leasing or purchasing part or all of the site in seeking to fully examine whether a viable sporting use can be found. At the time of writing SE have provided a number of contacts. The Foundation are seeking to actively engage with them to establish their interest and business case for leasing or purchasing part or all of the site as part of fully investigating whether a viable sporting use can be found. The Foundation have supported the Council in the preparation of the PPS, and the activities of the Steering Group. The Foundation have entered into detailed discussions with SE, the ECB, SCF and the RFU and provided specialist reports to understand whether a viable sporting proposition could be delivered. That support continues with the last engagement with SE and the various sporting bodies.	Noted
54	United Westminster and Grey Coat Foundation	04 Mitcham			Chapter 04-Mitcham Draft Policy N4.1-Surrounding Area of Mitcham Town Centre The Foundation supports the vision for the Mitcham Neighbourhood. They believe the redevelopment of the Tamworth Lane site can play an important role in realising that vision to improve the quality and mix of homes, including affordable homes. Paragraph 4.1.9 states that Mitcham is projected to accommodate a range of new homes, with major development sites including Tamworth Lane. Paragraph 4.1.10 states that good quality housing could encourage young professionals into Mitcham bringing increased spending power which could have a knock-on effect in improving social and environmental effects. Through the delivery of new homes at Tamworth Lane and the site's integration into the wider area, an enhanced public realm and high-quality urban design can be realised. A key part of the draft policy is making more of underused spaces to encourage investment to improve public access and support greater and more diverse usage. The Tamworth Lane site has never had public access and has remained closed and unused since March 2015. The current draft site allocation would allow a meaningful use of the site through housing, potentially creating public access and facilitating investment in sports.	Noted

54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Draft Site Allocation Mi14The Foundationpropose a series ofadjustmentsto the draft site allocation text. The amendments better reflectthe existing circumstances of the site to clarify the existing lack of any public access and design considerations which sit alongside the residential use.In addition, whilst discussions ongoing with the Council, SE and the sporting bodies on the ability to create a viable sporting use, the amendments also reflect a further possible outcomeon the future use of the site for housing, with investment made in off-site sports provision within Merton. We suggest the text is amended to reflect the below:	Noted. See comments for each suggestion below.
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Site AllocationWe suggest the text is amended to reflect the below:Creation of new publicly accessible sporting facilities on part of the site enabled by residentialdevelopment.If viable sporting facilities on part of the site cannot be delivered, the Council will consider residential development on the whole site.	No further change proposed. Different representors have different views as to the viability of delivering sporting facilities on this site
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		Design and Accessibility Guidance'If the entire site cannot viably be used for sports and recreation,the council will consider the creationof publicly accessible and viable sporting or recreationfacilities on part of the site enabled byresidential development on the rest of the site.Development of the site is an opportunity to bring back an unviable site into use for viable sporting activitiesenabled by much needed new homes.If viable sporting facilities cannot be delivered on part of the site, the Council will consider a residential development on the whole site. The provision of residential development on the whole site would facilitate an agreed s.106 financial contribution to provide new or enhanced sports or recreation facilities on another site within the borough.Opportunity to masterplan the site to provide publicly accessible open space,new homes andassociated facilities necessary to support residential development (such as children's play space).Currently the existing site has nopublic access. Development proposals mustshould seek to improveprovide some public access with the surrounding area through discussions with th Council, adjacent landownersand surrounding residents between existing public areas and open spacethrough the creation of new and more directfootpaths and cyc paths links.Development proposals must protect the amenity ofneighbouring occupiers. Development proposals must mitigate parking, transport and road safety impacts on neighbouringstreets and local amenity.'	No further amendments proposed. The site allocation proposes "the creation of new publicly accessible sporting facilities enabled by residential development"
54	United Westminster and Grey Coat Foundation	04 Mitcham	Mi14		We trust that the above comments will be considered as part of the ongoing evolution of the draft Local Plan. We are also continuing the ongoing dialogue with SE, the ECB, SCF and the RFU around the creation of a viable sporting use onpart ofthe site and will update the Council accordingly.The Foundationremains committed to ensuring that its assets can be used to invest in its charitable objectives to widen educational opportunities. It believes that the Tamworth Lane site can deliver a significant public benefit to the community in Mitcham, by providing high quality housing, including affordable homes, as well as realising further investment in the Borough's sporting facilities	Noted.
54	United Westminster and Grey Coat Foundation	11 Housing	H11.1		Draft Policy H11.1The Foundation supports this policy and believes with the provision of housing at Tamworth Lanecan play an important part in delivering the objectives of policy. The table included within the draft policy examines a number of different scenarios in deliveringaffordable housing. It sets a strategic 50% target with a minimum provision of 35%. It is of course the case that viability assessment can be submitted in support of applications to determine the maximum reasonable level of affordable housing deliverable on a scheme. This approach is set out in London Plan Policy H5. We request this approach is reflected in draft policy as currently the focus on viability assessmentsis on off-site provision and payments in lieu.Draft Policy H11.2-Housing Provision The Foundation supports the aim to deliver 11,732 additional homes for the period 2021/22 to 2035/36. The Tamworth Lane site can make a significant contribution to that provision.	Noted. No further change proposed. The GLA have formally confirmed that the draft Local Plan policy is in conformity with the London Plan.
54	United Westminster and Grey Coat Foundation	11 Housing	H11.2		The Foundation supports the aim to deliver 11,732 additional homes for the period 2021/22 to 2035/36.	Support noted.
54	United Westminster and Grey Coat Foundation	12 Places and spaces in a growing borough	D12.3		Draft Policy D12.3-Ensuring high quality design for all developmentsThe Foundation supports the principles of the draft policy to create high quality developments. Part Q of the draft policy requires a minimum area of 50sqm for a garden for houses and maisonettes/duplexes. The provision of an appropriately-sized external amenity space is important for the creation of high-qualitydevelopments, but a 50sqm garden for all houses and maisonettes is likely to be hard to achieve whilst balancing the requirements for achieving housing numbers on a site.	The policy wording has been reviewed and no further action has been taken. Policy wording 12.3.q provides enough flexibility for 50sqm gardens to be challenged on 'constrained sites and higher density development where justified.' Justification text 12.3.9 highlights that challenging the 50sqm garden 'would have to be fully justified in the planning application.'
54	United Westminster and Grey Coat Foundation	15 Green and blue infrastructure	O15.2		Draft Policy O15.2-Open Space and Green Infrastructure Part C of the draft policy deals with a potential scenario where an existing open space,including playing fields, has been identified as surplus to requirements as set out in part b of the draft policy. Part C i states that 'the proposals are of a high-qualitydesign and do not harm the character, appearance or function of the open space'. As currently drafted there will likely be a conflict given that buildings are likely to be constructed on the site whenthe tests under part b will have been met. The supporting text at paragraph 15.2.7 should be used to replace the current drafting. We would suggest Part C i is changed to:'the proposals are of a high-qualitydesign and be of a scale, height and massing which is appropriate to their setting'	Officers have reviewed the policy and justification text. Policy O15.2(c) is applicable only when a proposal has met Policy O15.2(b), of which there are three options. Officers consider that it is not appropriate to remove the wording "do not harm the character, appearance or function of the open space" as this is an important assessment criteria for any development proposal that may come forward. The supporting text provides further information on the design elements to be considered in those circumstances whereby a new or improved building may come forward on open space land. Officers do not recommend any changes.
54	United Westminster and Grey Coat Foundation	15 Green and blue infrastructure	O15.5		Draft Policy O15.5-Urban Greening As currently drafted the policy is too definitive and doesn't recognise the constraints to urban greening which can impact on achieving targets. Draft policy should be amended to introduce the requirement for an assessment to be carried out and for urban greening to be maximised but reflecting the individual circumstances of a site. We would suggest the following amendment is made: a. Require major developments to incorporate urban greening through site and building design, by: i. Conducting an Urban Greening Factor (UGF) assessment in accordance with the methodology set out in the London Plan; ii. Seek to achieveing an UGF of 0.4 for developments that are predominantly residential; iii. Seek to achieveing an UGF of 0.3 for developments that are predominantly commercial.	Officers have reviewed the policy and the London Plan in line with the proposed amendments put forward in this response. The London Plan identifies that major developments should incorporate urban greening on site by meeting the target scores set out for residential and commercial developments. This is in the interim while boroughs develop their own UGF based on local evidence. Officers disagree with the proposed wording in this representation, as the current policy O15.5(a) is in line with the London Plan. It also aligns with the Council's Climate Action Plan, of which one of the key actions is to improve green spaces and urban greening throughout the borough to help mitigate the impacts of climate change such as overheating, flooding and loss of biodiversity. Officers do not recommend any changes.
55	Ursuline High School	All			Thank you for contacting schools. Much appreciated My immediate feedback is the total lack of recognition of the needs of disabled people. I live in a Raynes Park. You try pushing a wheel chair even to Holland Park from Pepys rd ... The railway station accessibility non existent .. you cannot park outside of Sainsbury's at certain times when the parking is offset... from the road. But most of all disability accessibility is huge. I would like to feedback the absence of disability accessibility in your plans especially for Raynes Park Secondly the absence of an education strategy/ careers for a growing economy and economic well being of young residents eg on apprenticeships Lastly a separate well being strategy It is not seem very dynamic and inclusive.	No further change proposed. Policy D12.2 part u refers to the management of the public realm to include access for everyone including people with disabilities. T17.6 sets the standards to provide new car parking for people with disabilities in new developments. Policy E13.4 Local employment opportunities requires major developments to advertise jobs to local people
56	Wandle Valley Forum	01C Urban Development Objectives and Vision			4.Whilst welcoming explicit recognition of the Wandle Valley in Policy O15.6we believe ithas a strategic significance which means it should be more of a centrepiece of the new Merton Local Plan.Its significance to Merton as a whole is also evidenced by the fact that the Sustainability Appraisal shows the Wandle Valley Regional Park policy impacts more sustainability objectives than any other policy in the Plan. To be sound the Local Plan should include the Wandle Valley inthe overall Spatial Vision and Strategic Objectives from which it has been dropped(other than as a location for employment)from previous iterations.The approach should also be consistent withthat taken in Wandsworth, Sutton and Croydon which share the Wandle and this should be addressed as part of the wider co-operation with neighbouring local planning authorities	No further change proposed.
56	Wandle Valley Forum	03 Colliers Wood	N3.1		9.We welcome recognition of the importance of the Wandle, the Wandle Trail, key heritage assets (e.g. Merton Priory) and the opportunities for providing better access and improved connections in the key Objectives for Colliers Wood and Policy N3.1. The Plan is virtually silent on how "improvements to the Wandle Trail" will be delivered as a result of the site allocations and other development and to meet the soundness test of effectiveness it needs to be strengthened to require new development toprovide for these strategic outcomes. Site location CW5, Priory Retail Park, provides a particular opportunity to improve connectivity across Colliers Wood and to provide much needed investment in improving the condition of Pickle Ditch (the original course of the Wandle)and Merton Priory Walls and the Policy should require their positive enhancement.We are concerned the policy approach in Colliers Wood is too enabling of tall buildings that will harm the Wandle Valley, including shadowing of important green space (such as Wandle Park) and the experience of the Wandle Trail. The Policy should require any tall buildings in the area to be designed to avoid such harm, including site allocations CW2 and CW5, as recognised in paragraph 3.1.19	The Merton Infrastructure Delivery Plan 2021 identifies improvements to the Wandle Valley Regional Park including the Wandle Trail through planning contributions and external funding. Planning contributions will be sought in accordance with the S106 tests, where appropriate. There are also discussions underway with officers from the London Borough Wandsworth in relation to the missing link of the Wandle Trail near Earlsfield. Policies relating to Tall Buildings are contained within Chapter 12 of the Local Plan. No changes recommended.
56	Wandle Valley Forum	04 Mitcham			Willow Lane Industrial Estate – support the opportunity to provide public access along the north east bank of the Wandle between Watermead Lane and Bennett's Hole Local Nature Reserve and provide a new boundary between the industrial estate and the river	No change proposed. The Wandle trail is established to the western / southern bank of the river Wandle, separate from the industrial estate. There are no proposals to introduce another trail on the same side of the river as the Willow Lane industrial estate.
56	Wandle Valley Forum	04 Mitcham	Mo3		We do not support the inclusion of Site Mo3 at Imperial Fields for housing development. This is designated as Metropolitan Open Land, Green Corridor and Open Space and residential development is clearly inappropriate. No very special circumstances are presented to support this allocation which is in major conflict with national, London, and Local Plan policies. It is also notable that the recently completed Green Infrastructure, Biodiversity and Open Space Study for the Plan's evidence base "recommends that this area is retained as part of MOL designation" and also concludes that "the whole site meets Open Space criteria" and the area of the site allocation "should be retained" as Green Corridor. This is notwithstanding the recent decision of the Mayor of London not to intervene on Merton Council's consent for a non-compliant residential development	No change proposed. Planning permission 19/P4094 for 77 homes plus contribution to sporting facilities on site Mo3 was resolved to be granted planning permission by Merton's Planning Applications Committee in August 2020, subject to the signing of a Section 106 agreement

56	Wandle Valley Forum	04 Mitcham	Mo3		11. We do not support the inclusion of Site Mo3 at Imperial Fields for housing development. This is designated as Metropolitan Open Land, Green Corridor and Open Space and residential development is clearly inappropriate. No very special circumstances are presented to support this allocation which is in major conflict with national, London, and Local Plan policies. It is also notable that the recently completed Green Infrastructure, Biodiversity and Open Space Study for the Plan's evidence base "recommends that this area is retained as part of MOL designation" and also concludes that "the whole site meets Open Space criteria" and the area of the site allocation "should be retained" as Green Corridor. This is notwithstanding the recent decision of the Mayor of London not to intervene on Merton Council's consent for a non-compliant residential development.	The wording in the site allocation has been updated to reflect the GLA decision and subsequent approval of development on this site. As a result, the Local Plan proposes to remove this portion of land from MOL. Changes have been made to the Policies Map now that the planning application has been approved.
56	Wandle Valley Forum	09 Wimbledon	W17		10. Other site specific opportunities in Merton include <input type="checkbox"/> Wi7 – Rufus Business Centre – this site allocation should explicitly address the need for any development to provide public access between Durnsford Road Recreation Ground and the Wandle Trail (through the former Haslemere Industrial estate)	The Site Allocation currently states "this site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies." There are opportunities to provide links between the Wandle Trail and Durnsford Recreation Ground through this site and officers agree that the Site Allocation should be amended to make this clear. It is proposed to add the following wording to the Site Allocation: "Proposals will be required to explore the opportunity to improve pedestrian and cycle access between the Wandle Trail and Durnsford Recreation Ground, in accordance with the active travel policies." Noted.
56	Wandle Valley Forum	15 Green and blue infrastructure			Designations 13. The continued recognition of the Wandle Valley Conservation Area is welcome. 14. We support the continued designation of significant areas of open space within the Wandle Valley to protect its open character and wildlife value, including as Metropolitan Open Land, Open Space, Green Corridor and multiple wildlife designations. 15. We support the proposed additions to Metropolitan Open Land, Open Space and Green Corridor along the Wandle which also ensures a more consistent approach, including TEP-07, TEP-09, TEP-12 and TEP-22.	
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		Policy O15.6 – Wandle Valley Regional Park 5. Policy O15.6 for the Wandle Valley is welcome and, if implemented, is significantly more effective than Policy CS5 in the current Local Plan.	Support for this policy is noted.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		7. To be sound Policy O15.7 should be strengthened by: <input type="checkbox"/> recognising in section d, the value of the existing Wandle Trail and the need to protect it and provide for new stretches as part of new development, as well as the opportunities for completing the Wandle Trail in key locations	Policy O15.6(d) currently supports the completion of the Wandle Trail. Officers agree that the wording "protect and" should be added to this policy to make it clear that there is support for protecting the existing Wandle Trail, in addition to support for completion of those sections that have not yet been finished.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> requiring development immediately adjacent to the river to provide appropriate public access, including specifying the provision of minimum 3m wide access along the river front (and supporting this in relevant site allocations) through amendments to section e.	The Wandle Trail currently provides a continuous and accessible route which enables cyclists and pedestrians to travel along the River Wandle. While further accessibility through new development is welcomed to the WWRP through Policy O15.6(e), there is currently no infrastructure deliverability evidence to require all adjacent developments to provide further public access. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> recognising the historic significance of the Wandle itself and its related weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal – a number have been removed without effective consideration of their heritage value	The heritage value of the Wandle is covered in Policy D12.5 and it is not appropriate that these are repeated. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> identifying the opportunities for environmental improvements and upgrading the industrial estates in the Wandle Valley (e.g. Willow Lane, Merton Park) which will support a virtuous circle of environmental investment and business benefit by ensuring new development contributes to strengthening the environmental quality, cultural vitality and economic health of the Valley. This in turn will attract more visitors, expand the range of customers and make Wandle Valley businesses attractive places to work	Policies on economic growth, the protection of industrial land and culture are covered in Policies EC13.1, EC13.2 and EC13.9. It is not appropriate that these are repeated. Policy O15.6(h) also encourages community celebrations that support and promote tourism. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> translating the "future opportunities for the Wandle Valley Regional Park to incorporate a large area of open space stretching from Mitcham Common and Three Kings Piece to Beddington, in the neighbouring borough of Sutton" in paragraph 15.6.15 into an enabling policy for realising the potential of the largest area of open space within the Wandle Valley Regional Park from a clear identity, better access and coherent management – this will help to ensure this aspect of the Plan is deliverable	Officers have reviewed this wording and consider that it is already covered in Policy O15.6(i). No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> identifying and protecting the Wandle Vistas at Pollards Hill, Mitcham Common, Wimbledon Park and St Marks Road car park, Mitcham and including the Wandle Vistas report prepared for Wandle Valley Regional Park Trust and Wandle Valley Forum with funding from the Living Wandle Landscape Partnership in the supporting evidence base for the Plan – this work has been recognised with the RTP's Excellence in Plan Making Practice award and the Landscape Institute's Award for Landscape Policy and Research and its omission from the evidence base and policy framework is unsound	Officers have reviewed the Wandle Vistas Guide and Technical Report and note that it provides good background information on the Wandle Valley and some useful guidance on locations within the Wandle Valley Regional Park and ideas on how to improve walking and cycling routes. It should be noted that the council's Local Plan team was not made aware of this report during its preparation and therefore has not had the opportunity to comment on the information provided. Upon review, there is some information in the Wandle Vistas report that conflicts with the Local Plan. Officers do not consider it appropriate to refer to this document in the Local Plan policies or to have it listed as part of the Local Plan evidence base, as this would result in some conflicting information between the Local Plan and the Wandle Vistas report. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> translating the commitment to "support the relocation of existing power lines, pylons and other visually intrusive servicing as part of planning agreements in relation to new developments where it is technically, practically, environmentally, and economically viable" in paragraph 15.6.23 into the policy so it carries appropriate weight in planning decisions and is deliverable	Significant changes to utilities infrastructure such as power lines and pylons is beyond the scope of the Local Plan where this has not been identified as necessary by a utility provider. Details of any such changes would need to be agreed between landowners and utilities providers and brought forward through a relevant planning application. It is not considered appropriate to require this as policy. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> addressing the need for any investment in the Wandle Trail to respect the character of the river's environs and be designed to prioritise use by pedestrians	The Wandle Trail is addressed in Policy O15.6, which sets out that it is an important route for both pedestrians and cyclists. It would not be appropriate to specifically reference pedestrian priority as the Local Plan is supportive of both pedestrian and cycling as active travel methods. Paragraph 15.6.10 already includes a reference to investment needed to respect the character of the river's environs. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		8. This section of the Plan should also support delivery of the Wandle Valley Catchment Plan. This would be consistent with national planning policy's support for Plans to "take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale" (NPPF, para 175)	Policy O15.6(b) provides support for the protection and enhancement of the River Wandle, including its green and blue infrastructure, biodiversity and wildlife corridors. Officers consider that this policy is in accordance with NPPF 175. Policy O15.3 also sets out the commitment to protecting and enhancing the natural environment, including rivers. No changes recommended.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		<input type="checkbox"/> Willow Lane Industrial Estate – support the opportunity to provide public access along the north east bank of the Wandle between Watermead Lane and Bennett's Hole Local Nature Reserve and provide a new boundary between the industrial estate and the river	Officers have reviewed the policy and consider that it already includes wording to seek improvements to walking and cycling accessibility. For three waste management sites on the north bank of the River Wandle, in the Willow Land Industrial Estate, the following text is included in the draft South London Waste Plan as a matter to consider if the safeguarded waste site is to be developed: "Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development". The Wandle Trail currently runs along the southern side of the River Wandle at this location and it has not been identified as part of our evidence base that an extension is required along the northern part of the river. Officers do not recommend further changes.
56	Wandle Valley Forum	15 Green and blue infrastructure	O15.6		16. Paragraphs 15.6.11 and 15.6.12 are largely a repeat of the preceding two paragraphs and should be deleted.	Officers have reviewed and agree that these two paragraphs should be deleted due to repetition.
56	Wandle Valley Forum	16 Sustainable Travel			12. We strongly support Projects TN11 and TN12 where they provide for an improved walking and cycling network supporting the Wandle Trail. Wandle Trail investment should prioritise its use by pedestrians drawing on the Canal and River Trust's Towpath Code. The Plan should clarify that this includes the projects recognised in earlier iterations as Projects TN22 and TN23 which would have a transformative impact on the Wandle Trail and connectivity near Earlsfield, including closing the longstanding gap under the railway bridge. This is recognised in paragraph 15.6.10 but not as a specific project.	Agreed. Schemes TN11 and 12 in Table 16.1 amended to provide additional wording "and including the "missing link" along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth)."

56	Wandle Valley Forum	16 Travel	T16.5	Table 16.1 indicative list of transport schemes	12. We strongly support Projects TN11 and TN12 where they provide for an improved walking and cycling network supporting the Wandle Trail. Wandle Trail investment should prioritise its use by pedestrians drawing on the Canal and River Trust's Towpath Code. The Plan should clarify that this includes the projects recognised in earlier iterations as Projects TN22 and TN23 which would have a transformative impact on the Wandle Trail and connectivity near Earlsfield, including closing the longstanding gap under the railway bridge. This is recognised in paragraph 15.6.10 but not as a specific project.	Agreed. Amendments made to TN11 "borough wide walking network" to say Improvements to the walking network including routes, lighting and crossing facilities including the "missing link" along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth). And to TN12 "borough wide cycling network" Development of a strategic network of cycle routes, including new feeder routes to the Cycle Superhighway and including the "missing link" along the Wandle Trail near Earlsfield (Wimbledon Park to Wandsworth).
56	Wandle Valley Forum	Policies Map			6. To be soundly justified the boundary of the Wandle Valley Regional Park needs to be more effectively expressed and evidenced. We welcome recognition of the Wandle Valley Regional Park as established in the All London Green Grid, although we believe this should include the whole of Wimbledon Park. The Local Plan should be clear that the Wandle Valley includes the catchment of Norbury Brook/River Graveney. The map included with the Local Plan (Green Infrastructure – WVRP LR, below left) showing its location and that of the 400m buffer is not consistent with the All London Green Grid definition contrary to the assertion in paragraph 15.6.2. It erroneously limits definition of the Wandle Valley Regional Park largely to its adjacent green spaces rather than the continuous hatched area in the All London Green Grid Supplementary Planning Guidance (below right). As the Plan notes, the Wandle Valley is viewed "not just as a collection of green spaces, but as an interconnected system that can benefit communities living and working in the Wandle Valley" and so is more than the combination of the individual green spaces.	The proposed Wandle Valley Regional Park boundary remains consistent with the boundary shown in the current 2014 Sites and Policies Plan. This was published as part of the Stage 2a and Stage 3 consultation under Green Infrastructure Policy Maps. With reference to the key on page 105 of the All London Green Grid, the hatched area mentioned in the response refers to "Regional Park Opportunities" and is not the boundary of the park itself. Wimbledon Park is not shown as part of the Wandle Valley Regional Park as it does not fall within this area. This is consistent with the All London Green Grid. No changes proposed by officers.
56	Wandle Valley Forum	Policies Map	O15.6		□ identifying the route of the Wandle Trail (including the variations) on the Policies Map	Agreed that the Wandle Trail should be shown on the Policies Map. This has been added as one of the Transport maps as it forms a strategically important part of the boroughs cycling and walking network, playing a vital role in enabling active travel choices.
56	Wandle Valley Forum	Policies Map	Policies Map		13. The continued recognition of the Wandle Valley Conservation Area is welcome.	Noted
56	Wandle Valley Forum	Policies Map	Policies Map		14. We support the continued designation of significant areas of open space within the Wandle Valley to protect its open character and wildlife value, including as Metropolitan Open Land, Open Space, Green Corridor and multiple wildlife designation.	Noted
56	Wandle Valley Forum	Policies Map	Policies Map		15. We support the proposed additions to Metropolitan Open Land, Open Space and Green Corridor along the Wandle which also ensures a more consistent approach, including TEP-07, TEP-09, TEP-12 and TEP-22	Noted
56	Wandle Valley Forum				1. Wandle Valley Forum provides support and an independent voice for over 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. Many of our supporters are based in Merton. We lead the Steering Group co-ordinating plans to close the gap in the Wandle Trail under the railway line near Earlsfield (Project TN23)	Noted
56	Wandle Valley Forum				2. Merton includes an important part of the Wandle Valley Regional Park and a significant length of the River Wandle and its major tributary, the River Graveney. The Wandle Valley is a major strategic environmental and heritage asset for the Borough and the site of major industrial estates and much employment. The network of Wandle-related open spaces and the Wandle Trail are especially important for the quality of life in Merton and provide an economic opportunity drawing on the area's environmental quality. It is no accident that the Merton Council logo is inspired by the heritage of the Wandle Valley (waterwheel) and the river Wandle (water).	Noted
56	Wandle Valley Forum				3. We have established our priorities for the Wandle Valley in the Wandle Valley Forum Charter. This is grounded in the views of community groups, voluntary organisations and local businesses that support us. It sets out a number of issues to be addressed through development plans in the Wandle Valley, including Merton's Local Plan. We have contributed to previous iterations of the Local Plan and acknowledge some changes have been made. Nevertheless, for the purposes of the forthcoming Examination we conclude that the Plan is unsound as it is not robustly justified and will not be effective in being deliverable over the plan period.	Noted - refer to responses to comments made by Wandle Valley Forum in other rows.
57	Wandle Way Limited	Site allocation	Wi7 Rufus Business Centre		In February 2021 representations were submitted in response to the New Local Plan Consultation February 2021 (Stage 2a) on behalf of Wandle Way Limited, the owners of Rufus Business Centre, Ravensbury Terrace, Wimbledon Park, SW18 4RL, which is the subject of a proposed site allocation (Site Wi7) for a mixed-use development consisting of employment (business and residential uses). On behalf of Wandle Way Limited, I can confirm that we are fully supportive of the proposed site allocation within the Stage 3 New Local Plan Publication for a mixed-use development consisting of employment and residential uses with an indicative capacity for 90-106 new homes. The site is currently the subject of a planning application (21/P1780) for the erection of new buildings at the site comprising 96 residential units and 880 square metres of commercial floorspace, demonstrating that the site can be appropriately developed in accordance with the parameters of the draft allocation. It is anticipated that a decision on this application could be forthcoming before the end of 2021. I would be grateful if this email could please be read alongside previous comments made in response to earlier iterations of the Local Plan that have been submitted on behalf of Wandle Way Ltd	Additional modification for clarity and factual accuracy and consistency with other similar sites Site description (last line) <u>in May 2020 a planning application (reference 21/P1780) was submitted for the redevelopment of the site to provide 96 homes and 880 square metres of commercial floorspace.</u> <u>Also the deletion: "Haslemere industrial estate"</u>
58	Wimbledon Community Association	09 Wimbledon	Wi9		I am writing on behalf of the Wimbledon Community Association (WCA) in relation to the Local Plan and in particular site Wi9 (28 St Georges Road SW19 4DP). Prior to 2013 the site was previously used as a community centre, which was the home of the WCA for almost 60 years until it became dilapidated. When the WCA departed the building its one third interest was sold back to the Council (who owned the other two thirds). Shortly after the centre was demolished by the Council and it was anticipated that replacement facilities would be built either on the site or elsewhere within the central Wimbledon area. Whilst the WCA welcomes the wider community use of venues such as Wimbledon Library, we believe there is a need for additional community space which will provide facilities suitable for events to accommodate 150-300 people (as was provided in the old community centre hall) as well as other community space. The WCA has invested the money from the sale of our interest on the original site to the Council, the dividend for which is being used to support Wimblecomm. We would welcome the opportunity to discuss with the Council and other interested parties how site Wi9 might be redeveloped to support replacement community facilities (in line with the current site allocation) or reprovided elsewhere within the nearby vicinity	No change proposed. The site allocation wW9 is for "a suitable mix of town centre type uses such as community use, retail, financial and professional services, offices, hotel and residential"
59	Wimbledon East Hillside Residents Association (WEHRA)	01B Good Growth		19	CROSSRAIL2 - THE BUBBLE HAS BURST Despite central government having pulled the plug on the CR2 programme, Merton's draft local plan still lists as their Vision and Strategic Direction, Spatial vision 1.26, and I quote, "Crossrail2 is still under construction, nearing the end, and residents, community groups, civic societies, Love Wimbledon, businesses, the council and CR2 has worked together on a plan for the future of over-station development" There should be no attention given in the new Local Plan for big, ambitious planning and development in Wimbledon town centre in expectation of CR2. All efforts must focus on this Climate Emergency, and the Pandemic fallout (increased working from home; dramatic changes in office space requirements, reduction in commuting etc). Why do dreams for a new Crossrail2 hub persist within the 'Wimbledon section'. Your authors cling to a fantasy that CR2 will still come during the life of this Local Plan. Meanwhile, pension funds and investors generally are selling out of Wimbledon, as they know CR2 isn't happening.	Agreed. Minor mod proposed to remove the reference to Crossrail in the introductory chapters.

59	Wimbledon East Hillside Residents Association (WEHRA)	01B Good Growth			<p>1. CLIMATE EMERGENCY</p> <p>Look at an example from Chapter 01B, Good Growth Strategies, where Merton describe their idea of 'good growth' as 'strategy', conveying no urgency. Worryingly, there is no requirement to actually achieve any measurable success. An example is Merton's text is excerpted here: "... by moving towards a net-zero carbon city by 2050 and adapting to the impacts of climate change" (highlights added).</p> <p>Get on the bandwagon and address the Climate Emergency head on. Wimbledon specifically – the jewel in Merton's crown – should be the lead area, with an aim to be carbon-neutral by 2030. The rest of the borough following Wimbledon's lead, should become entirely carbon-neutral by 2050 (This is an example of the precise language that is required, not more convoluted text within which anyone can still do anything they want, without recourse.)</p> <p>For starters, simple, immediate action toward zero carbon must become the new Merton Climate Emergency Rules, the first being, that No building - commercial, residential or other - may be demolished without an extremely convincing case. Given 95% of existing buildings will be intact in 2050, why narrow your ambitions, and focus on the 5% on development sites of un-sustainably tall new office blocks? Focus on the 95%. Demand 'renovation/regeneration' of existing stock. Merton leadership/PAC appear addicted to an old-fashioned 'demolition/over-development' model. We can no longer haul away thousands of HGV-loads of brick/concrete rubble to landfill, and call it 'good growth!' (Any LETI-educated person will know the carbon footprint of all that rubble to landfill NEGATES any 'carbon neutrality' of the new building's during its lifespan.)</p> <p>Requirements for both new builds and regeneration/renovation of existing buildings must include a basement moratorium, 'insulating the box', reduced glazing to cut heat loss & solar gain, rainwater retention, free-draining soil areas with seating/active frontage, energy-efficient heating/cooling system, rooftop biodiversity (bat/swift boxes, solar panels etc), all following guidelines from LETI (London Energy Transformation Initiative). The time for action is now.</p> <p>With such a secure asset as Wimbledon (the place, the Brand), Merton planners must be much more confident, be brave. Merton must demand that any investor doing business in Wimbledon from now on will need to invest EVEN MORE here, to ensure delivery of zero carbon projects starting today, and by 2030.</p>	<p>Noted. No change proposed.</p> <p>Chapter 2, Climate Change, of this Local Plan sites the London Energy Transformation Initiative (LETI) as a source of good practice and a justification for planning policies. For example Policy CC2.3 minimising energy use para 2.3.13 Merton Council will therefore require all new residential development to achieve at least the 'interim' FEES until the end of 2022 and at least the 'full' FEES from the start of 2023. In line with the recommendations from LETI and the CCC, Merton Council will also require all new build residential and non-residential development to achieve a space heating demand of 15kWh/m2/yr or less by 2025. "</p> <p>Merton's Climate Strategy and Action Plan 2020 https://www.merton.gov.uk/assets/Documents/Draft%20Climate%20Strategy%20and%20Action%20Plan%20-%20Council%20V2.pdf is also part of the evidence for this Local Plan and sets the council wide targets by 2050. The evidence https://www.merton.gov.uk/assets/Documents/Merton_Support-Climate-Action_v3.1.pdf supporting the Climate Strategy and Action Plan demonstrates that 60% of Merton's carbon emissions come from the energy use in existing homes and other buildings. Aside from where this affects the outside facades or heritage assets, homeowners and property owners are able to undertake decarbonisation outside the planning process.</p>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon			<p>Any 'improvement' to Wimbledon town centre must accept that the potential for the town comes from the HERITAGE/CHARACTER of Wimbledon Village. In Wimbledon: Policy 9.1, para 1, you describe Wimbledon (not the town on its own – but grown from the Village. The link to the Village, and to the wider heritage and renown of Wimbledon Village must be enhanced, not severed</p>	Noted.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	page 264	<p>Chapter 9, P264 Wimbledon "A vibrant town centre" (sic) Merton continues to demonstrate a lack of appreciation for the asset that is Brand Wimbledon. There is mention of 'overarching vision' and 'character' but the word missing is HERITAGE. It is the Heritage and Character of Wimbledon, drawn from a long, complex history back to the stone ages, that draws millions of people to Wimbledon, and at the core, the attraction stems from the Village, the Common and the tennis. The town must improve as an integral part of this Asset, not try to establish a separate identity. The past ten years of BID have shown there is still 'no heart' in the town, because the BID doesn't understand the need to draw connections to the heritage/character of the Village and especially the essence of Brand Wimbledon. For example, why aren't all the Conservation Area Victorian retail facades being restored to their former glory, as done across from Centre Court?! Neighbourhood CIL funds are perfect for such regeneration of the rich heritage/character that people flock to Wimbledon to see. (NB: on The Broadway, from McDonalds to Flights Direct, these lovely Victorian facades are in urgent need of regeneration, and CIL should be used for enduring projects that we all benefit from; similarly on the west side of Wimbledon Hill Road, a dozen facades should be restored.)</p>	<p>Noted. No change proposed.</p> <p>The third objective states "Conserving character - Maintain the unique character and built form of the areas surrounding the Town Centre by supporting development of high quality that is commensurate with the scale". Local character includes consideration of heritage.</p>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	a	<p>Wimbledon Policy 9.1 Item a) There is no mention of the existing primary stakeholders i.e. local residents. Homeowners' outnumber Business stakeholder value by 15 to 1. It is unacceptable that FutureMerton discredit the importance of Wimbledon residents to the success of any future for Wimbledon (village, town, chase, park, south or west). For example, Wimbledon homeowners repeatedly have told FutureMerton of the need for affordable rental accommodation for essential workers in Wimbledon (nurses, carers, teachers, Tas, police and emergency responders). Where is the commitment to develop local (i.e. 'within walking distance') housing for these people? The luxury flats beside the new YMCA are a mistake: a block of 'luxury flats' right next to 110 vulnerable men? As WEHRA and others advised, 'care workers' living right next door would have been a truly sustainable solution. Now coming into focus is the redevelopment of Centre Court; that provides a similar opportunity; Future Merton should amend the site proposals to include truly affordable rental accommodation for lowly paid but highly valuable local staff.</p>	<p>No change proposed Policy 09.1 (a) includes residents as people living in the area, stating "Promoting Wimbledon as south west London's premier location for business, leisure, living and culture: an exemplar for good quality and sustainable placemaking."</p>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	e	<p>Item e) You talk about making Wimbledon town 'green'. In ten years, BID LoveWimbledon has allowed nearly every tree to die or become so starved of water and care, that they will not survive another year or so. The town is barren, filthy and unwelcoming. The first thing really needed in the town is a properly, democratically represented business association, that allows both chain and independent businesses equal say in how to improve the town. (Just look at the success in Wimbledon Village and Leopold Road, as examples of successful, locally managed business precincts.</p>	Noted.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	g	<p>Item g) "Promoting a vibrant day, evening and night-time economy through a mix of commercial and community uses." This concept is not sustainable. Wimbledon town homeowners chose this area because it is a traditional community of primarily family homes, filled with young families with infants and school-aged children. Wimbledon, as it stands, is a dense, residential, sustainable community. It operates as an independent estate, and there are requirements for a good night's sleep that must be respected.</p> <p>Continued pushing from LoveWimbledon and/or FutureMerton that a night-time economy must be permitted is poorly construed. For starters, Wimbledon people are in the main a professional lot, many dual income households, and they all need to SLEEP AT NIGHT.</p> <p>Since the Licensing Act, 2003, many Application Hearings have dealt thoroughly with the problems associated with licensing activity after midnight. Indeed, nearly all the serious crime, ASB, noise nuisance and vandalism occur because of the very few venues that take advantage of 'later night-time liberty'. Illegal drugs are in abundance in the town, alcohol flows generously in both venues and from off licences in WTC after midnight. The 'real economy' is visible any given morning: vomit on the footpaths, urine and faecal matter in dark corners (even beside the Library entrance), litter and broken bottles, food scraps tossed, foraged by pigeons and rats. (This might be acceptable in Camden, but it is not here in Wimbledon town, village, indeed anywhere in the Borough. Please remove the suggestion that any night-time economy be encouraged in Wimbledon in the future. Local residents and arriving workers suffer a loss of amenity; they have to pay the price by having litter on their streets, bottles and butts tossed in our front gardens and even drunks sleeping in our alleys. You are squandering our council tax revenue on catering to visiting drunks and druggies. (It has been said that Croydon people come to Wimbledon to fight, leave blood on our streets, then get on the tram back home.)</p>	<p>Noted. No change proposed.</p> <p>Wimbledon is Merton's only major town centre and includes a variety of cinemas, theatres, bars and restaurants that serve the evening and night time economy. Entertainment and culture is part of Wimbledon's character, helps provide jobs and is a draw to the town centre, supporting other services. Separate to the planning system, Wimbledon town centre is part of a selective licensing zone to help prevent an over-concentration of licensed premises.</p>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	i	<p>Item i) Merton must ensure the increasing number and size of HGVs using our roads is reduced dramatically in the coming few years. Wimbledon Hill Road and the Broadway are the primary commercial areas for shopping and offices. Yet these roads are being compromised due to the continued and increasing level of HGVs tearing down the roads, ripping up tarmac and crushing mains water pipes and sewers. Even Richard Caring has noted the increasing number of HGVs tearing around the corner just outside his illustrious Ivy Cafe. One HGV a minute now crosses major junctions from Weir Rd, Alexandra Rd and Wimbledon Hill Road! This is ruining not just the town, but the Village as well - reducing road safety, polluting our already dirty air and tearing up the tarmac and water/sewer pipes in their wake.</p>	<p>Noted. No change proposed.</p> <p>The A219 road (including Wimbledon Hill and Wimbledon Broadway) will have some HGV traffic for deliveries and servicing. Chapter 16 Transport and Urban Mobility contains policies on managing traffic from the construction and whole life of development.</p>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	k and l	<p>Item k/l) Again, no mention of Heritage/Character of Wimbledon. There are many schools here, this is a major draw for residents to Wimbledon. And there exists a wonderful, mature green canopy, yet Merton appear bent reducing the canopy, not increasing it. The primary cause of deterioration of these assets are because of Planning decisions being made in the past five years or so, waving through unsustainable, overly-dense schemes in Wimbledon town area.</p>	<p>Noted. No change proposed.</p> <p>Policy 09 Wimbledon refers to the unique character, conservation area protection, environmental improvements, support for increased walking and cycling and specifically refers to heritage assets in point (o) <u>Surrounding neighbourhoods of Wimbledon</u> k. Maintaining the unique character and built form character of Wimbledon Village, supporting development that is commensurate with the scale and the significant quality of this Local Centre. l. Supporting development that attract greater footfall and boost the visitor experience to Wimbledon Village and Arthur Road Local Centres;</p>

59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	q	Item q) Tennis et al: Wimbledon is not only the finest tournament in the world; the event was founded here. Tennis is a metaphor for a well-lived life in Wimbledon. is a major draw for residents, businesses, tourists and curious visitors. In the game of tennis, there are clear, strict and fair rules, and mutual respect for all. Likewise, a great respect here for wellbeing of its residents: for knowledge/education and lifelong learning, attention to detail, a love of nature, wildlife, green-ness, tidy gardens, large trees with generous, healthy canopies, fresh air. Merton needs to demonstrate appreciation for the Assets that are Brand Wimbledon. Yet FutureMerton is degrading the area with poorly conceived, unsustainable over-development, particularly in the town areas adjoining residential areas.	Noted. No change proposed.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	9.1.2	Policy 9.1.2 "Station and Railway" Merton describes 'a world class station, a sense of arrival.' Why? What about: Form follows Function, especially for a busy commuter hub, working with a small footprint. Wimbledon is not a showy, 'extrovert' place like Essex. Such architecture is expensive, and belongs in Dubai; it is entirely inappropriate for Wimbledon. Please amend this policy accordingly.	Noted. No change proposed. 9.1.2 states "The station and railway - There are long term ambitions to overcome the severance caused by the railway tracks, therefore creating a more accessible and connected town centre. Consultees highlighted the need to reduce traffic dominance throughout the town centre and to humanise the public realm. A world class station that has a sense of arrival with access to rail, underground, tram and buses was desired." The desire emanates from people's responses to public consultation on the FutureWimbledon SPD.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	9.1.12	Policy 9.1.12 "CR2 will be a key driver of change in Wimbledon." Well, CR2 is not happening. Pension Funds/investors are now selling up and leaving Wimbledon, looking for better value and return on their investment. FutureMerton needs to respect that encouragement to build tall, pricey offices adjoining homes is not a sustainable use of land here.	Noted. No change proposed. <i>It is clear from para 9.1.2 and 9.1.3 that Crossrail2 will take place outside the lifetime of this Local Plan. 9.1.12 In the future, Crossrail 2 will be a key driver of change in Wimbledon. In particular, it will open up new opportunities for creating new public space around the station and improving links across the railway lines, helping to create more space for cycling and walking and alleviating congestion currently on and around Wimbledon Bridge. 9.1.13. However, at this stage it is likely that Crossrail 2 will not be completed prior to 2040, outside the lifetime of this Local Plan " etc</i>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	9.1.20	Policy 9.1.20: "WTC accommodates the majority of office development in the borough, presenting as an attractive location for investment in SW London," with two areas identified, the Bridge and Worple Rd. There is a great flaw in this proposal. Worple Road adjoins a densely populated, sustainable residential community, with many excellent schools, primaries, nurseries, care centres and doctor surgeries. These are all full to capacity, and any development of existing structures must be cautiously considered. The roads are always blocked during the daytime, there are only tiny footpaths on all these roads, the hard infrastructure is old and not capable of including any increase in density without negative consequences for existing businesses and homeowners, not to mention increased challenges from climate change. Flooding, for example, has become a critical issue, and Merton should put in place a basement moratorium until at least 2030, in order to get a handle on flooding mitigation BEFORE allowing more, taller, more energy-demanding buildings in these areas. There isn't enough mains pressure to go around as is! Continuing to build/densify these areas will mean any impact on existing properties/businesses will be negative.	Noted. No change proposed. Wimbledon is Merton's only major town centre and is recognised in successive Local Plans and London Plans as one of the few outer London town centres that are attractive to the office market. There are existing offices around Worple Road and Wimbledon Bridge as referred to in 9.1.20 which states in full <i>Wimbledon town centre accommodates the majority of major office development in the borough, presenting as an attractive location for investment in south-west London. There are two distinct clusters of office development around Wimbledon Bridge and Worple Road, and a developing cluster east of the station along The Broadway. We will continue to support the development or refurbishment of major offices in these locations, including for flexible working. Due to its location with easy access by public transport, strong, recognisable name and attractive surroundings for homes, schools, recreation and leisure, Wimbledon is expected to be a more resilient location for offices than central London should the trend be for greater flexible working.</i>
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	9.1.21	Policy 9.1.21: Hotels encouraged? Wimbledon is a premium area, and premium hotels are still lacking here. We now have a surfeit of cheap hotels and the cheap retail and take-aways that follow. WTC needs a more upmarket clientele to match existing stakeholders: upmarket residents and upmarket retail/leisure/commercial businesses. That is how a sustainable town grows/evolves.	Noted. No change proposed. As the borough's only major town centre and one of the few outer London town centre tourist destinations, hotels are supported in Wimbledon.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	9.1.23	Policy 9.1.23 "...Competitive advantage of night-time economy offers..." Again, FutureMerton/LW have not calculated costs vs benefits of a night-time economy (ie: alcohol after midnight). The night-time economy in Wimbledon town and Wimbledon village have been and remain a DIS-ECONOMY. Yet Merton has never shared any calculation of the full cost of police/ambulance staff, vehicles, arrests doctor/nurse/ER/hospitalisation costs, street sweeping, plate glass windows/doors (smashed ONE PER WEEK in WTC), the default filthy streets and footpaths, vomit/urine that nobody ever really washes away. Merton Leadership must insist on a full and transparent review of financial/social costs of the existing night-time economy in WTC. They will find that is most certainly a diseconomy here and throughout the borough. Please amend this policy accordingly.	Noted. No change proposed.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1	9.1.25	Policy 9.1.25: The Village "...has few grocery stores but several high end 'chic' retailers..." Again, FutureMerton doesn't get Brand Wimbledon. Please amend this section to reflect that here are four new grocery stores in Wimbledon Village, already very successful, adding further daily footfall to the thriving Conservation Area Shopping Parade.	Noted. No change proposed. Data based on Merton's annual shopping survey, which demonstrates there are more higher end retailers and fewer grocery stores in Wimbledon Village in proportion to other local centres
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	Wi10		Prospect House: This is a tall building, four storeys, owned by Henderson UK. It should be retained, renovated to a zero-carbon status to provide an EXEMPLAR in how to regenerate existing brick structures for future generations. Perhaps this could be an alternate site for affordable rental for key employees (see above)	Noted. No change proposed.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	Wi16		Wi16: Centre Court, owner Romulus. Again, serious problems within intensification on this site. A good alternate for affordable rental for key employees. Any proposals must include robust solutions to parking/road congestion, flooding, Thames Water deficiency, narrow footpaths, deficient in nature/soil/play areas, plus schools full to bursting in this area, and any housing proposals would need to fund a new school	Noted. No change proposed.
59	Wimbledon East Hillside Residents Association (WEHRA)	09 Wimbledon	N9.1		These are our views. I trust this letter gives FutureMerton an indication of what we consider to be a few of the conflicts that exist within the Stage 3 Local Plan. In our view this draft needs to be set aside, and a short, concise draft must be prepared as a matter of urgency. Clear direction is needed now more than ever, and the clock is ticking.	Noted.
59	Wimbledon East Hillside Residents Association (WEHRA)	All			SUMMARY On behalf of Wimbledon East Hillside Residents' Association, I wish to share our disappointment with FutureMerton's Stage 3 Local Plan. Wimbledon is often described as 'the beating heart' of Merton. We consider that the current proposals will not sustain or grow the town centre; rather it will lead to over-development resulting in ongoing decline of its perceived value to investors, businesses and residents as it becomes a less safe and attractive location to live, work and visit.	
59	Wimbledon East Hillside Residents Association (WEHRA)	All			GENERAL COMMENTS FutureMerton describes their draft plan quite generically: The plan is designed to help guide how the borough develops over time and create a vision that enables the council to successfully and responsibly manage growth, while always ensuring the best interests of the borough, its residents and businesses. Merton is rich in assets and the opportunities they inevitably create. It is a place ripe for sustained economic success, and the New Local Plan will mean that for years to come there will be a sound and consistent approach to ensuring a bright future for the borough and all who live and work here. It would appear that despite all the changes going on in the world, FutureMerton is forging ahead with another convoluted document, incapable of guiding us safely through the next 20 years. It is written as if the pandemic is over, no social changes are happening, and no environmental challenges have emerged in the past few years. This draft needs to be replaced with a concise, actionable Plan, written by someone who has both knowledge and vision; someone who can write in crisp, simple sentences, without cliché. We require a robust Plan that can navigate Merton through these dangerously challenging times.	
59	Wimbledon East Hillside Residents Association (WEHRA)	All			There are three major challenges in Merton and the wider world which should be centre stage in the proposed Local Plan to guide us through to 2040. These are: 1. CLIMATE EMERGENCY There is a Climate Emergency – indeed, Merton Council has declared one. So most attention should focus on addressing this critical environmental challenge. Air pollution is a very serious problem in Merton, flash flooding threatens all our local communities, and our significant tree canopy is under threat from both developers and Merton officers. The planning department contribution appears conflicted, unable to develop, let alone enforce a zero carbon built environment within the next few years.	Noted

59	Wimbledon East Hillside Residents Association (WEHRA)	All			2. CROSSRAIL2 - The Bubble has Burst Crossrail2 is not going to be built in Wimbledon before 2040, indeed, quite possibly never. Yet the Stage 3 Plan still envisages a skyline of tall new office buildings which will be irrelevant, many at three times the height of the existing street scene.	Noted
59	Wimbledon East Hillside Residents Association (WEHRA)	All			3. COVID-19 PANDEMIC The Covid-19 pandemic is not over; it may never really go away, it will continue to impact the way we live, work, and socialise for many years to come. It will have/is already having a fundamental impact on our built environment	Noted
59	Wimbledon East Hillside Residents Association (WEHRA)	all			3. COVID-19 PANDEMIC Major social changes have come about, not least the need for people to be kept safe, and to make every effort to reduce transmission of this unusual virus. Working from home, social distancing, not travelling on public transport, and the resultant changes to former 'plans' to dramatically densify Wimbledon town centre area. Localism is replacing Globalism. All these plans must be set aside and re-drafted, to the 'new world order' coming into view.	Noted.
59	Wimbledon East Hillside Residents Association (WEHRA)	Site Allocations	Site Allocations		Wimbledon homeowners repeatedly have told FutureMerton of the need for affordable rental accommodation for essential workers in Wimbledon (nurses, carers, teachers, Tas, police and emergency responders). Where is the commitment to develop local (i.e: 'within walking distance') housing for these people? Future Merton should amend the site proposals to include truly affordable rental accommodation for lowly paid but highly valuable local staff.	No further change proposed. The draft Local Plan should be read as a whole and includes policies which effectively address the issues raised including policies H11.1 (Housing Choice) and H11.2 (Housing Provision). It is considered unnecessary to explicitly state affordable housing rental accommodation as part of the preferred uses for the site proposals which include a housing use as policy H11.1 requires all housing development proposals to meet the affordable housing provision requirements.
60	Wimbledon Park Residents Association	01A Introduction			Specific comments on the Draft Local Plan Strategies and Policies 01A The Introduction states in 1.1.5 that the "Local Plan must be read as a whole document" We have considered the whole document and focused our comments below on the inconsistent policies related to Site Allocation Wi3 in our submission to ensure the protection of this Historic Heritage Site through National Planning Policy and the London Plan	Noted
60	Wimbledon Park Residents Association	01B Good Growth			01B Under Good Growth Strategy it is stated that "the Mayor will be developing a London wide Heritage Strategy together with Historic England and other partners, support the capital's heritage and the delivery of heritage-led growth. Merton Council supports this approach and will work with local communities, the Mayor and partners to protect and enhance our rich heritage". Policies need to be implementable, in particular when relating to sites such as Wi3 which are not even included in Merton's Spatial Strategy Opportunity Areas Plan for development. We question if this policy could be referenced in the section relevant to Site Allocation Wi3	Noted.
60	Wimbledon Park Residents Association	01C Urban Development Objectives and Vision			01C Under Urban Development Objectives and Vision we note in Strategic Objective 2: Supporting Resilience, the following pledge (d): "Protecting and improving the Borough's parks and ensuring public access to formerly private open spaces. Improving access to nature and leisure facilities, including opportunities for sport, physical activities, play and relaxation to help boost people's physical and mental health. We would urge the Inspector to reference this policy in the section relevant to Site Allocation Wi3	Noted. No change proposed. The Local Plan is read as a whole.
60	Wimbledon Park Residents Association	09 Wimbledon			Submission of Wimbledon Park Residents' Association These comments are made on behalf of Wimbledon Park Residents' Association (WPRRA) which has been established for many years and whose members span the entire Ward of Wimbledon Park, approximately 12,000 residents and 4,500 households. WPRRA take an interest in a wide range of matters affecting the lives of residents and were, more recently, instrumental in the establishment of Wimbledon Park Hall and Café and the Wimbledon Park Community Trust, the charitable trust which runs it. WPRRA were also co founders of the Friends of Wimbledon Park and act as the Friends of Durnsford Recreation Ground. WPRRA are supported by residents with a wide range of professional qualifications and experience relevant to these matters.	Noted.
60	Wimbledon Park Residents Association	09 Wimbledon		Page 276 and page 282	Summary WPRRA submit that it is wholly inappropriate for AELTC's landholding East of Church Road, in Wimbledon Park, to be within the site allocation Wi3. Please note that the maps supplied with this draft of the Local Plan appear to be confusing: on page 276 the Park is omitted from Wi3, whereas on page 282 it is included which is also suggested by the accompanying text. It is not clear whether the later entries have not caught up with the change in the overall map. Two numbered entries (Wi4 and Wi14) appear to have been withdrawn. This submission assumes that the Park is to be included in Wi3 and argues that it should be excluded	Agree with comment on the map. MINOR MOD PROPOSED TO UPDATE THE ILLUSTRATIVE MAP ON PAGE 276 TO MAKE IT ACCURATE WITH THE CURRENT SITE ALLOCATIONS boundaries. ALSO TO ADD A TITLE to map on page 276.
60	Wimbledon Park Residents Association	09 Wimbledon	Wi3		[summary contd] The justifications on page 275 do not support any development to the East of Church Road. Paragraph 9.1.34 supports only AELTC's activities to the West of Church Road. The support of the London Borough of Merton in paragraph 9.1.35 is inappropriate: there are, in fact, no "AELTC facilities" on the East side. When not used as a Golf Course, that side is used for car parking only for the fortnight of the tennis championships. It is not entirely clear how the Park has arrived on the Site Allocation list, whether a landowner wished to promote their interests in it, or whether it is seen by public bodies as suitable for inclusion. In either case, it is not an appropriate entry in this list since the Park is heavily protected. AELTC have made an extensive and challenging planning application (21/P2900) for development at the Park and Lake, trusting, according to their Planning Statement, that the change to the Local Plan will go through in order to support it. However, the application is yet to be judged against the significant policies which it offends. It would be quite wrong for the Park to be designated for development in the Local Plan before the substantial harm (or benefits) of any application can be objectively assessed. There are key Policy, Heritage at Risk, and Conflict of Interest issues which support this submission.	Noted - matters further considered in full elsewhere as this section summarises the WPRRA response
60	Wimbledon Park Residents Association	09 Wimbledon	Wi3		Introduction In this submission the London Borough of Merton is referred to as LBM, the All England Lawn Tennis Club is referred to as AELTC and the land on the east side of Church Road is referred to as "the Park". The Site Allocations map on page 282 shows both the existing AELTC tennis facilities to the west of Church Road, and the whole of their landholding in the Park. These are two entirely different sites: - To the West are heavily developed, and constantly redeveloped areas comprising the extensive sports stadia, media, hospitality and other facilities of the private members' tennis club known as AELTC. - To the East is extensive parkland, designated and protected as Metropolitan Open Land (the equivalent of Green Belt), a Designated Heritage Asset registered Grade II*, entirely within a Conservation Area extended in 1993 to protect it against development, and sadly on the Heritage at Risk register due to its poor management and maintenance by all landowners.	Noted.
60	Wimbledon Park Residents Association	09 Wimbledon	N9.1		N9.1 To ensure that Wimbledon continues its success, the policy lists at items (a) to (q) the actions LBM propose to achieve this. Item (o): "Conserving and enhancing the quality of neighbourhoods within the neighbourhoods through Conservation Area character protection, and by supporting incremental development that respects the character and heritage assets within the area." Item (q): "Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and supporting benefits locally." Please note that these items (o) and (q) are contradictory: AELTC development "either side of Church Road", would clearly inflict harm and fails to protect the character of the Conservation Area. Therefore, we ask LBM to review the open-ended endorsement offered to AELTC to undertake development as expressed in item (q)	Noted. No change proposed. The site allocation Wi3 is clear that proposals will have to respond to a number of sensitive designations, stating, "The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations"
60	Wimbledon Park Residents Association	09 Wimbledon	N9.1	9.1.2	Policy 9.1.2 Under the heading JUSTIFICATION, Policy 9.1.2 outlines the priorities for Wimbledon town centre. Amongst them there is reference to Design quality. It states: "The future of Wimbledon should draw inspiration from its past. With many existing high quality listed buildings, future development should enhance their character and setting. Buildings should respond to the principles and materials from their context. Careful consideration to building heights and scale must be given, in particular when relating with heritage assets and views from neighbouring conservation areas." This quoted extract (from Future Wimbledon SPD 2020) should be equally applicable to sites in Surrounding neighbourhoods and/or sites included in the Site Allocations for Wimbledon (Wi3 and Wi16). We would ask for this policy to be referenced in the section relevant to Site Allocation Wi3 whether the Park is within it or not.	Noted. No change proposed. Para 9.1.2 is prefaced with "The Future Wimbledon Supplementary Planning Document (SPD) 2020 outlines the priorities for Wimbledon town centre:" and goes on to describe the contents of the FutureWimbledon SPD. Although it would not be appropriate to refer to the FutureWimbledon SPD in site Wi3 other policies in Merton's Local Plan already address the issues of design quality, responding to context, height and scale and heritage assets. This is particularly in Chapter 12 (policy D12.2 urban design; Policy D12.3 ensuring high quality design for a developments; D12.5 managing heritage assets.

60	Wimbledon Park Residents Association	09 Wimbledon	N9.1	9.1.35	Policy 9.1.35 As mentioned above in our representations with reference to Policy N9.1, the wording of this paragraph should be amended to qualify the LBM support to the continued upgrade and improvement of existing AELTC facilities to maintain its global position as the premier Grand Slam as set out in more detail in the site allocation Wi3. If LBM attaches unconditional priority to support for AELTC's expansion to retain its global position, LBM should have prepared a Special Planning Guidance for the Park and the rest of Site Wi3 setting out in detail the parameters for any development that may be proposed for the site, whether by AELTC or someone else interested in preparing and submitting alternative sustainable proposals. Without such Guidance the tests required by the NPPF cannot be applied.	Noted. No change proposed. Para 9.1.35 states " <i>We will support the continued upgrade and improvement of all AELTC's facilities to maintain its global position as the premier Grand Slam as set out in more detail in site allocation Wi3.</i> " This is a simple statement of support and is not intended to mean unqualified support regardless of the council's role as a local planning authority, highways authority, licensing authority or other functions. The proposed site allocation contains <u>specific reference to the very unique circumstances of the site</u> .
60	Wimbledon Park Residents Association	09 Wimbledon	N9.1	q	n N9.1(q) (Chapter 09, Page 269) the word "either" should be deleted and substituted by "on the west"	No change proposed. 9.1 para q states "Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally." The existing AELTC site lies to the west of Church Road and the proposed site allocation Wi3 on AELTC land lies to the east of Church Road
60	Wimbledon Park Residents Association	09 Wimbledon	Wi3		from the map on page 282 the entire area to the East of Church Road SW19 should be excluded from the Site Allocation Wi3 (just as it is omitted from the map at page 276),	No change proposed. The existing AELTC site lies to the west of Church Road and the proposed site allocation Wi3 on AELTC land lies to the east of Church Road.. A Minor Modification is proposed to update the map illustrating all the site allocations on page 276 to bring it into line with the site allocations as found in the rest of Chapter 9 and in the Policies Map.
60	Wimbledon Park Residents Association	09 Wimbledon	Wi3		from the text box Site Description on page 283 the 4 paragraphs beginning "Wimbledon Park" to the end ("incorporating the Golf Course") should be deleted,	No change proposed. These paragraphs are statements of the site description for Wi3. They state: " <i>Wimbledon Park, including Wimbledon Park Lake, lies at the other side of Church Road to the east of the site. The remaining surrounding area are made up of detached, semi-detached and terraced homes, many set in large plots in treelined streets.</i> " <i>AELTC now owns the former golf course in Wimbledon Park and proposes that this becomes part of the hosting estate for the Wimbledon Championships, enabling the entire site to support the qualifying rounds and the Championships themselves by 2030.</i> <i>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations."</i> The AELTC have commenced the preparation of an updated masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course.
60	Wimbledon Park Residents Association	09 Wimbledon	Wi3		from the text box Site Allocation on page 283 after the words "in all sites" insert "to the west of Church Road",	No change proposed. The existing AELTC site lies to the west of Church Road and the proposed site allocation Wi3 on AELTC land lies to the east of Church Road.
60	Wimbledon Park Residents Association	09 Wimbledon	Wi3		from the text box Design and Accessibility Guidance the words from the beginning ("Development of the site...") to the last bullet point ending "all within Wimbledon Park" should be deleted.	No change proposed. This is important guidance for the development of this site allocation Wi3. These paragraphs state: " <i>Development of the site provide an opportunity to master planning the golf course land to create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC's facilities to continue the prominence of The Championships and the opportunity to host more of the pre-Championship activities within Merton. Other opportunities benefits are:</i> <input type="checkbox"/> <i>Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London.</i> <input type="checkbox"/> <i>In combination with the AELTC Raynes Park site, to support the capacity of the Wimbledon Junior Tennis Initiative, in providing better facilities for the free tennis coaching programme for primary school aged children in Merton and Wandsworth schools.</i> <input type="checkbox"/> <i>Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's "heritage at risk" register by AELTC (former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within</i>
60	Wimbledon Park Residents Association	09 Wimbledon			NPPF Policy background In the July 2021 version of the NPPF, policies to protect Green Belt and Designated Heritage Assets survive any presumption in favour of sustainable development (paragraph 11, Footnote 7). If any harm to those assets would "significantly and demonstrably outweigh the benefits" then the development which would cause that harm is not permitted. If this draft Local Plan introduces the Park as a prospective area of development, it will fail to provide the opportunity to assess that harm. There is already in process a contentious application (21/P2900) for development which remains to be assessed and should provide an appropriate forum at local, regional, and national stage, on appeal and through judicial review, to test these factors. That application alone runs to 101 documents and many thousands of pages which remain to be scrutinised. There is no such scrutiny in this Local Plan process.	Noted. The Local Plan site allocation Wi3 has been subject to more than nine months of public consultation and scrutiny prior to submission to the Secretary of State. All documents and representations are available online. On behalf of the Secretary of State, the plannign inspectorate will organise and host an indepedent examination, subjecting the Local Plan and site allocaiton Wi3 to further scrutiny.
60	Wimbledon Park Residents Association	09 Wimbledon			The NPPF policies which apply to protect the Park are: 8. Promoting healthy and safe communities, Open Space and Recreation.NB the site is a Golf Club with a large membership to which the public are already admitted. 98: " <i>Planning policies should be based on robust and up-to-date assessments of the need for open space ... and opportunities for new provision</i> ". It is noted in the text box Infrastructure Requirements on page 284 that the Park is in an area identified as deficient in access to public open space, yet there is no assessment of the extent of this deficiency and of how much of the Park should be available for this purpose. Any policy which encourages private development will only make this worse. 99: " <i>Existing open space should not be built upon unless ... (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of current or former use</i> ". The existing use of the Park is as a golf club comprising 940 active members and by the terms of its lease the public are also to be admitted to play golf. The Site Allocation offers no equivalent public use of the Park.	Noted. Merton's Green Infrastructure Study 2020 and Merton's Playing Pitch Strategy 2019 provide the NPPF assessments required. In light of their findings, Site Allocaiton Wi3 has a statement on page 284 with the heading "Infrastructure requirements" which states " <i>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies</i> ". Site Wi3 is allocated for an alternative sports provision. Sport England have stated that they support this site allocation.

60	Wimbledon Park Residents Association	09 Wimbledon		<p>13. Protecting Green Belt Land. NB The Park is designated as Metropolitan Open Land, that is Green Belt. 137: "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". 140: "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified". No evidence or justification is advanced for any change to the Green Belt designation of the Park. The justifications in the draft Local Plan apply to the existing AELTC site to the west of Church Road. 141: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundary, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". No such examination appears to have taken place. There are many other potential options to locate tennis courts and stadia within and beyond the LBM boundaries apart from the Park. 145: "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access ... to retain and enhance landscapes ...". Far from allocation for development, the Plan should ensure that the Park is renewed, and its Heritage at Risk status removed, with this paragraph in mind. 147 and 149: "Inappropriate development is, by definition, harmful to the Green Belt ...", and "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt". This Site Allocation of the Park introduces a presumption of development, contrary to these paragraphs.</p>	<p>No change proposed.</p> <p>This Local Plan does not recommend removing the MOL boundary from Site Wi3.</p> <p>As set out in the London Plan 2021, policy G3 Metropolitan Open Land, part B, the criteria of MOL include 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.</p> <p>As set out above, sports and recreation facilities can locate on MOL subject to careful consideration in terms of their effects on MOL. This is echoed in London Plan policy S5 Sports and Recreation where part D states Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G2 London's Green Belt, Policy G3 Metropolitan Open Land and Policy G4 Open space) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.</p>
60	Wimbledon Park Residents Association	09 Wimbledon		<p>15. Conserving and enhancing the natural environment. NB The Park is a site of importance for Nature Conservation and part of a Green Corridor. 174: "Planning policies ... should contribute to and enhance the natural and local environment by (a) protecting and enhancing valued landscapes". This Site Allocation does nothing to protect or enhance the Park. 175: "Plans should ... allocate land with the least environmental or amenity value". The Park is of considerable environmental and amenity value, unlike any of the other Wi sites, as is demonstrated in the table at the end of this submission</p>	<p>Noted.</p> <p>Site allocation Wi3 contains a number of clear statements to enhance the park, including in the Design and accessibility guidance and Infrastructure Requirements headings, which refer specifically to policies within the Plan. These include: <u>Design and accessibility guidance</u> Other opportunities are ...Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's "heritage at risk" register by AELTC (former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.</p> <p>Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II listed Wimbledon Park."</p> <p><u>Infrastructure requirements</u></p> <p>"This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.</p> <p>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green</p>
60	Wimbledon Park Residents Association	09 Wimbledon		<p>16. Conserving and enhancing the historic environment. NB the Park is in the Wimbledon North Conservation Area, designated Grade II*, also a Heritage Asset on the "At Risk" Register. It is the core of the Capability Brown landscape closest to Central London. The whole of this Chapter will be relevant to any application for development of the Park and require considerable scrutiny of all proposals. Substantial harm to the Park, which should be wholly exceptional, will have to be found to be outweighed by substantial public benefits for any development to be permitted. The exercise to balance substantial harm and benefits typically requires considerable resources and reports, and a high standard of proof: see for example Save Stonehenge v Sec of State for Transport [2021] EWHC 2161 (Admin). No such scrutiny will be possible if the Park is included within the Wi Site Allocations for development. 190: "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk ...". Far from such a strategy, the Site Allocation does not seek to resolve the "at risk" issues but instead offers a free-for-all for development. 200: "Any harm to, or loss of, the significance of a designated heritage asset ... should require clear and convincing justification. Substantial harm to or loss of ... (b) assets of the highest significance, notably ... Grade II* listed parks ... should be wholly exceptional." The Strength of Grade II* listing is lost if the Site Allocation promotes development. 206: "Local planning authorities should look for opportunities for new development within Conservation Areas ...to enhance and better reveal their significance." Far from enhancing the significance of the Conservation Area, this Site Allocation of the Park encourages its development.</p>	<p>Noted.</p> <p>The Local Plan site allocation Wi3 has been subject to more than nine months of public consultation and scrutiny prior to submission to the Secretary of State. All documents and representations are available online. On behalf of the Secretary of State, the planning inspectorate will organise and host an independent examination, subjecting the Local Plan and site allocation Wi3 to further scrutiny.</p> <p>The extensive heritage of the site allocation Wi3 is clearly recognised, including stating (page 283)The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations. the site allocation also clearly states that Wimbledon Park is on the "heritage at risk" register.</p>
60	Wimbledon Park Residents Association	09 Wimbledon		<p>London Plan Policy background 7. Heritage and Culture. Policy HC1 E: "Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities form them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use." The whole of Wimbledon Park is designated as Grade II* Heritage at Risk. This submission demonstrates ("Heritage Park at Risk", below) that far from authorising the prospective development of just one part held by one private landowner, LBM should be promoting a comprehensive plan for the whole of it. The Allocation of part for development is a clear breach of this London Plan Policy.</p>	<p>Noted.</p> <p>The allocation of part of Wimbledon Park as Site Wi3 is in line with, and does not breach, the London Plan policy's desire for such at risk heritage assets to contribute to place-making. The closure of the golf course reduces the number of landowners in Wimbledon Park to three (Merton Council, The AETLC and the Wimbledon Club)</p>
60	Wimbledon Park Residents Association	09 Wimbledon		<p>8. Green Infrastructure and Natural Environment. Policy G3 A and C: "Metropolitan Open Land is afforded the same status and level of protection as Green Belt" and "Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified ...". There is no evidence or justification of any proposal to change the MOL boundary, nor even any suggestion of the necessary consultation leading to such a proposal. The Site Allocation ignores the MOL status of the Park, since it fails to provide the same status and level of protection as Green Belt.</p>	<p>No change proposed.</p> <p>This Local Plan does not recommend removing the MOL boundary from Site Wi3. This is not proposed in Merton's Green Infrastructure Study.</p> <p>As set out in the London Plan 2021, policy G3 Metropolitan Open Land, part B, the criteria of MOL include 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.</p> <p>As set out above, sports and recreation facilities can locate on MOL subject to careful consideration in terms of their effects on MOL. This is echoed in London Plan policy S5 Sports and Recreation where part D states Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G2 London's Green Belt, Policy G3 Metropolitan Open Land and Policy G4 Open space) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.</p>

60	Wimbledon Park Residents Association	09 Wimbledon			<p>Heritage Park at Risk</p> <p>The Park has been on the Historic England "At Risk" register since June 2016 when English Heritage (as it then was) wrote to the landowners The Wimbledon Club, Wimbledon Park Golf Club and the London Borough of Merton. The problems were uncertainty around the future, the impacts of divided ownership on landscape management, obscured design views and the deteriorating condition of the lake. In 2016, when the Park was placed on the register as "at risk", the AELTC owned the freehold of the Golf Club, but in 2018 it bought the Golf Club company itself.</p> <p>This is an extract from the current Register: <i>"The divided ownership results in differential landscape management. A masterplan exists for the municipal park, but a shared vision for the whole historic landscape is needed."</i></p> <p>The municipal park mentioned here is the area owned by LBM as trustee for the public. So far as we are aware nothing has been done or changed to overcome either the 2016 or the currently expressed reasons for listing Wimbledon Park as "at risk": there still needs to be a meeting of minds and ambitions, a shared vision, of all landholdings to unite the "whole historic landscape".</p> <p>It seems strange, and a dereliction of their responsibilities as trustee, for LBM to contemplate promoting the singling out of just the AELTC part of the Park for any development. That would simply exacerbate an already serious problem and be less rather than more likely to solve the "at risk" designation.</p> <p>In addition, we would note that despite the lack of a cohesive plan for the Park, the local community and its representatives including this Association have not been involved at all in any discussions to overcome these problems. We have not been informed of any steps to improve it. We submit that it would be perverse to suggest any development of one landholding alone leaving aside all the other policy reasons preventing development.</p>	<p>Noted.</p> <p>Prior to late 2018, Wimbledon Park had four landowners. The largest was AELTC as freeholder for the Golf Club leasehold, second is Merton Council and the smallest parcel of land is owned by the Wimbledon Club.</p> <p>Now that the number of landowners has been reduced to three, AELTC and Merton Council have been working together on Site Allocation W/3. The reduction in number of different landowners and the investment in the former golf course (the majority of Wimbledon Park) should help to address the heritage at risk issues of landscape management</p> <p>In 2018, following extensive public consultation Merton Council adopted the Wimbledon Park masterplan for their land ownership. https://www.merton.gov.uk/leisure-recreation-and-culture/parks-and-open-spaces/parks-and-recreation-grounds/wimbledon/wimbledon-park/wimbledon-park-master-plan</p>
60	Wimbledon Park Residents Association	09 Wimbledon			<p>Covenants against development and Merton's Conflict of Interest as Trustee of the Park</p> <p>The entire Park was originally acquired by Wimbledon Corporation in 1915 as a trustee for the public. LBM took it over from Wimbledon Corporation through local government reorganisation. In 1993 LBM sold the freehold of the Golf Course to the AELTC. This was a controversial sale and the local community tried very hard to stop it, fearing future development. In response to widespread concerns, various undertakings were made in public and in the press by both the Leader of LBM and the Chairman of the AELTC that they recognised that the land should remain open land and free of any future building. As a result, LBM formally minuted several steps to protect it for the future, noting that it was Metropolitan Open Land, extending the Wimbledon North Conservation Area to include it and changing their UDP. LBM also went so far as to impose a covenant on the AELTC, to which the AELTC agreed, in the 1993 Transfer Deed of the Golf Course to prevent future development. The covenant was for the benefit of the remainder of the Park which LBM retained so that <i>building shall not impair the appreciation of the general public of the extent or openness of the property</i>". LBM must enforce that covenant for public benefit, but now seem to have a difficult potential conflict. If they were to promote development through the Local Plan the AELTC might expect them to release the covenant, or if LBM are offered some consideration to release the covenant, they may feel compelled to promote development. Bearing in mind that LBM have responsibilities as trustees to the public, they would be in breach of trust if they were to promote the incorporation of the Park within the development allocation in this Local Plan.</p>	<p>Noted.</p> <p>Covenants are not a planning matter so will not be considered as part of this Local Plan.</p>
60	Wimbledon Park Residents Association	09 Wimbledon			<p>W/3 bears no resemblance to all the other sites allocated for development in this part of the Local Plan.</p> <p>This table [please see original response which includes table of all Wimbledon site allocations: their reference number, address, area in hectares, public or private ownership, current use and designation (e.g. Listed, Conservation area MOL, Nature Conservation)] summarises the data provided for all 14 W/3 sites, and immediately shows how incongruous is the inclusion of the Park in this list, in outright defiance of NPPF 175 "Plans should ... allocate land with the least environmental or amenity value". The Park is not "ripe for development", it is safeguarded by numerous significant designations, and it is a true "greenfield". It is also vastly greater than the other sites.</p>	<p>Noted.</p> <p>Site allocation W/3 is the largest site allocation in Merton's Local Plan. It has the most planning designations.</p>
61	Wimbledon Society Planning Committee	01C Urban Development Objectives and Vision		28	<p>P28 Urban development objectives and vision.</p> <p>Good to see the first strategic objective is tackling Climate Change.</p>	<p>Noted.</p>
61	Wimbledon Society Planning Committee	01C Urban Development Objectives and Vision		28	<p>P28 Suggest amend (d) "Promoting circular economy to ensure that resources INCLUDING STANDING BUILDINGS are kept in use to consume fewer resources, minimise waste AND LESSEN WASTEFUL DEMOLITION".</p>	<p>no further change proposed. Local Plan policy CC2.5 "minimising waste and promoting a circular economy" part (a) states that we will require all development to prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings;</p> <p>no further change proposed</p>
61	Wimbledon Society Planning Committee	01C Urban Development Objectives and Vision		30	<p>P30 Strategic objective 4 should instead read SUSTAINABLE growth not "good growth".</p> <p>Growth is only another term for "development".</p> <p>Demolishing recently constructed buildings is not sustainable, if they are adaptable (see RIBA 5/21).</p> <p>The use of "Good" encourages development for its own sake, and substituting "sustainable" ensures that wider planning aspects are considered</p>	<p>no further change proposed</p>
61	Wimbledon Society Planning Committee	02 Climate Change	CC2.1	34	<p>P34 Strategic policy CC2.1 concentrates only on new development and omits retrofit.</p> <p>Only some 5 – 10% of buildings in the Borough will be built between now and 2050, so the plan should move away from the narrow and traditional confines of Development Control, and embrace programmes of environmental enhancement, and the retrofitting and adaptation of the building stock that is already with us now.</p> <p>We need to see a new type of holistic plan, not repeat the past rather limited planning vision of deciding how to react to applicants' submissions.</p> <p>Town planning is far more than development control.</p> <p>The Council will itself have to take on the role of driving forward the programme of work for not only retrofitting, but also for environmental improvement works and grants of various kinds.</p> <p>As some of the retrofitting work involves the planning function, the lead role could be taken by the Council's planning service, backed by the Local Plan.</p> <p>So one needs an additional policy at F:</p> <p>"Additionally, the Council will actively promote and co-ordinate a range of retrofitting programmes, to bring all existing housing and other buildings up to energy efficient standards".</p>	<p>The delivery of domestic retrofit programmes is not relevant to Local Plan policies - this is covered elsewhere through Merton's Climate Strategy & Action Plan, Climate Delivery Plan and Climate Action Group.</p> <p>Policies CC2.2 and CC2.6 include targets (CO2 reduction and BREEAM) for conversions and change of use schemes resulting in the creation of new dwellings to improve the performance of the existing building stock.</p>
61	Wimbledon Society Planning Committee	02 Climate Change		43	<p>P43 CO2 reduction : The proposed figures for CO2 reduction are based on the long outdated 2013 Building Regulations figures and should not be accepted.</p> <p>The Borough in 2003 won many plaudits nationally for introducing the "Merton Rule", which set standards for energy that were well in advance of the thinking of the time.</p> <p>The approach was later taken on board by other Councils and HMG.</p> <p>The Council now should be taking a much more pro-active stance, and the minimum (which will then become the developers' norm) figures should be set at a significantly higher level.</p> <p>Some independent industry specialists are saying publicly that the true figures should be at least 80% for both residential and non residential.</p> <p>And noting that "Much new housing is using twice as much energy as originally predicted" *.</p> <p>And energy efficiency "Is not a bolt-on activity"*.</p> <p>* (Professor Fionn Stevenson of Building Performance Network 9:2021).</p>	<p>Building Regulations are set nationally and are outside of Merton's control. Merton is required to work within existing national and regional frameworks set by Building Regulations and the London Plan. Until Building Regulations are updated, Merton will need to use current Building Regulations 2013 as a point of reference for local policies.</p> <p>However, Merton is proposing to go beyond Buildings Regulations 2013 and the London Plan by setting the 60% and 50% improvement against Building Regulations 2013 for domestic and non-domestic development respectively based on recommendations from a study commissioned by several London boroughs.</p> <p>Building Regulations are expected to be updated next year; once these have been updated, we will look to update our targets relative to the new Building Regulations baseline.</p>
61	Wimbledon Society Planning Committee	02 Climate Change		43	<p>P43 CO2 reduction: The carbon offset fund figure of €90/ton is again far lower than the independent assessments by industry specialists: a minimum of some £600/ton is instead being quoted.</p> <p>As an example, a local case in 2021 where a block of 50 new flats pays just £35k into the offset fund encourages low standards, old fashioned design, and the payment of derisory figures to avoid doing it well. And leaving the eventual retrofit to others. If the figure had been a more realistic €250k, it could well have been cheaper for the developer to build to the enhanced standard.</p> <p>Where is the sense in building something that soon needs significant upgrading?</p> <p>"The Council should adopt a new "Merton Rule" amelioration fund figure of €600 per ton". Page 2</p> <p>P42 Zero Carbon Targets: These take no account of the carbon released by demolition, only of new construction. Instead, all significant development applications should be required to account for this, which would discourage wasteful demolition of buildings that could be renovated.</p> <p>An additional policy is proposed at F:</p> <p>"F: Calculations of projected carbon emissions should include not only the construction of the new project, but also those arising from any demolition involved".</p> <p>Additionally, as the zero carbon house is currently classed as Code 5 a new Policy at G is needed:</p> <p>"G: All new housing should be designed to be zero carbon (Code Level 5) from the outset".</p>	<p>The respondent is referring to a carbon offset figure of £90/tCO2, but Merton's draft climate change policies are proposing a cost of carbon of £300/tCO2. No proposed change.</p> <p>Merton is proposing to require all schemes resulting in the creation of 30 or more dwellings or 1000sqm or more non-residential development, and all proposals to demolish and rebuild a single dwelling, to undertake a Whole Life-Cycle Carbon Assessment to take into account the emissions from demolition. This addresses the comment proposed for F; no proposed change.</p> <p>Policy CC2.2d requires all new build development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA to demonstrate compliance with the Mayor's net-zero carbon target, or any future locally derived target. This addresses the comment proposed for G; no proposed change.</p>
61	Wimbledon Society Planning Committee	02 Climate Change		50	<p>P50 Minimising energy use: as has been explained above, Policy CC2.3 (i & ii) should have a figure of 60-80% above the long outdated 2013 Building Regs, and not the derisory 10 or 15% quoted, which encourages old-style design, and inadequate construction to continue as before.</p> <p>And it is known that it is far more expensive to retrofit than to build to the higher standard.</p>	<p>The respondent has misunderstood the proposals. The 10-15% targets quoted are the Mayor's energy efficiency targets (i.e. savings achieved through energy efficiency alone).</p> <p>The table in policy CC2.2c sets out the overall carbon reduction targets for different development types.</p>

61	Wimbledon Society Planning Committee	02 Climate Change		51	P51 Monitoring energy use post occupancy is to be commended. But as developers will have long departed, having sold on, there needs to be an incentive to ensure that the calculations provided at the planning stage are matched by the real results over time. (They bear no resemblance currently, according to independent industry specialists). So add: G: " The depositing of a significant developer bond will be required before the building is occupied, redeemable only when the building in use matches its energy predictions after 3 years".	The Be Seen energy monitoring requirements will be monitored through the GLA's Be Seen templates and portal in line with the GLA's Be Seen Energy Monitoring Guidance.
61	Wimbledon Society Planning Committee	02 Climate Change		57	P57 Policy CC2.4: Photo-Voltaic (PV) panels mounted on roofs are playing an increasing role in generating electrical energy, in both new and existing (retrofit) buildings. In mid winter, (when the need for electrical energy is greatest) the sun rises in the south east and sets in the southwest, (London latitude, roughly a 90 degree arc) and is only a maximum of 16 degrees above the horizon at noon, and that for only a short time. Such panels cannot function if they are in shade. It is therefore imperative that new development does not cast any shade onto any adjoining roofs. This is not yet covered in the BRE document on Daylighting and Sunlighting. Accordingly a new Policy is required. At B add (vi): "No new development must cast any shadow on nearby southwards-facing roofs on which PV could be installed, to prevent over-shadowing, which prevents PV panels from working. The Council will produce a basic Design Guide accordingly." The practical effect of such a policy would be to restrict the height of new building so that an angle of about 5 degrees taken from the neighbouring south-facing eaves line is not breached.	No further amendment proposed. In an urban area such as Merton it will not be practical to avoid all new development casting any shade onto adjoining roofs.
61	Wimbledon Society Planning Committee	02 Climate Change		57	P57 Policy CC2.4 The suggested policies A and B are only applicable to new development, and fail to address the 90% plus buildings in the Borough that will need to be retrofitted to reach optimum energy standards. Other urban Councils (eg Nottingham: Wayne Bexton) have set up programmes to reach net zero (by 2028 in that case) to accelerate their projected general slow decline in CO2, and there is a need for this approach to now be included in the Plan. Should add therefore (C): "The Council will promote, facilitate and co-ordinate the retrofitting of energy generation, storage, and energy saving in existing buildings. Additionally, the Council will establish a programme of work, covering Industry, Transport and Domestic Property, to ensure that the Borough reaches net zero by (say 2030?)."	The delivery of domestic retrofit programmes is not relevant to Local Plan policies - this is covered elsewhere through Merton's Climate Strategy & Action Plan, Climate Delivery Plan and Climate Action Group. Policies CC2.2 and CC2.6 include targets (CO2 reduction and BREEAM) for conversions and change of use schemes resulting in the creation of new dwellings to improve the performance of the existing building stock.
61	Wimbledon Society Planning Committee	02 Climate Change		68	P68 Policy cc2.6. Developers currently mis-use the Daylighting and Sunlighting standards set out in the BRE document, and only demonstrate the effect of the new development on the light reaching the windows of nearby buildings. This is despite the existing (and projected) Merton Plan Policy that specifically says that daylighting to "gardens" will also be protected. This old regressive "Common Law" approach now being used by developers is of low standard, and was rightly set aside in the 1950's when new planning standards were introduced, based on protecting levels of light reaching the site boundaries of adjoining property, not just windows. These are established using either rule of thumb struck angles, or calculated using protractors. A more specific policy is therefore desirable to get back to those proper early standards. Add new policy after B: "Requiring all development to protect the natural daylighting to adjoining gardens, lands and buildings, by ensuring that a 43 degree light angle* to adjoining site boundaries is maintained, and a 25 degree light angle* is maintained from opposing windows." (* these are measured from the top of a 2m high notional fence on the site boundary, or 2m high from an opposing window. See for example figures 3 and 11 in the BRE publication of 2011).	The policy wording has been reviewed and no further action has been taken. Policy D12.3.f 'Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens' highlights the importance of protecting the quality of neighbouring amenity spaces.
61	Wimbledon Society Planning Committee	02 Climate Change		37	(A) P 37Chapter 2: Climate Change, in Strategic Policy CC2.1 - Typo in Para 2.1.11 – for "29,0002" read "29,000"?	Noted. This 2 was to reference a footnote that was not in superscript by error. This will be corrected.
61	Wimbledon Society Planning Committee	05 Morden	Mo4	201	P201Site Mo4 Whilst Morden is generally regarded as being outside the Society's main area of interest, as an important town centre it is hoped that the Council's Plan will form the basis for a better future. Heavily dominated by traffic, with large open areas that seem wind-swept and pedestrian-unfriendly, there is a need to have an imaginative and creative approach, one that is not dominated by the short term interests of individual landowners, nor of traffic. The presence of an important station terminus (shortly approaching its centenary) and with its large bus hub, acts as an important focus.	The policy seeks to secure transport and public realm improvements, which includes the retention of the locally listed station building and an appropriate solution to the bus standing and stopping facilities.
61	Wimbledon Society Planning Committee	06 Raynes Park	N6.1	220	P220Policy N6.1:The present station is not suitable for a modern rail network, and needs both a rebuild and probably a relocation. The potential for radical improvement presented by the Crossrail 2 should be planned for, and land for the future station (further eastwards) should be safeguarded (see Table 16.1). Add to (F): "...that new structures are sensitively located, designed and compliment the wider residential area...."	Additional modification proposed to (f) to replace Crossrail2 with Network Rail as Crossrail2 is currently unfunded and will not be delivered within the lifetime of this local plan
61	Wimbledon Society Planning Committee	06 Raynes Park	RP2	227	P227 Site RP2: This should be taken into site RP3, both being in the same ownership. This would simplify the replacement for the existing east-west public footpath across the site, and the creation of a new public cycleway with the attendant links into the adjoining areas. Providing land area for the expansion of the adjoining Primary school should be included as one of the uses. Additionally, although the current use is employment, it would be preferable to concentrate the non-residential uses along the A3 (on the RP3 site), allowing the Burlington Road frontage, with its school etc to be primarily residential. "Focussing" the residential towards the Burlington Road frontage, with its existing local shops, would chime with the "20 minute neighbourhoods" approach mentioned in the Plan's Transport section.	No further amendments proposed.
61	Wimbledon Society Planning Committee	06 Raynes Park	RP3	233	P233 Site RP3: The reference to the site being suitable for taller buildings should be qualified, as the wider area is generally of low height. Add: "...which could contain some higher buildings, but limited to 5 storeys. Additionally, the Pyl Brook runs along the northern site edge, and given that the site is both "deficient in nature" and lacks public open space, a public green space alongside the watercourse should be incorporated, able to accept flooding surcharges if required. Additionally, the heavy noise from the A3 already blights the wider area. Accordingly add: "The design of afuture development should place a (largely non-residential) building mass alongside the A3, thereby creating a noise barrier and creating a quiet hinterland within the site." Network Rail has indicated that the adjoining level crossing is of concern, with frequent closures being required to accommodate the train movements, as well as the potential for accidents. If the level crossing is to be replaced in some form, then it is possible that a portion of the RP3 site could be utilised. Accordingly, the "list of future uses" should include "A portion of the site opposite the level crossing may be required to allow an alternative road/rail design".	No further change proposed. Network Rail has not stated that part of the site is required for alternative rail / road design at this time.
61	Wimbledon Society Planning Committee	06 Raynes Park	RP6	240	P240 Site RP6: The development of the northern portion of what was a much larger defined open space site was only agreed on the clear and public basis that the remainder (now RP6) would be kept as open space. This should remain the position, and on no account should there be any further loss of this open green land to development. Therefore Add the following: "Should the present owners not be able to maintain this open land, the Council will consider leasing or acquiring it, and utilising it for allotments, tree nursery or other 'green' public uses."	No amendment proposed. The council does not propose to acquire or lease site allocation RP.6 LESSA
61	Wimbledon Society Planning Committee	06 Raynes Park	N6.1		Pp 220-224 Chapter 6: Raynes Park, Policy N6.1 (h), (j) & (l) & Paragraphs 6.1.1 and 6.1.12 all include references to Wimbledon Chase, which is within the defined Wimbledon area, not Raynes Park.	Agreed. Changes have been made to ensure the Wimbledon Chase references are made clear in the Wimbledon and Raynes Park policies.
61	Wimbledon Society Planning Committee	07 South Wimbledon	N7.1	255	P255 Policy N7.1 SOUTH WIMBLEDON Policy (A) for creating "a new local centre" is welcomed, but does not address the principal and highly destructive local issue of the constant through traffic, which brings nothing to the centre other than noise, danger, fumes. The Plan's intention to Improve shopfronts and paving etc is welcome but essentially cosmetic, and can only do so much, whilst the major environmental problem remains unresolved. The buses and local service vehicles bring in people and goods and should remain, but the opportunity exists to re-route all through traffic via Merantun Way. Accordingly, the following should be added: "..... Merton High Street meet. In order to create a more attractive centre, through traffic will be re-routed via Merantun Way, leaving only the bus services and local service traffic in what will then be a largely pedestrian-dominated centre".	no further change proposed. This is not proposed for delivery via this Local Plan
61	Wimbledon Society Planning Committee	07 South Wimbledon	N7.1		Pp 249-260Chapter 7: South Wimbledon, the Site Allocation for South Wimbledon Station should be listed under this Chapter (say as SW1), not under Chapter 9, Wimbledon, as site W/8	An additional modification has been proposed to the South Wimbledon chapter maps to identify W/8 South Wimbledon Station in relation to South Wimbledon's proposed local centre.

61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	267	<p>P267. Policy N9.1 WIMBLETON TOWN CENTRE</p> <p>It would be fair to say that there is a fundamental difference of approach between the Council and the Society as to the future plan for the town centre. The Council believes that its Development Control-centred approach, with more "growth", more offices, higher buildings, and improving local placemaking is the model to follow.</p> <p>The Society on the other hand feels that a more holistic approach to town management is needed, with an emphasis on responding positively to Climate Change. Rather than more offices, we need more housing. Rather than "growth" (which often involves pulling down recent buildings) we need more adaptation and renovation in a mixed use town.</p> <p>That building heights should be no more than around 6 storeys maximum, as local people in Council-run workshops have consistently called for. That more pedestrianisation of the centre is the key to keeping people in the centre longer, and so creating an adaptable and resilient town.</p> <p>The Council's approach is set out in its town centre SPD. The Society's approach is set out in its publication 'Vision 2040', produced in 2018. A copy is enclosed.</p>	noted - individual matters addressed in representation comments below
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	267	<p>P267 Policy N9.1</p> <p>(B) Gives too much emphasis to development for its own sake, and should not be accepted. Responses to Climate Change are suggesting a less aggressive approach, with the emphasis more on the adaptation and retrofitting of existing buildings.</p> <p>The emphasis on large new office development is seen as misplaced. Office workers and their working patterns are not what they were at the start of this plan-making process.</p> <p>Office workers populate the centre at very limited times, residents by contrast are ever-present.</p> <p>Instead the first sentence should be omitted, and replaced with: "Encourage development that respects local character and the pedestrian scale, attracts new residential and mixed uses, together with business, visitors and tourism".</p>	no further change proposed. N9.1(b) states " Driving investment and innovation in workspaces to support the local economy and jobs in the town centre commensurate with Wimbledon's role as a major centre. Encourage development that attracts residents businesses, visitors and tourism to the area all year round, including high quality hotels, conference facilities and cultural activities." Development encompasses everything from a change of building use, to refurbishment to redevelopment. Wimbledon is Merton's only major centre and contains a substantial amount of the borough's cultural and creative offerings, opportunities for socialising and work. It is important that the Plan is clear that investment is welcomed if Wimbledon is to thrive and not decline.
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	267	<p>(C) This approach in the Plan relies on an essentially cosmetic approach, which does nothing to improve the air quality, traffic noise and danger experienced by pedestrians in the heart of the town.</p> <p>It is clear from many examples that a well-designed centre has to be attractive to pedestrians, and encourage them to stay, not merely "shop and go".</p> <p>The present town centre is dominated by traffic, with pedestrians given the space left over. Perpetuating this out-dated town centre model (with better paving) should not be a plan strategy.</p> <p>The Council itself in 2013 produced a scheme that was seen as a first step to removing through traffic from part of the Broadway, but this failed to get funding support from TfL at that time.</p> <p>This approach should be re-visited.</p> <p>Instead (C) should read: "Enhance the town centre by progressively removing the through traffic from the heart of the town, with its traffic danger and fumes, and create a largely pedestrianised centre." The possible sequential steps to achieve this are set out in Vision 2040.</p>	No further change proposed. A reduction in vehicles passing through Wimbledon town centre would have benefits for noise and air pollution. However Wimbledon Broadway remains an A-road and one of only four vehicle crossing points of the railtracks between Raynes Park and Dunsford Road. In the absence of substantial redevelopment of the entire station block by Crossrail2 taking place within the lifetime of this local plan, there are no viable proposals to reroute traffic through surrounding streets to other bridges crossing the railway tracks
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	267	<p>(E) Local public views (in Council-run workshops) are consistently clear that buildings over the height of the CIPD building (22m to the eaves) are not wanted. Setting higher buildings away from the historic core is welcomed, but the interpretation of the "higher buildings" in the Council's SPD is not accepted.</p> <p>Such buildings stimulate too much development and introduce a scale that is not wanted.</p> <p>Limiting future heights to no more than 22m (away from the historic core) still gives significant opportunities for increasing floorspace.</p> <p>Instead (E) should have an additional phrase: "Any such taller developments would not exceed 22m to the eaves".</p>	A Main Modification is proposed to Merton's local plan to incorporate a Strategic Heights Diagram in Policy D12.6 Taller buildings, clarifying that building heights in Wimbledon town centre are aligned with the FutureWimbledon SPD. This is to address the GLA's representation and bring Merton's local plan into general conformity with the London Plan 2021.
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	267	<p>(G) The evening and particularly the night-time economy is part of a centre, but with residents living so close by, it can be highly disruptive. Accordingly, it needs to be made clear that such activities are only possible when they are both suitably located and time limited.</p> <p>So add an additional phrase: " and community uses, subject to being subservient to residential uses and amenity".</p>	No further change proposed. Paragraphs 9.1.22 and 9.1.23 in the supporting text to this policy clarifies that a balanced approach is needed to the night time economy that recognises its benefits while ensuring potential harm is addressed.
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	268	<p>P268: (H) The reference to the Council's SPD on the town centre is not accepted.</p> <p>It is considered to be outdated, & fails to learn from the social changes generated by the pandemic. It promotes over-large development of the wrong kind, lacks creativity, and fails to enhance the pedestrian experience.</p> <p>It also perpetuates the domination of the centre by traffic. It is also not appropriate to imply that this Plan is in any way subordinate to the SPD: it is the other way round.</p> <p>The reference to the Future Wimbledon SPD should be removed.</p>	No further change proposed. The FutureWimbledon SPD was adopted in 2020 and remains an adopted SPD to guide development proposals in Wimbledon
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	269	<p>P269: (Q) As written, this could give the AELTC a green light to develop their newly acquired open lands to the east of Church Road. These lands however are zoned as Metropolitan Open Land (MOL) and should therefore not be built on.</p> <p>Additionally, they are part of the great landscape Park designed by Capability Brown in the late 1700's, and are designated by Historic England as a Listed Historic Park, grade 2 star.</p> <p>A recent planning application by the AELTC for substantial new buildings on that land is being strongly resisted by those who consider that the land 'zoning' should preclude any such development. (See also P282 site W13 below).</p> <p>Accordingly, this should be re-written to read: ".....support the upgrading of the AELTC's facilities whilst maintaining the unique heritage of the open parkland, being part of the Capability Brown landscape, and with its MOL zoning".</p> <p>The Ravens Park reference remains.</p>	No further change proposed. The full paragraph at N9 (q) states "Recognise the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities either side of Church Road and at Raynes Park to maintain its global position as the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally. "
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1		<p>9.1.2 As has been explained above, the Council's SPD is not now considered to be the model for the town's future, and needs significant revision. Reference to it therefore should be dropped.</p> <p>The five 'priority' elements are well-meaning, but are essentially aimed at new development with its attendant "Development Control" approach, accompanied by some essentially cosmetic re-paving and planting.</p> <p>Instead, the emphasis needs to go wider. Positive adaptation and upgrading of much of the building stock, introduction of more housing, improving the heart of the town for pedestrians by progressively removing traffic, lessening the importation of gas-driven energy, flexibly managing and encouraging the interaction between 'shops' and the new pedestrian areas.</p>	No further change proposed. The FutureWimbledon SPD was adopted in 2020 and remains an adopted SPD to guide development proposals in Wimbledon
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	271	<p>P271 9.1.6 the reference to only "moderate increase in heights" is misleading.</p> <p>12 and 14 storeys are being touted, totally against the clear wishes of the public at the Council-run planning workshops, who were clear that that 6 storeys (22m to the eaves) was to be the maximum, and lower in conservation areas.</p> <p>Independent Studies are showing that housing of 4/5 storeys is more efficient in energy terms than those of 10 storeys and higher".</p> <p>Also that offices of 10 or more storeys used 75% more electricity per sqm than those of 5 storeys or under". (* Smith & Gill 11/20) (**UCL Energy Institute 2018).</p> <p>Accordingly, add: ".....moderate increase in heights up to a maximum of 22m only in some places away from the historic core".</p>	no further change proposed. Paragraph 9.1.6 states that Wimbledon has no scope to accommodate growth by expanding outwards. The range of building heights being proposed across Merton's only major town centre is modest relative to other major town centres and carefully considered based on local character, consultation feedback and other matters
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1		<p>9.1.11 The imperatives of Climate Change and Sustainability are encouraging more emphasis on renovation and adaptation of buildings, rather than the more simplistic past approach of redevelopment. (see RIBA 6/21).</p> <p>Contrary to what is being implied about buildings from the 1960's, their basic structure is often in perfectly good order, and can be retained and adapted, perhaps with new facades and services.</p> <p>The true reason for much redevelopment is not obsolescence, but the opportunity to put more floorspace onto the site.</p> <p>Accordingly, OMIT "usually built since the 1960's and nearing the end of their useful life"</p>	No further change proposed. the full paragraph states "Growth can be achieved by occupying more of the site and adding floors. The Council will also support the redevelopment or refurbishment of offices and other buildings, usually built since the 1960s that are nearing the end of their useful life. " which reflects the desire, expressed elsewhere in Chapter 2 climate change, to refurbish buildings as well as replace them to accommodate growth.
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	273	<p>P273. 9.1.20 The emphasis on attracting major offices is misplaced.</p> <p>The principal need is for mixed uses and more housing, not more offices.</p> <p>The latter bring in outsiders who are active in the centre for a very limited time in the day, and have very little allegiance to the locality. By contrast, the new residents are linked to the centre permanently, and support a far wider variety of activities. And bring life at weekends.</p> <p>This should be rewritten (third sentence): ".....along the Broadway. The Council will support the refurbishment or development of mixed uses, residential and some offices".</p>	No further change proposed. Wimbledon is the only place that is attractive to the office market in Merton and where offices can and want to locate. People living in Merton also work in Wimbledon's offices, and these not only support businesses and jobs but also spend in the town centre and support other cafes, restaurants, shops and services. A number of office buildings have been substantially refurbished in Merton which demonstrates the strength of the office market here.
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	273	<p>P273/4 9.1.24 Needs re-writing: ".....It has a rich heritage of listed and period buildings with a unique character, with Wimbledon Common nearby".</p>	Additional modification for clarity to read "Wimbledon Village is a Local Centre with a unique and attractive environment: high quality physical fabric and landscaping, protected by Conservation Area designations. It has a rich heritage and period buildings, ... with Wimbledon Common nearby. "
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	274	<p>P274: 9.1.26: The existing paragraph 9.1.26 understandably sets the scene, but there is an opportunity to identify a positive enhancement that the Council is already exploring.</p> <p>Suggest a new paragraph at 9.1.26A:</p> <p>"With a relatively busy road through the Village, space for the pedestrian is mostly limited to pavements. However, the opportunity to semi-pedestrianize the western arm of the High Street could provide more space, increase footfall, and allow a wider range of outdoor facilities to take place on the important route linking the Village and the Common"</p>	No further change proposed. The council supports a market and limits traffic at various times in the route linking the Village and the Common; this is outside the local plan process and further pedestrianisation is not intended to be introduced or delivered via this Local Plan

61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	275	<p>P275: 9.1.35 AELTC This could be interpreted as being supportive of the current AELTC proposals for the introduction of substantial new buildings on their newly acquired lands to the east of Church Road.</p> <p>This would be totally against both the MOL zoning and the open-ness of the Historic Parkland.</p> <p>Suggest the addition of: "..... in site allocation Wi3,whilst recognising the importance of both the MOL designation, and the unique heritage of the open parkland, being part of the Capability Brown Landscape". (See P269Q above)</p>	<p>No further change proposed. Paragraph 9.1.35 states "We will support the continued upgrade and improvement of all AELTC's facilities to maintain its global position as the premier Grand Slam as set out in more detail in site allocation Wi3". Site allocation Wi3 contains reference to a broad number of matters including sports, open space, travel, heritage etc. It is not necessary to repeat these here.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	N9.1	276	<p>P276: The boundaries of the AELTC sites identified as Wi3 do not match those shown at page 282.</p> <p>Site allocations Wi 9, 10, 13, 14, form a cluster around Worple Road and St George's Road, but the summary map shows only sites Wi 10 and 13. Sites Wi 9 and Wi 14 should be added to the map.</p> <p>Opposite these sites there appear to be definite proposals to develop St George's House East, so should not St George's House West and East now be added to the site allocations map?</p>	<p>An additional amendment has been proposed to clarify that the summary of Wimbledon sites illustrated in a map on page 276 held the incorrect map allocation for Wi3 and that the map shown within the allocation on page 282 was correct and to add clarity for site Wi9 (already included but a small site so overwritten by its neighbours). Site Wi14 has already been developed so has been removed from the Local Plan.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi1		<p>P277 Site Wi 1 Battle Close:</p> <p>Being in the Council's ownership, there is an imperative to utilise this site for social and community benefit, rather than (in the case of privately owned land) for profit.</p> <p>As the site adjoins a Primary School, playground space expansion should be actively considered.</p> <p>HMG is currently promoting self-build, and requiring Councils to identify sites.</p> <p>One possible 'model' would be a short terrace, where the Council would specify the basic building line, eaves heights etc that had to be followed, and each site purchaser would then have to design accordingly. Such a model has been used successfully, and the end result has merited awards.</p> <p>Accordingly the site allocation description should include: "Expansion of the adjoining primary school site: also the provision of a terrace of Self Build housing".</p>	<p>No further change proposed. There is no identified need to expand the nearby primary school or any of Merton's primary schools at this time, as demonstrated by Merton's infrastructure delivery plan. Merton's evidence on housing need (particularly Merton's Strategic Housing Needs Assessment 2019 and Merton's draft housing delivery strategy 2021 demonstrates that the overriding need is for affordable homes, particularly those in the social rented sector and there are over 9,000 households on the council's waiting list. While the council is supportive of self build Merton's AMR demonstrates that there has been a relatively strong track record of self build occurring in Merton (8% of homes built in 2018/19 and 5% of homes built in 2019/20) it is not considered that the need for self build outweighs other forms of housing. Self build could still take place on this site within the proposed allocation</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi2		<p>P280Site Wi 2: WTC Broadway Car park:</p> <p>The site being in the Council's ownership, there is the imperative to utilise it for social and community benefit, rather than (in the case of privately owned land) for profit.</p> <p>As the site adjoins the Listed Theatre, also in the ownership of the Council, it is expected that the Council would wish to retain the freehold, and dispose only of the lease.</p> <p>Three additional potential uses should be included.</p> <p>Firstly a Public Hall, able to be linked to the Theatre as required, for exhibitions, community facilities, weddings, performances.</p> <p>Whilst not a full replacement for the Town's Civic Hall (demolished in the 1980's to make way for the Centre Court development), and noting that the then Council's firm promise for replacement has never materialised, this is an opportunity to add another dimension to the Arts and performance scene locally.</p> <p>Secondly, whilst the Council has rightly sought to start up a town-centre-wide CHP scheme, the identification of a central energy site is still awaited. This Council-owned site should be considered.</p> <p>Thirdly, the College of Arts (a constituent College of the University of Arts London, together with Chelsea, Saint Martins, Camberwell and others) is a well known and long-respected institution, that has its campus nearby. But it lacks a presence in the town itself.</p> <p>Both the Town Centre life and the College life could gain if part of the site was established as an 'Arts outpost'.</p> <p>Accordingly, the list of potential users should include, energy centre, public hall able to be linked to the Theatre, and a College of Art adjunct.</p>	<p>No further change proposed. The proposed site allocation for "a suitable mix of town centre type uses such as retail, cafes and restaurants, community, cultural, leisure and entertainment, offices and a hotel" would allow for the development of a public hall. The College of Arts already has a presence in the Wimbledon neighbourhood. the council does not intend to allocate this key site for a combined heat and power plant.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi2		<p>P281Site Wi 2: WTC Broadway Car park: The proximity to the Listed Theatre should mean that "taller buildings" should not be seriously considered on this site.</p> <p>To make a general point: As the Local Plan, when approved, is a superior document to the town centre SPD, it follows that when the references to taller buildings are removed, the SPD will need to be amended.</p> <p>Accordingly: Remove all reference to taller buildings in a future development on this site.</p>	<p>The council is proposing a Main Modification to Merton's Local Plan on tall buildings to bring Merton's Local Plan into general conformity with the London Plan. This Main Modification introduces a Strategic Heights Diagram within Policy D12.6 "tall buildings" which defines an approach to taller buildings in Wimbledon town centre based on the heights identified in the FutureWimbledon SPD 2020. The FutureWimbledon SPD was subject to extensive public consultation and is based on a thorough analysis of the area. this sets a height of 6 storeys for this site allocation; however the reference to taller buildings being in line with the FutureWimbledon SPD remains within the site allocation as a non-residential 6-storey building (such as a public hall) may be slightly taller in metres than a residential 6-storey building</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi3		<p>P282: Site Wi 3:The All England Tennis lands</p> <p>P264: A clear distinction must be made in the Plan between the AELTC lands to the west of Church Road, and the newly acquired golf course lands that lie to the east. The latter are formally designated as Metropolitan Open Land (MOL), and are also part of the Listed Historic Park grade 2 star.</p> <p>These designations have been in place for very many years, and the freehold of the land was purchased by the AELTC from the then Council in the 1990's, with that aspect fully understood, and confirmed in public statements, undertakings and covenants.</p> <p>The London Plan (and its GLC Plan predecessor) and the various Local Borough plans since the creation of the Borough in 1965 have all made clear that this area is open unbuild parkland, and is designated as MOL, the equivalent of Green Belt.</p> <p>The NPPF (and its predecessor DoE Circulars etc) have been clear that Green Belt land is to remain unbuild. This clear policy line has been maintained over time, nationally, regionally and locally.</p> <p>This is land therefore (to the east of Church Road) that must remain open and unbuild.</p> <p>The current wording in the Plan however is ambiguous, and needs to be clarified.</p> <p>Firstly, the Wi 3 designation should refer only to the 3 sites west of Church Road.</p> <p>The lands to the east of Church Road, being the MOL etc, should be given a separate designation, (say Wi 3A) and described clearly as noted above.</p> <p>All these eastern lands, and the rest of the Park, are also designated as a Conservation Area.</p> <p>Secondly, the notes should be amended to refer only to the western sites, and all references to the eastern MOL lands should be removed, and placed in a separate entry.</p> <p>Paragraph 4 should read "The main western site is approximately 14 hectares"</p> <p>Paragraphs 5, 6, 7 should be omitted and placed in the new entry for Wi 3A.</p> <p>Additional phrase to be added to paragraph 7: ".....respond to these sensitive designations.</p> <p>In order to comply with these, no new structures of significance can be considered appropriate on the golf course lands".</p> <p>Under the new Wi 3A entry, the 'Design and Accessibility guidance' should instead read:</p> <p>"A master plan for the golf course land is to be prepared providing for some additional open tennis courts, within the clear parameters of fully maintaining the complete open-ness of the MOL, and with a respect for the Historic Park, with its veteran trees and natural zones".</p> <p>On 'Infrastructure Requirement' an additional phrase is required to make clear that 'Church Road is to remain as a fully public highway', and is not to be subsumed into the AELTC lands. Should restricted public access be required during the tennis fortnight, then this should be arranged on a yearly and temporary basis, using normal highway closure licensing procedures.</p>	<p>No further change proposed. The site allocation Wi3 is for "world class sporting venue of national and international significance with support for continued and long term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake". The site allocation does not propose to remove the MOL or heritage designations and provides an opportunity to address the fragmented land ownership and management which is identified as a cause for the Grade II* listed Wimbledon Park being on the Heritage at Risk Register. It also provides an opportunity for greater public access to and through the landscape</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi5		<p>P286: Site Wi 5Hartfield Road Car Park</p> <p>Being in the Council's ownership, there is an imperative to use this site for social and community benefit, rather than (in the case of privately owned land) solely for profit.</p> <p>There is currently a private proposal for a major music centre, which could add a significant amount to the Town Centre's "Arts offer" if the scheme can be made viable.</p> <p>There would be advantages if the Council was able to positively engage with the promoters of the project, to see whether it can be taken forward.</p> <p>Rather than being an "elitist" concept, a much more inclusive approach might allow for significant educational input to both local schools and the wider community.</p> <p>Accordingly, the site allocation notes should be amended to read: "..... including assembly, leisure, music centre, retail, offices, residential, hotel."</p> <p>Retaining the freehold and leasing the site would allow the Council to maintain a degree of control over the functioning of public-facing facilities, as well as generating a long term and increasing income.</p> <p>It is said that the income to the Council from the car parking use of the site has been upwards of half a million pounds annually.</p> <p>The reference to including taller buildings (P288) is not agreed, and should be removed.</p> <p>The scale of local buildings, noting the adjoining cottages in Ashbourne Terrace, as well as the clear message from public workshops, means that a taller building here would not be appropriate.</p> <p>The detailed text for this site appears rather poorly put together, with extracts in part from what might be an estate agents' brochure. Such writing does not meet the standard set elsewhere in this Plan by the Council, and would benefit from review.</p>	<p>No further change proposed. The proposed site allocation includes "assembly and leisure" which would support a major music centre. The council is proposing a Main Modification to Merton's Local Plan on tall buildings to bring Merton's Local Plan into general conformity with the London Plan. This Main Modification introduces a Strategic Heights Diagram within Policy D12.6 "tall buildings" which defines an approach to taller buildings in Wimbledon town centre based on the heights identified in the FutureWimbledon SPD 2020. The FutureWimbledon SPD was subject to extensive public consultation and is based on a thorough analysis of the area. this sets a height of 6-8 storeys for this site allocation</p>

61	Wimbledon Society Planning Committee	09 Wimbledon	Wi6	<p>P289Site Wi 6165/71 Broadway The Site Description fails to mention that even at the present height, being on the southern side of the road, in the winter months no sun can reach the public footway on the opposite side of the Broadway. Accordingly, the site description should be amended to include: "Because as even the present height prevents sun from reaching the opposite footway in the winter months, no increase in height would be appropriate, and the recessed building line should be retained". The reference to taller buildings being included (P290) should therefore be omitted.</p>	<p>The council is proposing a Main Modification to Merton's Local Plan on tall buildings to bring Merton's Local Plan into general conformity with the London Plan. This Main Modification introduces a Strategic Heights Diagram within Policy D12.6 "tall buildings" which defines an approach to taller buildings in Wimbledon town centre based on the heights identified in the FutureWimbledon SPD 2020</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi7	<p>P292 Site Wi 7Ravensbury Terrace The site location table (P294) should be amended to show that it does have an impact on a designated open space, being immediately beside it: "Yes, being adjacent to the Durnford Road Recreation Ground, and being within 400m of" Add to Infrastructure requirements: (P293): " Any development should be well set back from the boundary of the open space, to ensure that it is not over-shadowed". Add to the Design and Accessibility Guidance (P293): "Because the site is at the end of a long cul de sac, pedestrian movement and accessibility would be less than ideal. Any development for residential should be dependent on achieving an additional and alternative footpath link to the surrounding area".</p>	<p>No further change proposed.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi8	<p>P295 Site Wi 8South Wimbledon Underground Station Add to the Design and Accessibility Guidance (P296) : "Any development should include a significant upgrading of the interior of the station entrance hall and its facilities. See also comments on Policy N7.1 above". This is a well-used station and important in its locality, and its upgrading would be highly desirable. As this site is in South Wimbledon, it should be deleted here and relocated to the relevant chapter and re-numbered.</p>	<p>No further change proposed to the site allocation. The "Design and accessibility guidance" section already references that development proposals must respect and enhance the Grade II listed heritage asset of South Wimbledon Station and that development should explore the opportunity to create a secondary entrance to the station and public space to provide greater permeability and movement options for people using the station. An additional modification has been made to the maps in Chapter 7 South Wimbledon to illustrate Wi8 in relation to the proposed South Wimbledon Local Centre; the site allocation is in the Wimbledon chapter</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi9	<p>P298Site Wi 928 St George's Road Being in the Council's ownership, there is an imperative to use the site for social and community benefit, rather than (in the case of privately owned sites) for commercial gain alone. Given that the site is in an area "deficient in nature", consideration should be given to using the site (in the short term initially) as a small public garden. Funding could be via CIL payments. Accordingly: Add to the Design and Accessibility Guidance (P299): "The Council will encourage the interim use of the site as a Community Garden, designed and maintained in part by local groups. This will not only provide a local open green space for public use, it could also operate as a centre for local groups to facilitate the future town plan, and act as a local public information centre on Climate Change and the Retrofitting programme". The reference to taller buildings being included is not appropriate and should be deleted.</p>	<p>No further change proposed. Meanwhile uses do not need to be part of the site allocation.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi10	<p>P301Site Wi 1030 St George's Road The reference to taller buildings being included is not appropriate, and should be deleted. As it appears that the daylight to the rear 'garden' land (currently parking) could be severely compromised by a proposed development to the southwest, contrary to plan policy, Add: "It would be an advantage if sites Wi9 and Wi10 could be designed together".</p>	<p>The council is proposing a Main Modification to Merton's Local Plan on tall buildings to bring Merton's Local Plan into general conformity with the London Plan. This Main Modification introduces a Strategic Heights Diagram within Policy D12.6 "tall buildings" which defines an approach to taller buildings in Wimbledon town centre based on the heights identified in the FutureWimbledon SPD 2020. The FutureWimbledon SPD was subject to extensive public consultation and is based on a thorough analysis of the area. This sets a height of 8-10 storeys for this site allocation. The "design and accessibility guidance" section for this site allocation already states "opportunity for a co-ordinated approach to design and development delivery with the following site allocations Wi9, Wi10, Wi13 and Wi14" An additional modification is being included to remove reference to Wi14 as this site has been removed from the Plan prior to Regulation 19 as it has already been redeveloped.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi11	<p>P303 Site Wi 11 Broadway, Hartfield Crescent, Hartfield Road and Piazza The site description needs to include the following: "The majority of the Broadway frontage is within the defined Broadway Conservation Area, as are the sites adjoining to both east and west. The opposite side of the Broadway is also within the Conservation area". The fact that the site description has not made this clear is disgraceful, and is to be deplored. The reference to the South Park Gardens conservation area is not correct and should be removed. "The pedestrianised link between the Broadway and Hartfield Road follows the original line of Victoria Crescent, and is a public highway. This should remain. The pedestrian route on the eastern site boundary, leading to the Council car park is also a public highway. "This site was redeveloped in the 1980's, and as such, should be considered for renovation and adaptation rather than what is likely to be seen as wasteful redevelopment, and contrary to the emerging principles around sustainability and climate change. Embedded carbon from demolition should be included in sustainability calculations. "The creation of the Piazza has proved an important success, and is now seen as an asset both as a pedestrian space, and as an important space, with its own distinctive image in the town. "It also allows winter sun to penetrate into the Broadway, which otherwise is in permanent shade. The retention of this iconic Piazza space should now be regarded as an essential. The height of the Broadway frontage reflects the scale of the other properties in the conservation area and should be maintained. "The presence of a single large supermarket along one side of the Piazza and Victoria Crescent has had a dulling effect, with little interest, blanked frontages etc. It would be substantially improved if the "small narrow frontages" policy approach (see Page 455) was applied here. "Depending on the detailed design studies, if Hartfield Road is to become 2-way, a setting back of the ground floor facade, and/or the redesign of the footway may be needed." The reference to taller buildings being appropriate should be removed, being within the conservation area.</p>	<p>An additional modification has been proposed to amend the name of the conservation area toThe Broadway</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi12	<p>P306Site Wi 12: Wimbledon Stadium site It is not clear why this site is included, being largely constructed: nor why the accompanying map is now outdated.</p>	<p>The majority of site Wi12 has completed or is shortly to finish construction as a football stadium, squash and fitness centre, retail and +600 homes. However approximately a quarter of the site is in separate ownership (known colloquially as the Volante Land) and planning permission has been granted but not fully delivered on this part of the site. The allocation is remaining for clarity across all the landholdings. The council's maps are based on Ordnance Survey data and prior to Regulation 19 Ordnance Survey had not updated their data to include the new football stadium. This has now been done.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi13	<p>P310Site Wi 13Worple Road/St George's Road: Sainsburys P311Of the two road frontages, Worple Road is by far the more interesting for pedestrians with its variety of uses, some small frontages, bus facilities etc. Accordingly, (para 2) should instead say: " active street frontage along Worple Road ...". The defined shop frontage map in the Appendix should be amended & show this site as shopping. The reference to taller buildings being acceptable should be removed. The critical drainage area designation needs to be reflected in the proposals: suggest add: "The flooding from surface water should be countered by suitable on-site amelioration measures".</p>	<p>No further change proposed. The "design and accessibility guidance" section of the site allocation states that development proposals must provide an active frontage on Worple Road or St Georges Road and provides an opportunity for design and delivery co-ordination with neighbouring sites Wi9 and Wi10. Active frontage isn't necessarily shopping so it is not proposed to amend this. The council is proposing a Main Modification to Merton's Local Plan on tall buildings to bring Merton's Local Plan into general conformity with the London Plan. This Main Modification introduces a Strategic Heights Diagram within Policy D12.6 "tall buildings" which defines an approach to taller buildings in Wimbledon town centre based on the heights identified in the FutureWimbledon SPD 2020. The FutureWimbledon SPD was subject to extensive public consultation and is based on a thorough analysis of the area. This sets a height of 8-10 storeys for this site allocation. The "infrastructure requirements" section of this site allocation make extensive reference to Thames Water's requirement for drainage upgrades.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi15	<p>P313Site Wi 15The YMCA site, Broadway It is noted that a planning permission for redevelopment has already been granted by the Council. Should this not be proceeded with, then the design guidance should be amended to include: "Any redevelopment proposals should aim to reduce the height of the existing buildings, to lessen the visual impact on the residential properties to the north. Given that the northern footway in the Broadway is in almost permanent shadow in winter months, a planted and south-facing set back space could benefit the street scene. As the properties along Trinity Road are set back from the frontage, the scale of the street would benefit from a similar setting back on the YMCA side, with the height of the frontage matching its neighbours to the north and east." The reference to taller buildings being acceptable should be removed, as this adversely affects the residential properties to the north.</p>	<p>No further change proposed. Planning permission (20/P1738) has been granted by the council</p>

61	Wimbledon Society Planning Committee	09 Wimbledon	Wi16		<p>P316Site Wi 16Centre Court Shopping Centre This Shopping Centre was built in the 1980's, and to describe it as a brownfield site is not credible. The first sentence should instead read: " The demolition of such a recently built structure is considered wasteful of resources, and instead of redevelopment, adaptation should be promoted". Additionally: "Any development should take account of the zero carbon targets, and as set out in P42 above, calculations of projected carbon emissions should include not only those from the construction of the new project, but also those arising from any demolition". This reference and the whole first sentence (the site provides an excellent opportunity.....) should therefore be removed. The reference to the Listed buildings and Conservation area is totally inadequate and needs strengthening, as follows: "A substantial portion of the site lies within the Wimbledon Broadway Conservation area, which also includes the frontages of the opposing properties in both Queens Rad and the Broadway. The site contains two Listed Buildings: The Old Town Hall and the Old Fire Station, both vacated in the 1980's. The Town Hall facades are arguably the very best in the whole town. The 1980's development regrettably removed the whole of the fine interior of the Town Hall, with its fine marble stair, panelling and committee rooms. What was left was a shell, which had at least a range of boutique shops at ground floor level. These were subsequently removed and replaced by a supermarket. This fine 1930's building has been treated internally with minimal respect, and its potential needs to be rediscovered. Accordingly Add: "Any development proposals should utilise the ground floor of the Old Town Hall in a way which respects and enhances the nature of the interior of this fine listed building. The opportunity exists to utilise this ground floor for community use, providing local services and acting as centre for local information, for driving the retrofitting programme, for involving local people in the future planning and management of the town itself. (see also site Wi 9 above)." The potential for new development over the station tracks suggests that connection of the upper pedestrian Mall across to such a development could be advantageous. Accordingly: "The potential for connecting the upper pedestrian mall level to a future development above the rail tracks and station should be considered". The current building includes a ramp that was designed to form the approach to a new road bridge across the railway. Today's reliance on a single main road bridge in the town is inherently risky, and the existing structure is said to be less than ideal. The introduction of a second bridge has been a Policy intention of the Council in past Plans. Accordingly, the importance of ensuring that this crossing of the tracks is safeguarded is paramount. Although the timing of the Crossrail 2 project is not yet understood, a bridge in this location has been included in all the project's design concept drawings.</p>	<p>An additional modification has been proposed to the "design and accessibility guidance" to say "This site provides an excellent opportunity for the repurposing and redevelopment of a substantial brownfield site in the heart of the town centre" to reflect both this representation and the representation by the site owners who wish to conserve and repurpose part of the building. Centre Court shopping centre is previously developed land and the current structure is 30 years old. An additional modification is proposed to the "design and accessibility guidance " to add "the Broadway Conservation Area design guide and design considerations relating to the two Grade II listed buildings on site" which will provide greater clarity. In the light of the withdrawal of funding for Crossrail2 and the uncertainty as to whether its future development will be justified and the greater emphasis on active travel, a Main Modification 9.2 has been proposed to Site Wi16 to remove reference to a road bridge as this is not deliverable in the absence of Crossrail2.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi3		<p>Pp 276 & 282 Chapter 9: Wimbledon, Site Allocation Wi 3 (AELTC) – there is a mismatch of the area covered between the overall site allocation map on page 276, which excludes the Wimbledon Park Golf Club land, and the detailed map under Site Allocation Wi3 on P 282 which includes both the Golf Club land and the Wimbledon Club's land. P 283Similarly, the detail of Site Owner only shows AELTC whereas, if the Wimbledon Club's land is to be included in Site Allocation Wi 3, it should also list them as well.</p>	<p>An additional amendment has been proposed to clarify that the summary of Wimbledon sites illustrated in a map on page 276 held the incorrect map allocation for Wi3 and that the map shown within the allocation on page 282 was correct. This map excludes the Wimbledon Club and so the Wimbledon Club aren't listed as landowners.</p>
61	Wimbledon Society Planning Committee	09 Wimbledon	Wi8		<p>Pp 295-297Chapter 9: Wimbledon, Site Allocation Wi8 (South Wimbledon Station) – should now be listed & numbered under "South Wimbledon".</p>	<p>An additional amendment has been proposed to the maps within Chapter 7 South Wimbledon to refer to Wi8 (south Wimbledon station) but at this time it is not proposed to move the allocation within this chapter.</p>
61	Wimbledon Society Planning Committee	10 Health and Wellbeing	HW10.1	319	<p>P 319 10.1.21Air Quality Even if developers are persuaded to build in such a way that their project does not worsen air quality, as explained above, the great majority of the Borough is already built, and air quality standards remain poor. This is particularly where major pedestrian concentrations and shopping centres are affected by traffic fumes. Waiting for electric vehicles to solve the problem should not be an option. No matter how many students and parents are persuaded to adopt sustainable travel options, poor and unhealthy air quality will remain (10.1.21). The Merton figure for particulate air pollution has climbed to 5.3 compared to the England average of 4.7, and transport locally accounts for 57% of NO2 (with domestic gas being 18%). Nitrogen Dioxide (NO2) standards are not met in many of the Borough's major roads and junctions, nor in centres like Wimbledon Broadway, South Wimbledon, Morden, Colliers Wood, Wimbledon Village. (Merton Air Quality Plan 2017 – 22). Suggest Add: "Removing or limiting or removing traffic in such areas of high pedestrian concentration could deliver better air quality for people, as well as improve the quality of life in the centres themselves". The re-routing of HGV's is indeed being proposed in the LBM Air Quality Action Plan, which can help. Which is why pedestrianisation and traffic re-routing is being suggested in N7.1, N9.1 above.</p>	<p>No further change proposed. While limiting private vehicle and delivery travel by polluting vehicles would benefit air quality, it may be detrimental to the functioning of a centre, particularly if deliveries were further restricted. Merton's local plan policies encourage travel by walking and cycling and many of Merton's town centres are easily accessible by train, tube, bus and , sometimes, tram. Merton's town centres are also all located on A-roads and there are no proposals to reclassify additional road space as A-roads to take additional traffic</p>
61	Wimbledon Society Planning Committee	11 Housing	H11.1		<p>H11.1Whilst the proportion of housing tenures in private development is being set, it is not often complied with in practice. Where the Council itself is the site owner, and the imperative is that the site be developed in the public interest rather than for profit, then the social housing component should be achieved as a minimum, and space for Self-build should be included. The latter is being currently promoted by HMG, and Councils are required to identify suitable sites. Add new policy K: " Where the Council is itself the owner of a site, the social housing component will be adopted as a minimum, and space will be provided for Self-build housing". Without the necessary resources it has not been possible for the Society to assess the environmental and other implications of the proposed housing increases in sufficient detail to offer comment.</p>	<p>Noted. No further change proposed. The requirements concerning affordable housing provision requirements on publicly owned land, set out in policy H.11.1(f) and the provision of Self Build is are in conformity with the London Plan and are informed and aim to contribute to meeting local housing needs set out in Merton's SHNA. Merton have worked closely with the GLA in preparing this policy and the GLA have formally confirmed that policy H11.1 is in conformity with the London Plan.</p>
61	Wimbledon Society Planning Committee	11 Housing	H11.7		<p>Proposed Policy A indicates that B2R must be for a minimum of 50 homes. The justification refers to the relevant London Plan policy, but it is not explained why this threshold is required. Given the housing shortage, there does not appear to be any good reason why the building of rented housing on small sites needs to be prevented by Planning Policy. This Policy should be omitted.</p>	<p>Noted. No further change proposed. Given the borough's limited land availability and the significant need for a good range and mix of housing types and tenures to sustain and promote mixed and inclusive communities, it is considered appropriate and reasonable to adopt the London Plan minimum of 50 homes. The Mayor's Affordable Housing and Viability SPG (2017) includes specific guidance on Build to Rent and (footnote 34) states: <i>LPA's may set their own thresholds to reflect local housing market circumstances and affordable housing need. However, it is important that where a lower threshold is set Build to Rent schemes operate according to the stipulations in this guidance in order to qualify for the Built to Rent pathway.</i> It is considered that there are no unique local housing market circumstances setting Merton apart from the London region, that would justify Merton setting its own thresholds.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.1		<p>Policy D 12.1 A significant planning and design requirement is respect for, not just the scale and character of the local neighbourhood, but the amenities of neighbouring property and occupants. This translates for example into protecting the privacy of the back gardens, preventing overlooking, ensuring good daylighting to not just windows, but also the rear gardens. Such respect and protection is achievable via the planning system, so that aggressive (or perhaps thoughtless) development is constrained. "The market has no morality" (M Heseltine 2021) Many developments engender needless objections from neighbours simply because the design fails to comply with sensible neighbour protection standards. Current experience is that the development industry does not understand this, unless planning policy and guidance is clear. So important is this element that an additional policy should be placed at "C": "C : Ensure that the design meets the Council's standards of privacy, overlooking, daylighting and sunlighting to neighbouring property and land. (See also policy CC2.4 above).</p>	<p>The policy wording has been reviewed and no further action has been taken. Policy D12.3.f 'Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens' highlights the importance of protecting the quality of neighbouring amenity spaces.</p>

61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.2	381	<p>P 381 Policy D 12.2 Trees</p> <p>The requirement by the London Mayor is that the Borough plants many hundreds of trees each year for 20 or more years. The Council has a programme of tree planting in the highway, and in Council-owned lands and open spaces, although not it seems up to the level set by the London Mayor. Many trees are of course felled without any kind of Council intervention or knowledge, being not covered by Tree Preservation Orders, nor being in Conservation Areas.</p> <p>Tree cover is much less dense in the east of the Borough.</p> <p>In new developments, the 'one for one' replacement of mature lost trees by saplings is clearly not 'like for like'. The result is more public objection, more delays, and an overall reduction in nature, and a loss to the local environment and townscape.</p> <p>The Plan therefore should now contain clear proposals to improve and increase the tree stock.</p> <p>Accordingly, an addition to 'Y' should be:</p> <p>"The Council will undertake a tree planting programme in the streets and Council-owned open spaces of (a figure to be decided, but being well into the hundreds) each year.</p> <p>"Additionally, the Council will publicise schemes that provide householders with 'free' trees to plant in their own gardens.</p> <p>"In new development, the retention and protection of existing trees and root systems is a priority.</p> <p>"If any trees are to be lost, then their replacement should be calculated on a "tree-years" basis.</p> <p>"The combined ages of the lost trees should be matched by the combined ages of the replacements, calculated on the following basis:</p> <ul style="list-style-type: none"> · for specimen/veteran trees eg Oaks, Cypress etc, or TPO trees, then lost years x 3: · for other trees in Conservation Areas, then lost years x 2: · for all other trees then lost years plus 50%. (See also Policy 15.4 page 517) <p>"If the development site is not able to accommodate the new trees, then the surplus should be passed to the Council for planting on other sites."</p>	<p>Policy D12.2 sets out Urban Design policies. Policy D12.2y sets out that development should maximise green infrastructure on site through urban greening. This can include tree planting.</p> <p>Further policies on the Protection of Trees are contained in Policy O15.4.</p> <p>No further changes are recommended to Policy D12.2.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.2	381	<p>P381 Policy D 12.2 Maximising greenery</p> <p>Policy 'Y' refers to 'Urban Greening' which is welcomed.</p> <p>However, much new development has a high site coverage, so restricting the amount of building and hard surfacing can maintain green-ness to some extent.</p> <p>Accordingly, add policy at 'Z' :</p> <p>"New development should maintain at least half of its site area as unbuilt, unpaved and green, to provide space for nature. In housing terraces, front gardens should aim to be at least one third green: in semi detached or detached houses the proportion should be at least half.</p> <p>If access for cars is required, then a single entry from the street would allow more of the garden to be kept green, and reduce the number of crossovers. (A simple one page design guide would help).</p> <p>The use of green roofs and green walls should be encouraged". (See also P395 12.3.22)</p>	<p>Policy D12.2(y) makes reference to the Green Infrastructure policies in the Local Plan. Policy O15.5 Urban Greening provides details on how development will be required to meet the London Plan Urban Greening Factor assessment.</p> <p>Officers do not recommend any changes.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.3		<p>P397 12.3.32Single Aspect Dwellings</p> <p>As written, this policy allows developers to construct single aspect dwellings, with minimal restriction: this should not be accepted.</p> <p>Not only lack of natural and substantial cross ventilation, but for the occupant there is no opportunity to move away from what might be an intrusive or noisy situation.</p> <p>Instead, 12.3.32 should be re-written:</p> <p>"New single aspect dwellings are inherently unsatisfactory, with a lack of natural and substantial ventilation, and very limiting to the occupants in their daily lives. They are not considered suitable for urban living".</p>	<p>The policy wording has been reviewed and amendments have been made.</p> <p>It is important that all future housing developments provide high quality homes. Dual aspect homes have many benefits and should be maximised. There are some circumstances where single aspect homes cannot be omitted, and if so the policy wording states that these homes must demonstrate that they are still of a high quality. However, the wording of policy D12.3.z has been amended to take a stronger position against single aspect homes to ensure that future applicants are fully aware of Merton's position on providing them.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.4		<p>P399 Policy D 12.4Alterations to Existing Buildings</p> <p>Many objections by neighbours to proposals are based on what are seen as adverse effects or intrusions. Ensuring that new extensions do not unreasonably diminish the natural daylight and sunlight and privacy to adjoining gardens is essential.</p> <p>Add to "L": "does not significantly impact the Daylighting, Sunlighting and Privacy of neighbouring Gardens and buildings."</p>	<p>The policy wording has been reviewed and no further action has been taken.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.5		<p>P402 Policy D12.5 Managing Heritage Assets</p> <p>"E"Should be amended to read (as we have Historic Landscapes in the Borough):</p> <p>"The loss of a building or landscape that makes a positive contribution to a conservation area....."</p> <p>Additionally: The enhancement of heritage assets has been implicit in past HMG Circulars and in the NPPF, and the powers exist for Councils to set up heritage grant schemes to aid householders and others to improve their property.</p> <p>Past schemes elsewhere have generated up to twelve times the private funding that has come from the simple Council grant. CIL funding is potentially available, and such a scheme would give the Council a creative and positive role in driving forward enhancements.</p> <p>This positive approach can be a welcome balance to the more normal regulatory and sometimes necessarily restrictive approach to "Heritage" by the planning system.</p> <p>Accordingly, an additional policy paragraphs should be added at "H":</p> <p>"H: Subject to the resources becoming available, the Council will operate a Heritage Grant scheme funded via the CIL, to encourage householders to improve the exterior of their property."</p>	<p>No change proposed. The change proposed is not required to make the plan sound.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.5		<p>P405 12.5.6Types of Heritage Assets</p> <p>In the list of Heritage assets, some are classed as "designated" and some as "undesignated".</p> <p>There does not appear to be any reasoning for this irrelevant distinction. They are by definition all "designated".</p> <p>OMIT references to designations.</p>	<p>The justification wording has been reviewed and amendments have been made.</p> <p>Amendments have been made to better describe what is designated and non-designated heritage assets. It has not been omitted to reflect Historic England's categorisation of designated and non-designated heritage assets.</p>
61	Wimbledon Society Planning Committee	12 Places and Spaces in a growing borough	D12.6		<p>P408 Policy D 12.6Tall Buildings</p> <p>The Council's phrase that "It will generally support" should not be accepted. It gives the wrong emphasis. Only if the promoters meet stringent criteria should they be accepted.</p> <p>The Society view is that such "written policy" criteria (which have been used across London for many years) have been ineffectual in ensuring that high buildings are located satisfactorily.</p> <p>However, if the Council wishes to take this approach, then instead the text should read (line 15): "There will be a general presumption against tall buildings. The Council will only support tall buildings where:....."</p> <p>On "P" tall buildings are not considered appropriate in Wimbledon Town Centre and this reference should be removed.</p> <p>P41112.6.2Recent studies have shown that taller buildings are less energy efficient than those around 4/5 storeys (see Smith & Gordon 2020: and UCL Shimitzu & Others 2020).</p>	<p>The policy has been reviewed and amendments have been made.</p> <p>Policy D12.6 has been adjusted to be in conformity with London Plan as per our Statement of Common Ground with the GLA.</p> <p>Additional 'Strategic Heights Diagrams' have been included that highlight an approach to areas appropriate for taller buildings within Colliers Wood, Morden and Wimbledon.</p> <p>The policy has been amended to provide specific locations where tall buildings will be acceptable.</p>
61	Wimbledon Society Planning Committee	13 Economy and town centres	TC13.5	455	<p>P455Local Town Centres</p> <p>(ii) the proposal to prevent the amalgamation of frontages in Wimbledon Village is strongly supported, as this will ensure both that there will be a wider variety of activities, and also that smaller businesses will be able to afford to continue.</p> <p>The same approach should be considered in the two Town Centre Conservation Areas, where the current properties have (conveniently) narrow frontages.</p> <p>Accordingly it is suggested that (ii) be revised, also removing the reference to "existing", as this could also apply to new development should this take place.</p> <p>Amend to read: "Supporting proposals that do not amalgamate ground floor shopping frontages in Wimbledon Village and in the two conservation areas in the Town Centre, so as to result in"</p>	<p>No further change proposed. Wimbledon town centre's economic and social characteristics are different from Wimbledon Village. Some minor amalgamation of shop units has already taken place at Wimbledon Broadway (and reversion to separate shop units) without detriment to the town centre.</p>
61	Wimbledon Society Planning Committee	13 Economy and town centres	TC13.9	476	<p>P476Policy TC 13.9Culture, Arts, Tourism</p> <p>A (iii)Suggest add: "Providing for new arts and culture facilities in the Council's own develop-ment site in Wimbledon Broadway Car Park beside the Theatre (See comments on site Wi 2)."</p>	<p>No further change proposed. The site allocation already includes community and culture</p>
61	Wimbledon Society Planning Committee	14 Infrastructure	IN14.1	414	<p>P414 D12.8 Digital Infrastructure</p> <p>Telecommunications applications generate much opposition, both on alleged health and on amenity grounds. There is no co-ordinated plan, each application being submitted seemingly ad hoc.</p> <p>No-one knows whether mast sharing is happening, not how many there will be.</p> <p>And the masts are accompanied by up to five differently "designed" metal cabinets at their base, which even politely can only be described as a shambolic mess, a blot on the landscape, as well as an obstruction to the footway.</p> <p>The Council's suggested "waiting for the next application" approach will do nothing to stem this flow. Instead, the Council could, with the various operators, produce a telecom plan for the Borough, with rationalised siting, mast sharing, a totally different approach resolving the cabinet mess, removal of obsolete equipment.</p> <p>Suggest Add at "A": " The Council will work with the various telecom operators to produce an overall telecom plan for the Borough, promoting mast sharing, cabinet rationalising, improved design standards, and removal of surplus telecom equipment".</p>	<p>Policy IN14.1 provides details on the provision and support for digital infrastructure. As these facilities are provided and managed privately, it is not appropriate for the Council to determine specific locations, although the Local Plan does encourage the provision of digital infrastructure that does not unacceptably damage visual amenity. The London Plan Policy SI6 also provides details of requirements for Digital Infrastructure in London.</p> <p>Officers do not recommend any changes.</p>

61	Wimbledon Society Planning Committee	14 Infrastructure	IN14.1	486	P486 14.1.26 Gas and Electricity Given the exceptional importance of maintaining and protecting the electricity supply system, it would be desirable to Add: ".....and disruption. The vulnerability to flooding of the existing installations at Plough Lane and the Burlington Road junction justify concern, and the need for exceptional resilience".	Policy IN14.1 identifies that dialogue between utility and service providers is encouraged, which would include between electricity and water providers. Officers do not recommend any changes.
61	Wimbledon Society Planning Committee	15 Green and Blue infrastructure	O15.1	506	P506 Policy O 15.2 Open Space and green infrastructure (A): The use of the phrase "inappropriate development" allows developers to claim that their development is appropriate, and should not be accepted. Instead: at "A" it should read: "Protect (etc etc) designated open spaces from all development in accordance...." (B i): The suggestion that a (biased?) assessment can show open land to be surplus is clearly able to be manipulated by developers. The primacy in the Plan of maintaining all designated open land as unbuilt should be paramount. Accordingly, paragraph B I should be removed altogether. (C): The suggestion that open space can be lost subject these 'design' criteria is again an open door for developers to argue that their scheme is "well designed", and that the open space can be built on. Any 'design' issues can be resolved by reference to the relevant design policies elsewhere in the Plan. Accordingly Paragraph C should be removed entirely	Policy O15.2 has been prepared in line with the NPPF and London Plan requirements for Open Space. Officers do not recommend any changes.
61	Wimbledon Society Planning Committee	15 Green and Blue infrastructure	O15.1	504	P504 Policy O15.1 Open Space and Nature With the increased likelihood of storms and flash flooding, the ability of existing watercourses to hold increased flows is limited. Accordingly, in order to lessen the flooding events, providing run-off holding areas, opening out some currently culverted streams and other measures may be beneficial. Add therefore after F: ".....whilst protecting its biodiversity value. To help alleviate some of the potential flooding issues, run-off holding areas (eg see site RP3) will be sought beside streams, and some streams that are currently culverted may be opened out". Some areas may benefit from creative informal planting by local groups, sometimes styled 'Guerilla Gardening'. This is already in place with the Council's Climate Change "greening" Group: Suggest Add after 'H': ".....The Council will give support to local groups to undertake planting and upgrading of areas that improve the local landscape	F. This is covered in the flooding policies F15.7, F15.8 and F15.9. Officers do not recommend any changes to Policy O15.1. J. While the council may be supportive of improvements to local landscapes by residents, this is not a planning consideration unless it forms part of a planning application. Officers do not recommend any changes.
61	Wimbledon Society Planning Committee	15 Green and Blue infrastructure	O15.2	507	P507 15.2.5 MOL and development Again the use of "inappropriate" leaves the door open to developers to argue that their new building on the MOL is appropriate. Accordingly, the phrase should be amended to read: "MOL will continue to be protected from all development, in accordance with....."	Policy O15.2 and para 15.2.5 have been prepared in line with the NPPF and London Plan requirements for MOL. Officers do not recommend any changes.
61	Wimbledon Society Planning Committee	15 Green and Blue infrastructure	O15.3	511	P511 Policy O 15.3 Biodiversity and Nature Again, as noted above, item "A" should be amended to say: "Protect all sites of recognised nature conservation interest from all development that will adversely affect" Green corridors are only partially mapped in the Plan (see note on Appendix), and it would help to develop their definition further. Also, the Council should aim to resolve or connect up the missing links, through local site initiatives and planning briefs. Accordingly, item (C) should be amended to read: "C: (The Council will) Identify the principal Green Corridors throughout the Borough, and will promote the filling in of any significant gaps via local agreements or planning briefs."	15.3(a) - The draft policy is in line with the NPPF and London Plan. Officers do not recommend further changes. Appendix - Officers have checked the Green Corridors maps and the tables in the Appendices. Green Corridors often cover wide areas and therefore not every single site that falls within a Green Corridor will be listed in the Appendix. There are no errors and therefore no further changes are recommended. 15.3(c) - This is covered by policy O15.3(f) which requires development on sites in an area of deficiency in access to nature to incorporate biodiversity and habitat features to improve nature conservation. Officers do not recommend any changes.
61	Wimbledon Society Planning Committee	15 Green and blue infrastructure	O15.4		P517 Policy O 15.4 Tree Protection This subject has already been covered in page 381, Policy D 12.2, which could be repeated here. Essentially, the approach should be: (a) the Council should continue to plant trees in the public highway and on Council-owned land; and (b) A "Tree Years" replacement approach should be used for any trees lost to development. The use of "equivalent financial value" (E) or the CAVAT financial calculation (15.4.11) is more suited to the Magistrates Court when assessing damages etc, and is very cumbersome in use. The Tree Years system is far simpler, easier to understand, and easier to adjust to the scale of the loss (where Oaks are valued more than Sycamores etc). The texts should be modified accordingly to remove references to CAVAT etc.	Officers have reviewed this policy and the suggested wording and make the following comments: a. This falls outside of the Local Plan and is a consideration for the Council's Climate Action Plan and Greenspaces team. b. The policy is in line with London Plan G7 which identifies valuation systems to be used if a tree replacement is required. No further changes are recommended.
61	Wimbledon Society Planning Committee	15 Green and blue infrastructure	F15.7		P529 Policy F 15.7 Flood Risk and Sustainable Drainage With what seems to be agreed as the greater expectation of flooding in coming years, merely "steering" development away from flood prone zones is not considered sufficient. Instead the Plan should be clear that vulnerable development in high flood risk areas is not compatible with prudent planning. Instead the Plan should clearly identify the areas of high risk, and then set out Policy that effectively embargoes new build of vulnerable uses. The Policy should be rewritten accordingly. Additionally, there should be a programme of measures for protecting vulnerable uses and buildings that already exist in high flood risk areas. (See also the comments on P233 site RP 3).	The policy direction is in line with government and Environment Agency guidance and is supported by the Strategic Flood Risk Assessment (SFRA).
61	Wimbledon Society Planning Committee	15 Green and blue infrastructure	P15.10		P544 Policy P 15.10 Air Quality This subject has been covered previously (see P319 10.1.21) and it would be desirable to combine them and lessen repetition.	Officers have reviewed the text and these two paragraphs differ and should not be combined - one covers the context of health and the other the context of development
61	Wimbledon Society Planning Committee	15 Green and blue infrastructure	O15.6	526	(F) P 526 Chapter 15: Green & Blue Infrastructure, Para 15.6.12 replicates most of Para 15.6.10 & should be deleted & subsequent paras renumbered	Officers have reviewed and agree that this paragraph contains repetition and that it should be deleted.
61	Wimbledon Society Planning Committee	16 Sustainable travel	T16.1		P558 Policy T 16.1 Sustainable Travel The single most important element, or component, or 'user' of transport has to be the Pedestrian. Currently the pedestrian is in most cases only allowed to have the space that is not required for vehicles, and this cannot now be right. Proposals for Pedestrian zones in town centres, where there should be major 'people-focussed' spaces for civilised interaction and enjoyment, are conspicuous by their absence in this Plan. Through traffic brings nothing to a centre except noise, fumes, danger. Hundreds of towns in Europe (including the UK of course) have pedestrianised and re-energised and humanised parts of their centres with success since the 1970's reports of failures are conspicuous by their absence. A rebalancing of the space allocated to the wheel and the foot is overdue if towns are to thrive. Secondly, the public transport system should be prioritised, so that it becomes a reliable, convenient and interactive public service, available for all. Linkages between rail and bus for example need to be seamless, weather proofed with linked timetables, but are currently often inconvenient and haphazard. The suggested four points are 'worthy' but seem to lack a sense of real direction and strategy. Their sentiments would be best subsumed into the general body of the text, and replaced with: Prioritise the Pedestrian over vehicles, with an emphasis in town centres: then Create a coherent public transport network, properly linking the rail and bus and cycle systems: Progressively remove damaging through traffic from local streets: Encourage take-up of zero emission vehicles: Restrict accessibility to polluting vehicles. The action points (a-f) should include further development of the Council's good recent work on School Streets, also on Low Traffic Neighbourhoods, and implementing in stages the proposed upgraded cycle network. Other points have already been covered earlier in the document, and need to be shown on this "to-do" list: eg the CR2 project (see 17.5.8), future rail bridges (see P316 site Wi 16). Town and other centres need to be freed from traffic dominance, polluting vehicles need to be progressively excluded from sensitive areas, where pedestrians congregate or where there are vulnerable users eg schools. So Add: GDevelop and extend the School Streets and Low Traffic Neighbourhood projects, working closely with local interests in the creation and evolving of schemes beforehand: HImplementing the cycle lanes and priorities set out in the cycle network plan, and concentrating on significant major links, where cyclists are currently unprotected:	Comments noted. Wording of policy T16.1 e has been amended to clarify the intention of the policy to "reduce traffic dominance". Policy on reducing traffic dominance in Wimbledon also added to policy N9.1. Policy T6.1 is a strategic policy and provides an effective framework for the potential delivery of the proposed additional points. Merton's Transport Strategy sets out a more detailed delivery programme.
61	Wimbledon Society Planning Committee	16 Sustainable travel	T16.1		P560 16.1.1 Transport Challenges The reference to 'congestion' would benefit from an additional sentence that in effect said that (as has been known since the Buchanan Report of 1963) that traffic expands (and contracts) to fill the road space available.	Comment noted. No change proposed.

61	Wimbledon Society Planning Committee	16 Sustainable travel	T16.1		P56216.1.9Delivery vehicles The Plan is right to highlight the recent growth in delivery vehicles. If (as is hoped) the creation of more pedestrianised areas in town centres proceeds, then deliveries to local premises will need to be provided for in different ways. Which can be done, but may need special and tailored solutions. So Suggest Add: "Introducing new Pedestrianised areas will generate a need to tailor new ways of providing for deliveries to local businesses".	Comment noted. No change proposed. The proposed policy and supporting text is considered to be effective in achieving the outcome proposed in relation to managing deliveries. Policy paragraph (l) on managing deliveries specifically in Wimbledon added to policy N9.1
61	Wimbledon Society Planning Committee	16 Sustainable travel	T16.5		P578Policy T 16.5Transport Infrastructure The five policy points tend towards relying on others (developers) to "do the right thing" by ensuring that their proposals can be made acceptable. What seems lacking is a sense of "what positively needs to be improved". Actively preparing for the introduction of CR2, with the need to protect land so that it can be built; (this is largely covered by point B): Making proposals (not waiting for them) that will begin to join up the rail and bus and cycle networks to meet the sort of far higher performance standard, that people have seen elsewhere. Point C relies on others to meet the present (low?) standards, but there needs to be action by the Council with TfL etc to improve the system when no developer is involved locally. One should now be seeing the working out of the implications for the progressive introduction of pedestrianisation in town centres. So suggest Add: "FProduce proposals with TfL for a programme of much improved linking of rail, bus and cycle networks at stations: GImplement a phased programme of pedestrianisation, and the re-routing of through traffic away from both Wimbledon Town Centre, and of South Wimbledon."	No change proposed. Policy T16.5 aims to safeguard transport provision as part of development proposals and is in accordance with policy T3 of the London Plan. Scheme TN9 proposes a "major scheme to improve the public realm and accessibility by cycling, walking and public transport, including improvements to the station. Will involve modification of one-way road system, reallocation of road space and schemes for sustainable management of deliveries and servicing". Strategic policy T16.1d sets out that the Council will " Work with TfL (Transport for London) and Transport Operators to promote and seek improvements to public transport infrastructure and services."
61	Wimbledon Society Planning Committee	16 Sustainable travel	T16.1		P580Table 16.1List of Transport Schemes This Table should have additional items: suggested are: *TN15Land safeguarding for Queen's Road to Alexandra Road bridge (see Site Wi 16) TN16Land safeguarding for replacement bridge Broadway/Wimbledon Hill Road TN17Land safeguarding for level crossing works (see Site RP3) TN18Land safeguarding for possible relocation of Raynes Park Station TN19Semi pedestrianisation works in the western arm of the Wimbledon Village High Street TN20Through traffic deviation works at Hartfield Road as the first stage of traffic reduction and pedestrian improvements in Wimbledon Broadway"	No changes made
61	Wimbledon Society Planning Committee	17 Appendices			P613Listed Buildings Eagle House is graded 2 star, and the Railings etc are grade 2. This needs to be added. P61931B St Mary's Road: the Peter Foggo house is grade 2.This needs to be added.	Additional modifications proposed to recognise Eagle House as Grade II*, the Eagle house railings as Grade II. 31b St Mary's road is already recognised as a Grade II listed building.
61	Wimbledon Society Planning Committee	17 Appendices			P663Definitions: Town Centre It would be desirable to recognise that a town centre is not simply a prosaic "place to shop". Suggest Add at the start of the definition. "A Town Centre acts as the heart of a community, a place that gives local identity and focus to the local people. "It often has a great variety of uses and activities, not just shops, but workplaces, community and social and public services, and may have a transport hub. "The boundaries of the various centres are shown on Merton's Policies Map." (etc)	No further change proposed. We agree that town centres are far more than places to shop. Merton's policies, particularly TC13.5 "merton's town centres and neighbourhood parades" are clear that town centres are the focus for social activity and this is partly a reason for the relative success of some of Merton's town centres (see paragraphs 13.5.5 to 13.5.7). However the NPPF 2021 still focussed the definition of town centres very much on retailing (which was not amended in the recent move from the NPPF 2019 to the NPPF 2021) and this has to be recognised in the definition in Merton's local plan to make it consistent with national policy
61	Wimbledon Society Planning Committee	17 Appendices			P 618Appendices – Drinking Fountain & Castle/Horse Trough, Parkside SW19 - Cattle not Castle.	Additional modification to correct spelling
61	Wimbledon Society Planning Committee	Policies Map	MOL		P585 List of Metropolitan Open Lands The Council could request the GLA to consider designating Morden Hall Park (M001) as an MOL. Does the Map of MOL and Open Spaces in the Appendix already show it as included	Morden Hall Park is currently designated as MOL, within the Wandle Valley MOL site. These are shown on the Policies Map and in the Appendix. No changes needed.
61	Wimbledon Society Planning Committee	Policies Map	SINC		P600 Local Sites for Nature Conservation The Council could consider adding Rookwood Open Space/Beverley Brook (M007) to the list	Beverley Brook is currently a SINC and is listed on page 599. Rookwood Open Space has changed as a result of a planning application and is not considered suitable as a SINC. This may be reviewed in future plans. No changes needed.
61	Wimbledon Society Planning Committee	Policies Map	Green Corridors		Green Infrastructure Policies Map 3: Green Corridors This map defines certain open spaces and links, but an understanding of green corridor linkages might be developed further. For example the many thousands of back gardens in the Borough form a whole series of linkages for nature to 'travel' along. Would a map that illustrates this, show where there were very abrupt breaks that needed attention'	The Green Corridors Policies Map illustrates areas throughout the borough that have been assessed and meet the Green Corridor criteria, as set out in the Green Infrastructure Study 2020. Further information can be found in the Green Infrastructure Study on the Council's Local Plan Research webpage. No changes needed.
61	Wimbledon Society Planning Committee	Policies Map			Heritage Map 3: Listed buildings and Conservation Areas It would be helpful to have a list of the Conservation Areas in the margin, with their reference number placed on the map, perhaps in different colours	Officers have reviewed and agree with the suggestion. Changes have been made to the policies map with area codes.
61	Wimbledon Society Planning Committee	Policies Map			Multiple Deprivation Map This vitally important map should have a clear explanation of the meaning of the various values/colours in the key panel. And a cross reference to the Plan text.	Officers have reviewed this map and consider that it is best to remove it from the plan. This map is available online through the GLA data store and is continually updated there. To avoid publishing a map that will be continually superseded, it is best to delete it.
61	Wimbledon Society Planning Committee	Policies Map			20 Minute Neighbourhood Map This has been presumably constructed using an "800m from the edge of the defined centre". It would be interesting to see the alternative "isochron" map that defined the edges by the 'true walking distance, ie measured along roads/paths rather than 'as the crow flies'. It is likely that the boundaries will contract somewhat, and may possibly indicate some shortfall	The 800m buffer approach used concurs with the definition of 20-minute walking distance and is what the GLA used for the London Plan. An Isochrone map would look similar to what we have shown. No changes required.
61	Wimbledon Society Planning Committee	Policies Map			Cycle Network Map A companion map would be useful, showing the current 'status' of each link. For example, there would be some cyclepaths classed as safe and entirely segregated from vehicles today: others where the cyclepaths were of good standard but were beside vehicles, others where the standards were lower and so on. And there would be some that would be classed as totally unsatisfactory. From this kind of information one could see what progress needed to be made, and which routes were candidates for improvement.	No further change proposed at this time. The cycle map sets out the cycle route infrastructure that the council proposes to be in place by 2040. Some of these cycle routes currently exist but are likely to need upgrading within the lifetime of this plan. By including all the routes on one map, this map will not have to be constantly updated to reflect the condition and status (good standard, poor standard etc) of each section of route. This is more appropriate for a cycling strategy outside the planning system.)
61	Wimbledon Society Planning Committee	Policies Map			Proposed Public Transport Map This should also include safeguarding land for projects listed above in 16.1.	Safeguarding land is already included in the Stage 3 consultation Policies Maps.
61	Wimbledon Society Planning Committee	N/A			The Council is to be commended for managing to produce a plan in what must have been very difficult working conditions in these 'Covid' times. The Society has contributed in some detail to the Council's earlier consultation drafts. In our comments on the January 2021 version we said that "we feel that the overall thrust of the Plan needs to be re-focussed to deal with the Climate Emergency, and not on 'Growth' – which is only another word for 'Development'. Generally, this is still our view. What we now have before us is mostly the traditional Development Control-centred plan. It defines how the Council will respond to proposals from developers. Whilst there are references to the changes that are emerging as a result of society's responses to the pandemic, and to Climate Change, this has not been sufficiently reflected in the ideas behind the Plan. New development will change only perhaps 5 – 10% of the Borough's building stock by 2050, so the 90-95% of today's standing buildings will still be around then. There is not enough understanding of the role of the Council in promoting and running the retrofit of most of today's buildings, to meet Climate Change challenges. Where is the re-thinking of transport? Pedestrians in our town centres still have just "the space left over after traffic", with noise, traffic danger, fumes (at a level that fail to meet the set standards). There are proposals for cosmetic paving and planting, but the Council's imaginative approach in recently establishing school streets for example, is not matched by creative thinking and proposals around pedestrianised space and cycling. The operative word is proposals: slogans and policies are all very well, but we feel that we should move on from the old style rather static plan, and have a more proactive and imaginative approach. There is also no real anticipation of the quite major changes to the operation of the Development Control system that are being promoted by central government (HMG) with Design Codes (NMDC). These are to be "Sets of graphic instructions for building a place". (Brodsky 9/21) Their scope covers primarily building context, building form, nature, daylight etc, and designing to avoid later retrofit. (Brodsky 9/21)	We thank the Wimbledon Society Planning Committee for their contributions to earlier consultation drafts. The climate action plan recognises that retrofitting existing buildings is one of the greatest challenges and this local plan seeks to avoid further retrofit by ensuring that climate targets are aligned with being able to reach net zero in 2050 without having to further retrofit the buildings constructed during this local plan. This is set out in Chapter 2, climate change.

61	Wimbledon Society Planning Committee	N/A			The Plan is far too long. Or, perhaps rather unkindly, to use the approach followed by the writers: The Local Plan document is also surely unreasonably, unconscionably over-long, with unnecessary repetition, and would benefit from both radical text reduction and pruning. Given the restricted time for consultation, and the limited resources available, our comments are limited to putting forward proposals for changes to the Plan. As the Plan document has obviously been put together from different hands, to aid proofreading, we have also included a separate list of some of the items that seem to need correction. The Society's proposals for change are shown in heavy type, with the reasoning in normal text.	Noted
62	Wimbledon Swifts	15 Green and blue infrastructure	O15.3	p515 para 15.3.19	Biodiversity Net Gain: p 515 [1]5.3.19. Development.....should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications. Comment: Although the specific reference to integrated swift bricks and boxes is most welcome, please add a requirement for developers to follow best practice guidance principles. This will ensure an acceptable standard of biodiversity enhancement, and prevent ineffective biodiversity gestures by developers. Density of swift bricks, best practice guidance, including densities: Swift bricks should be installed in the following densities: One nest brick per residential unit. One nest brick per six square metres of wall, on commercial buildings. For further explanation, please see: The Chartered Institute of Ecology and Environmental Management Journal, Issue 104, June 2019: https://cieem.net/resource/the-swift-a-bird-you-need-to-help/ And https://swift-conservation.org/universal_swift_nest_brick02.pdf	Officers agree that it is important to make reference to best practice guidance and wording has been added to the supporting text.
63	Wimbledon Union of Residents Associations	09 Wimbledon	Wi3		Having reviewed the content of the final draft (Stage 3) of Merton's Draft Local Plan, and in particular the Site Allocations, we object to the proposed inclusion within Site Allocation Wi3 (see Ch 09 pp282-285 inc) of the AELTC's landholding in Wimbledon Park on the eastern side of Church Road, currently in use as the Wimbledon Park Golf Course and the terms upon which it is included. The purpose of Site Allocations in a Local Plan is to identify sites with opportunities for development. In our view, the inclusion of this area within this Allocation is inappropriate as this conflicts with National, London and Merton's own local planning policies as well as policies applicable to historic sites such as this with significant Heritage status	Noted. No change proposed. The proposed site allocation does not conflict with national, London wide or local policies.
63	Wimbledon Union of Residents Associations	09 Wimbledon	Wi3		Wimbledon Park and the land previously operated as Wimbledon Park Golf Club are Metropolitan Open Land. They have supreme protection under the law and the designation cannot be changed unilaterally against the wishes of the council's ratepayers and residents. This is a blatant attempt to change the designation of this important open space to allow a private club to carry out unmerited commercial development for private gain.	Noted. No change proposed. The plan and the site allocation Wi3 proposes to retain the designation of Wimbledon Park as Metropolitan Open Land.
63	Wimbledon Union of Residents Associations	09 Wimbledon	Wi3		The whole of the Grade II* Listed Wimbledon Park has been on the Historic England (HE) "At Risk" register since 2016	Noted. Link to Historic England's website for the list entry for Wimbledon Park https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/24858
63	Wimbledon Union of Residents Associations	09 Wimbledon	Wi3		Planning Policy Framework (NPPF) Policy 190 states: Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats." In our view, the designation in Site Allocation Wi3 of the AELTC owned section of the parkland as suitable for development is not consistent with the "positive strategy" envisaged by NPPF Policy 190 and will do little if anything to bring HE's "At Risk" designation to an end.	Noted. Part of the rationale for including Wimbledon Park on the "heritage at risk" register is the lack of a cohesive landscape management caused by Wimbledon Park formerly having mixed multiple owners. Reducing the ownership of Wimbledon Park to three (the Wimbledon Club, AELTC and Merton Council) will make landscape management easier to co-ordinate. However this (co-ordinated landscape management) is not solely a factor for the site allocation.
63	Wimbledon Union of Residents Associations	09 Wimbledon	Wi3		Any development proposal for protected MOL/Green Belt land must be subject to a full assessment of harm, to be weighed against the evaluation of any benefits which may be offered. By offering the proposed designation in Wi3 in this final Draft of the Local Plan, Merton appear to be looking to avoid their current responsibilities as planning authority to make that evaluation. This should not be permitted	Noted. No change proposed. The plan and the site allocation Wi3 proposes to retain the designation of Wimbledon Park as Metropolitan Open Land and therefore any planning application (including the currently submitted 21/P2900 for this site) will have to consider relevant policies relating to Metropolitan Open Land.
63	Wimbledon Union of Residents Associations				The Wimbledon union of Residents' Associations has been in existence for some 20 years. It comprises some 20 residents' associations around Wimbledon village. It therefore has representation and influence for potentially some 6,000 households	Noted.
64	British Sign and Graphics Association	12 Places and Spaces in a growing borough	D12.7	(b)(v)	These representations are submitted on behalf of the British Sign and Graphics Association in response to Policy D12.7 of the above draft Local Plan. The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, PPG and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended)	Noted.
64	British Sign and Graphics Association	12 Places and Spaces in a growing borough	D12.7	(b)(v)	We are content that Policy D12.7(a) and (b)(i)-(iv) are consistent with the requirements of the Regulations and national planning policy advice and practice. But we consider that (b)(v) exceeds the Council's powers and has no place in policy advice. All advertisements within buildings are either exempted from control or have deemed consent. They are therefore outside the Council's initial control. Policy D12.7(b)(v) implies that the council have some control over these advertisements which they do not have. Similarly, "artwork and blinds" within shop windows are most unlikely to be controllable by the Council. And why should the Council presume to involve itself in the internal layout and design of business premises. There may be very good reasons for preventing views from the street into the building or parts of it. Areas behind counters where there are shop tills or safes or storage of particularly valuable items may require screening for security and safety. And what about gyms and the like where those exercising do not want to be objects of interest to passers-by? The "advice" in (b)(v) is a matter of individual choice and has no place in Council policy. Does the Council really think that whether a person installs a simple blind within their premises is a matter with which they should involve themselves? We therefore suggest that Policy D5.6(b)(v) be deleted. The final sentence of paragraph 12.7.3 also needs amending to identify "its". It is hoped that these comments are found to be useful and informative. If you have any further questions, please contact me	No further change proposed. D12.7 (b) (v) states "Visual permeability and natural surveillance between the street and inside non-residential buildings is not compromised by internally applied artwork, blinds or advertising." This does not state that advertising cannot take place; it states that it cannot compromise natural surveillance and visual permeability between the premises and the street. If there are material considerations that require advertisements, internally applied artwork or blinds to restrict views between the premises and the street then these can be taken account of in determining the planning application.
SM01	Survey Monkey	01B Good Growth			The New Local Plan directs the majority of development to the Opportunity Area, the other district and local centres identified in the document, and additional specific site allocations which may fall outside of either. However, the Plan also notes that 'smaller scale development and more incremental change will take place' (Ch1b, p15) outside of these designated areas, but it remains very vague in this regard. The Plan does not appear to have taken account of New London Plan Policy H2 on small sites, which supports the provision of housing via the incremental intensification of existing residential areas, especially within PTALs 3-6 or within 800m distance of a station or town centre boundary – on sites that may not necessarily be designated brownfield sites (new build, infill development, residential conversion redevelopment or extension of existing buildings, including non-residential buildings and residential garages). Only paragraph 6.1.7, specifically in respect of Raynes Park, acknowledges a policy of this nature, and then only at a very local level. If the Council genuinely wishes to encourage the development of the widest possible spectrum of small sites – as the effort invested in the Characterisation Study and Small Sites Toolkits would imply – the fundamental policy document which applies across the entire borough needs to reflect this. Policy H2 also correctly notes that local character should not be regarded as set-in stone and instructs Local Authorities to 'recognise in their Development Plans that local character evolves over time.' This sentiment is not adequately reflected in the proposed Merton plan. The term 'conserve' (as in para 6.1.13) is a highly restrictive standard to apply to general suburban areas, and should be used only in the case of areas where such a level of resistance to change is actually warranted, ie, conservation areas.	The housing and design chapters contain policies which identify that small sites will make an important contribution to the housing numbers in Merton over the Local Plan period. These policies are supported by the Borough Character Study and Small Sites Toolkit, which have been consulted on and adopted. No changes required.
SM05	Survey Monkey	01B Good Growth			The Woodland Trust supports the approach in the Good Growth Strategy "The creation of a network of green spaces and other green infrastructure such as street trees, provides multiple benefits for biodiversity, nature, recreation, climate change resilience and health and wellbeing. Protecting and enhancing our green infrastructure will help our residents to lead healthier, more active lives and provide access to nature which is good for mental health." (CH 01b 11). It is disappointing that there is no explicit reference to green infrastructure or biodiversity gain in the Urban Development Objectives.	Support is noted. No further changes proposed as green infrastructure is covered in the good growth strategy.
SM09	Survey Monkey	01C Urban development objectives and vision			The vision and objectives seem commendable, however how these are translated into developments on the ground remains to be seen.	Once adopted, the Local Plan will be used by development control officers to assess planning applications. No changes required.
SM12	Survey Monkey	01C Urban development objectives and vision			Please can you advise how this plan addresses the through traffic problem in Wimbledon Town Centre and the fact that there is no ability to deliver to shops on the High Street. Please advise how increases in housing are supported by infrastructure such as doctors and schools. There is no mention of the music hall which was promised by the Council at the time of the original Speyhawk Town Centre Development. The emphasis should be on local residents as they are the main force in Wimbledon Town Centre. The document makes them a secondary consideration to businesses and developers despite the area being almost completely residential.	The comments here are covered by Chapter 14 Infrastructure, Chapter 11 Housing and Chapter 16 Transport. No changes required.

SM13	Survey Monkey	01C Urban development objectives and vision			The spatial vision declares that by 2036 Merton will "Reduced health and income inequality within the borough and the disparities between the east and west of the borough." This is morally repugnant. The problem isn't the gap between the east and west of the borough, it is the low incomes and health outcomes in the east. By referring to the disparities you leave open the possibility that making people poorer or worsening their health could solve the objective, so long as it is people in the more advantaged half of the borough whose living standards and health you diminish. The policy should be explicit that it intends to improve health and living standards among people in more advantaged areas, not allow greater disease and impoverishment of people in the more advantaged areas. The reference to reducing 'disparities' is ambiguous about this and it is appalling to allow such ambiguity to remain	Wording has been amended to add "improved community health and wellbeing" to this part of the spatial vision.
SM15	Survey Monkey	01C Urban development objectives and vision			2. The Plan states quite clearly that: sustainability and good design are to be ubiquitous. My main 'exasperation' as I see development after development provides minimal green frontage to new buildings. Along Worple Road it was customary to set blocks of flats well back from the road and to plant trees, grass and hedges along the boundary of the property. Now new buildings are placed as near to the pavement as possible and any trees will be minimal. The new 'vast' car park at Next's shop by Shannon Corner has no trees at all. The large quite high building housing the new Dundonald Church has a brick pavement with two thin trees, (surely just window dressing. Of course I understand the pressure to maximise floor space, but developments in Wimbledon are easy to finance due to the affluent nature of the area, (partly due to its historic assets), therefore new buildings need to respect and enhance the qualities not just take advantage of easy money opportunities. There are some great open spaces, but these have been provided by previous generations and public minded benefactors. More urbanization and increased populations need more open spaces not less. This can be provided by small scale areas of grass, trees and other living things. Often vast swathes of concrete paving is used and architects plans are decorated with elegantly place sketches of trees. Window boxes usually become neglected eyesores and the provision for 'nature' in the new developments seems perilously close to being a series of window boxes, not a chance to create micro-climates and small havens for birds and other wildlife in an area that can afford it and needs to set an example for what can be achieved. The destruction of the rain forests is out of our control but here in Merton a huge amount of the living environment has been lost due to the over zealous conversion of front gardens to car parking. A healthy environment consists of growing living things and all the new developments I've seen over the last 20 years are lamentably lacking in this respect.	The policies in the design chapter are clear that all development should maximise green infrastructure on site. No changes required.
SM28	Survey Monkey	01C Urban development objectives and vision			Are the plans what local residents actually want, or merely the wishes of people in positions of authority who live outside the borough, perhaps in Surrey?	This is not a comment on the policy. No changes required
SM29	Survey Monkey	01C Urban development objectives and vision			9.1.1 In Wimbledon, and all of Merton, there has been an horrendous lack of a cultural centre for use by local children, schools, choirs, orchestras, drama societies, choral societies, opera societies, etc since the Town Hall became a shopping centre many years ago. Nothing in the vision and objectives addresses this lack. Instead, concentration is on retail, office space, and accommodating the AELTC as the only major international event in the area. The introduction of a Concert Hall could provide a reason for people to visit outside the 2 weeks of the year when tennis is played. This could increase revenues over a 52 week period. Not 2.	The Wimbledon Policies in Chapter 9 identify that Wimbledon should be promoted for business, leisure, living and culture. No changes proposed.
SM31	Survey Monkey	01C Urban development objectives and vision			I do not think that giving free rein to the AELTC to develop Metropolitan Open Land - Green Belt is a strategy for good growth	Site Allocation W13 identifies the site as a world class sporting venue of national and international significance. Any planning applications that come forward on the site will need to demonstrate they meet the relevant policy requirements. No changes proposed.
SM35	Survey Monkey	01C Urban development objectives and vision			The creation of 2000 new homes within the MO4 area seems excessive considering the impact on the current public network. I agree that outside the underground, the public realm needs to be rearranged completely and buildings to be restored and modernised, but please do not repeat the same mistake of the Westfield area (W12), which is now unlivable and out of scale. The other minor developments are beneficial to the area but don't make them taller than 3 storeys. Improve safety, green infrastructure and resistance to climate change should be a priority, not the "night-time"	Detailed policies on the regeneration of Morden are set out in Chapter 5 and Site Allocation Mo4. No changes required.
SM16	Survey Monkey	01C Urban development objectives and vision			I object to the plans to build more tall buildings in Colliers Wood. It is already overdeveloped and suffers from pollution and there are limited school places.	Changes have been made to the tall buildings policy in correspondence with the GLA.
SM24	Survey Monkey	01C Urban development objectives and vision			My overarching comment is that the height of buildings should be limited on The Broadway (no more than 6 floors) and in surrounding residential areas (no more than 3 floors). If this does not occur, this will result in over-development, over-crowding, increased traffic and congestion and a decrease in attractiveness of the area and a reduction in the quality of life for residents. Residents do not want Wimbledon to become like Croydon in its sky-line or atmosphere and undermine its appeal, to residents and businesses alike.	Changes have been made to the tall buildings policy in correspondence with the GLA. Development in Wimbledon is also required to take account of the requirements set out in the Future Wimbledon SPD.
SM27	Survey Monkey	01C Urban development objectives and vision			Merton will never encourage Business or Visitors to Wimbledon Broadway area charging £4.50/hr. or the Village £3.00 (I often walk but not if a heavy shop is planned)	This is not a comment on the policy. No changes required
SM30	Survey Monkey	02 Climate Change			How is the building of 56 flats in Kingston road, a road already subject to constant heavy traffic and traffic jams help sustainability, air quality and climate change?	This is a comment on a planning application and not a comment on the policy. No changes required
SM29	Survey Monkey	02 Climate Change			CC2.1, 2.2, 2.3, 2.4, 2.5, 2.6 Is merely a collection of words, Not a policy. No indication is given of HOW this will be achieved. Planting trees would help with this. 9.1.5 mentions that the council would "support", the "re-use of planters & community planting of trees". Why only support? Why not insist all planning permissions incorporate a requirement for the planting of a specified number of trees within the borough? Whether at the shop frontage? On office roofs, in areas currently lacking green space and play areas for children?	Policies have been prepared in accordance with National and London guidance. Officers do not consider changes are required.
SM13	Survey Monkey	02 Climate Change			There is no mention of the need to maximise housing density so that more people can afford to move to Merton and live closer to employment centres and amenities. Housing density is the single biggest predictor of walking trips according to Department for Transport research, and the second most for cycling trips	This is covered in the London Plan and the council's housing policies in Chapter 10. No change proposed.
SM12	Survey Monkey	02 Climate Change			The Council need to stop using this issue as a money making exercise by taxing parked cars instead of addressing through traffic in the whole of the Borough.	This is not a comment on the policy. No change proposed.
SM11	Survey Monkey	02 Climate Change			Climate Change Policy CC2.1 states that "To make Merton a more environmentally sustainable place and net-zero carbon by 2050 [1], Merton Council aims to reduce greenhouse gas emissions and increase local resilience to the impacts of a changing climate through sustainable design." By removing Open Space status of site P002, you will be allowing development to take place. This will increase greenhouse gas emissions. This is yet another direct contravention of the Local Plan. Merton has declared a climate emergency. This again is seemingly just greenwashing if they let green, open spaces be built on.	This is a comment on the policies map open space designation change to land at the rear of Cannon Hill Lane, which is covered elsewhere in this document. No change proposed.
SM09	Survey Monkey	02 Climate Change			This is VERY important and I hope Merton will be bold and forward looking in their plans	Support noted
SM05	Survey Monkey	02 Climate Change			The Woodland Trust strongly supports Strategic Policy CC2.1 para d "Maximise opportunities to enhance green infrastructure and tree planting to deliver multifunctional benefits such as minimising the urban heat effect, enhancing natural carbon sinks and improving air quality	Support noted
SM09	Survey Monkey	02 Climate Change			The main roads running through Colliers Wood is an issue - emissions from cars have a significant impact on the local population and the MANY children attending local schools and nurseries close to the roads	This is not a comment on the policy. No change proposed.
SM31	Survey Monkey	02 Climate Change			Enforce the law on the removal of trees. Issue serious fines. Get serious	Policies on the removal of trees are covered in Chapter 15. No changes proposed
SM15	Survey Monkey	02 Climate Change			CC2.5 What happens to the council's recycling waste. We often hear how it ends up not being properly recycled. More info on what really happens to it might help inject some confidence in the process. Minimising waste should be a priority. Recycling is pretty good in Merton - but the street bin collections and waste management at street level could be vastly improved.	This is not a comment on the policy. No change proposed.
SM05	Survey Monkey	02 Climate Change			The Woodland Trust suggests complementing the requirement for measures such as rainwater harvesting and greywater recycling (para b) with outdoor measures such as sustainable urban drainage systems and bioswales	These are covered in the Flooding policies in Chapter 15. No change proposed.
SM09	Survey Monkey	03 Colliers Wood			The proposed high rise buildings adjacent to Britannia Point are a big concern to most local residents. To effectively more than double the residential capacity in this area will severely affect the neighbourhood. The wind issues and loss of light from high-rise buildings are an issue and the increase of waste, street debris etc will be exacerbated further. The big open space in front of Britannia Point is dull and dreary. This space is currently a wasted opportunity to make the area greener and a better and more pleasant environment for existing residents, and improve the whole look and feel of Colliers Wood. A community garden and/or raised flower beds etc and some better quality seating would vastly improve this space. The active local group Colliers Wood Parks and Green Spaces might be happy to take ownership of the maintenance as they currently do in Baltic Close, where they have made a magnificent change for the better. The 2 trees that died on the side of Britannia Point facing the parade of shops have never been replaced.	Changes have been proposed to the tall buildings policy in the design chapter. Further details are also provided in Site Allocation CW2. No changes proposed.

SM03	Survey Monkey	03 Colliers Wood		<p>SITE CW2: CAR PARK SOUTH OF BRITANNIA POINT, 125 HIGH STREET COLLIERS WOOD, SW19 2JG We welcome the reintroduction of phrase "Britannia Point should remain the pinnacle building in the town centre in terms of height", following a petition being signed by 417 local residents. But would like to reiterate that there is still a large local objection to anything being built here beyond the initially approved 10 story single building to the south side of the existing tower. SITE CW3: COLLIERS WOOD COMMUNITY CENTRE, 66-72 HIGH STREET COLLIERS WOOD, COLLIERS WOOD, SW19 2BY We believe that the Community Centre is a vital community asset and should be retained as community asset or on a very long lease. We welcome the fact that the design and accessibility guidance for this site requires the provision of community uses on the lower floors. We believe that the Plan should stipulate that any redevelopment must as a minimum provide the same cubic footage for community use as the existing community centre. SITE CW4 COLLIERS WOOD, 2-24 CHRISTCHURCH ROAD, COLLIERS WOOD, SW19 2HR The Association notes that the brief for this site envisages a mixed-use redevelopment that could include taller buildings subject to consideration of impacts on neighbouring properties, existing character, heritage, townscape and environmental issues. We believe that it is important that the redevelopment of this site does not have any negative impact on the amenity of existing dwellings, especially those in nearby Valley Gardens, North Gardens and South Gardens. We would welcome the inclusion of words to this effect in the Plan. SITE CW5 COLLIERS WOOD – PRIORY RETAIL PARK, COLLIERS WOOD We are aware of the potential for the green space between the Pickle Ditch and Merton Priory wall to be developed as a small park. If this potential is realised then, in the event of a redevelopment of the Retail we would want the amenity of any such park to be safeguarded. LOCAL INFRASTRUCTURE TO SUPPORT NEW DEVELOPMENTS We note that Wimbledon, Colliers Wood and South Wimbledon have (together) been identified as an opportunity area in the new (2020) London Plan, with an expectation that this area provides 5,000 additional homes and 6,000 additional jobs over the next 20-25 years. Colliers Wood has already seen a large number of additional homes provided through refurbishment, redevelopment or new build. These developments have, inevitably, created additional demand on local amenities, facilities and services. We are concerned that further developments in the area could exceed the capacity of some or all of these local services, such as parks, transport, education, health care and public utilities. We note that Strategic Policy IN16.1 states that "We support the provision and improvement of infrastructure across the borough and will work with relevant providers to ensure that the necessary infrastructure is secured to support growth in the borough over the plan period." And in particular that: "We will: a. Expect new development to identify, plan for and provide any necessary infrastructure and require that, where necessary, infrastructure should be completed prior to occupation. b. Work with service providers and partners to enable them to deliver the provision of services and facilities for the projected population growth, especially in areas of significant new homes and areas of deficiency." Given the number and scale of recent local developments we believe it is important that the Council adheres closely to these policies when considering development proposals for Colliers Wood sites. We welcome this opportunity to convey residents' views and looks forward to working with the Council's planners and with local developers to ensure that future developments in the area are attractive, appropriate and sustainable and enhance the quality of life of new and existing residents.</p>	Comments noted. Changes have been made to the tall buildings policy in conversation with the GLA and further changes made to the design policies. Infrastructure requirements are set out in Chapter 14 and specific requirements are also identified in individual site allocations. No changes proposed
SM16	Survey Monkey	03 Colliers Wood		<p>Yes, colliers wood town centre is Over developed already. It is not suitable for more housing due to road pollution, lack of extra school places, and adverse impact on light to local properties. The work to build the towers around colliers wood town centre would cause environmental damage adjacent to parkland and rivers. Post covid, and changes to working practices to work at home, people want homes with outside space rather than living in flats.</p>	Noted. The Local Plan provides policy details on how development can come forward on sites that would help to better the town centre. No changes proposed
SM14	Survey Monkey	04 Mitcham		<p>SITE Mi3. 1. Site description The cricket pavilion is described as 'built around 1920'. It opened in 1904.</p> <p>2. Site designation The first two sentences currently read: 'Secure community ownership and management of the land and buildings associated with Mitcham Cricket Pavilion and restoration of the Burn Bullock supported by enabling development. Use of the cricket pavilion and associated shed in perpetuity as a cricket pavilion serving Mitcham Cricket Green.' We suggest amend 'buildings' to 'building' in the first sentence and remove the phrase 'and shed' from the second sentence. We suggest also that the Burn Bullock, a much higher value heritage asset than the Cricket Club, is put first. This also avoids unnecessary repetition. So that the text can read: 'Repair and re-use of the Burn Bullock supported by enabling development. Secure community ownership and management of the Mitcham Cricket Pavilion to enable its use in perpetuity as a cricket pavilion serving Mitcham Cricket Green.'</p> <p>In the final sentence of the site designation, the way it is worded suggests that the residential development is purely for the benefit of the cricket club. It is to repair the Burn Bullock without jeopardising the viability of the club. We therefore suggest this sentence is amended to read: 'Residential development on the car park to the rear of the site to enable repair of the Burn Bullock and the continuing use of the cricket pavilion.' Elsewhere in the document, in the design and accessibility guidance, we suggest removing the references to land and buildings in the plural for consistency.</p> <p>3. Reasons: The cricket pavilion is worthy of protection and has been in continuous use since 1904. It is proper to seek its protection and to provide for its viable use, but unreasonably restrictive to protect the shed and the precise boundary of the rectangular plot of land that is currently associated with the Cricket Club. The shed associated with the Cricket Club is not worthy of protection. It is a metal shed, an ad-hoc building of no significance dating from about 1990. If it were beneficial to provide storage or ancillary facilities for the cricket club in another way this should not be prevented by the site designation. The land at the rear of the Cricket Club has been associated with the cricket pavilion since about 1930. The OS map of 1910 shows no such subdivision of the site, which, prior to the erection of the cricket pavilion had been kitchen gardens associated with the inn, then called the Kings Head. The area to the rear of the pavilion should be considered as part of a holistic development of the site, which would allow synergies between the various uses. The plot boundary follows the line of a former outbuilding of the inn, since demolished. If the rectangular plot currently associated with the club were strictly protected by this site designation and fenced off from the rest of the site it would unreasonably restrict development of the site as a whole.</p>	no change proposed. The shed associated with the Cricket Pavilion is for storage of items relating to the playing of cricket on the Cricket Green and it is proposed for retention as associated with the Cricket Club
SM21	Survey Monkey	04 Mitcham		<p>Point M p.112. Further details required on strategic ambition, which is to (A) Increase density and opportunities to live in the borough (B) to support residents living in their homes for longer by providing accommodation for older residents (C) Replace and upgrade the community and youth centres into a single building connecting the library.</p> <p>4.1.9 Supporting the town centre development is all well and good however, Pollards Hill residents have local shopping parades that require support in provision of waste facilities, street scene and other popup initiatives. How does this policy of centralisation enable residents to access shops and provide business opportunities and local jobs. How can the tram on the other side of the common be linked with Pollards Hill through for example dedicated high speed cycling routes, bike storage, signage and removal of line of sight obstacles in order to bring the benefits of connectivity to Pollards Hill without the capital spend required to extend the tram itself. This will enhance points made in 4.1.8 p.114 4.1.15 p.115 seems to suggest a direction of travel but do not contain sufficient detail.</p> <p>4.1.11 What preparation is being made to pull the Wilson clinic into the town centre to increase footfall and make it more accessible to residents? Land swap arrangements with NHS etc. The point is the provision and the location are equally important issues and this is an opportunity to address equality of access due to current sites.</p>	<p>1. Further details on the Clarion Estates regeneration are contained within the Estates Local Plan. No changes proposed.</p> <p>2. This paragraph identifies the major sites that have been identified for development, in addition to the London Plan policies which prioritise residential development around transport hubs. This does not prevent development coming forward in other areas of the borough. Further policies on transport, cycling and connectivity are provided in Chapter 16. No changes proposed.</p> <p>3. Officers have been liaising with NHSPS and the CCG to ensure the health needs are identified for the borough in the local plan and site allocations. Discussions are still ongoing, however the site allocations in the Local Plan reflect the current position based on evidence provided to date from the NHS. No changes proposed.</p>
SM01	Survey Monkey	05 Morden		<p>Q - Do you have any additional comments on Policy N5: Morden? Please provide the paragraph number. A - Needs to more positively reflect the intent of new London Plan policy H;</p>	Noted
SM38	Survey Monkey	05 Morden		<p>Q - Do you have any additional comments on Policy N5: Morden? Please provide the paragraph number. A - I wouldn't trust Merton Council to take me across the road!!</p>	Noted
SM01	Survey Monkey	06 Raynes Park		<p>paragraph 6.1.7 is the only instance in the document where new London Plan policy H2 is reflected. But the use of the term 'conserve' in para 6.1.13 is inappropriate to most general suburban areas and unduly restrictive of positive change, and should be applied only in respect of designated conservation areas.</p>	Agreed. Change made for clarity.
SM15	Survey Monkey	06 Raynes Park		<p>N6 The new building housing Dundonald Church is much higher than it was before. How will the extensive building plot to the west be developed? As high, as close to the road and will there be enough 'green' to improve the street.</p>	The site mentioned here already has planning permission - refer to Planning Application 19/P1675. No changes proposed.
SM15	Survey Monkey	07 South Wimbledon		<p>N 7 South Wimbledon, again, lacks trees and so is depressing. Though it does have one big newish building.</p>	Noted. This is not a comment on the policy. Policies on green infrastructure are provided in Chapter 15. No changes proposed.
SM40	Survey Monkey	09 Wimbledon		<p>On Wi5 Hartfield Walk the paragraph which reads " A connection for pedestrians and cyclists between The Broadway and Hartfield Road should be maintained through the site" should also preserve pedestrian access southwards to the bus station. Improved crossing facilities from the bus station to the other side of Cyril Black Way would also be welcome.</p>	Officers do not propose any changes.
SM39	Survey Monkey	09 Wimbledon		<p>Plough Lane development continues to generate excess traffic and exceptionally poor air quality at the Plough Lane Gap Road junction - more trees are needed to reduce the pollutior</p>	This is a comment on a planning application, not a comment on the policy. No changes proposed

SM29	Survey Monkey	09 Wimbledon			<p>3.6 Town Centre (a) refers to "Promoting Wimbledon as SW London premier location for business, leisure, living and culture". There is no mention anywhere as to a venue to accommodate "culture"? Events such as the music and book festivals currently rely on ad hoc venues such as churches, or on tents on Wimbledon Common. That somewhere considered, by Merton, to be as important at Wimbledon has been left without a Culture Centre / Concert Hall for use by schools, churches, music groups, drama groups, residents, etc for decades is surprising to say the least. 3.6 (b) Talks of encouraging cultural activity but, again, with no mention of WHERE? There is no Culture Centre / Concert Hall which can accommodate anything other than a small group of persons, a small orchestra, a small choir, etc. Why is there no proposal to deal with this?</p> <p>3.6 (g) What will be the community uses and where will they be accommodated? Wimbledon's Community Centre, located in St George's Road, was allowed to fall into disrepair until it became uninhabitable in 2012. It was demolished, by Merton, in 2013. It has been a derelict site for 8 years. It used to be a thriving space used by many. Where was the point in not maintaining it until a viable alternative could be provided? Where in the plan, is the proposal to replace it by a COMMUNITY Centre rather than more retail outlets & offices?</p>	<p>Policy TC13.9 Culture, arts and tourism development provides further details on cultural facilities.</p> <p>Further details on social and community infrastructure are provided in Chapter 14. No changes proposed.</p>
SM23	Survey Monkey	09 Wimbledon			<p>The Friends of Wimbledon Park (FOWP) is a voluntary organisation that aims to give a voice to local people, community groups and other interested parties, to protect and enhance this well-loved heritage landscape, Heritage Wimbledon Park, for future generations. This is our response to Local Plan Publication Stage 3. We have extracted sections with comments below in red.</p>	<p>These comments are already considered in the Friends of Wimbledon Town Centre rows above.</p>
SM19	Survey Monkey	09 Wimbledon			<p>WIMBLEDON: POLICY N9.1 SITE ALLOCATIONS SITE Wi3: All England Lawn Tennis Club (AELTC) - Church Road, Wimbledon The whole ethos of the New Local Plan 2021, in line with National Planning Policy Framework, London Plan, and adopted LBM policies, is to promote sustainable development based on the protection of the Historic Heritage of Merton environment, this particularly applicable when dealing with a site designated as Metropolitan Open Land, designated Heritage Asset Grade II*, and within a Conservation Area. The inclusion of Site Wi3 in the Draft Local Plan, as demonstrated in the justification detailed in pages 282 to 285 (no paragraph number available) is in complete contradiction with the policies mentioned above. As such, I would ask the Inspector to delete Site Wi3 from the Site Allocations altogether and request LBM to prepare a Supplementary Planning Guidance document specific to cover the appropriate description, constraints and character of the area identified in Site Wi3. This document should be prepared in consultation with the London Borough of Wandsworth and involve all local stakeholders, and not limit itself to respond to the aspirations of the AELTC or the Masterplan produced by their professional team which appear to have had unwarranted influence in the drafting of this section of the policy as referred to above.</p>	<p>Site Allocation Wi3 identifies that this site has been put forward as a world class site of international and national sporting significance. These uses are considered to fall within appropriate uses within Metropolitan Open Land and therefore, the Policies Map designation is not proposed to be removed. Any details pertaining to a planning application will be assessed by the development control team. No changes proposed.</p>
SM01	Survey Monkey	10 Health and Wellbeing			<p>The focus on mental health is welcome in principle. The challenge is to prevent this becoming a subjective matter used by parties as a new basis for objecting to anything. One also wonders what in-house expertise the council needs to develop to be able to provide positive guidance on this relatively new area of consideration</p>	<p>Support is noted. Officers work with the council's health team to ensure the information provided is up to date and reflects the council's and resident's health and wellbeing priorities. No change provided</p>
SM05	Survey Monkey	10 Health and Wellbeing			<p>The Woodland Trust supports the aspirations in para f for improved access to green space and in para j for an integrated approach. We recommend incorporating Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard. Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space: -Of at least two hectares in size, no more than 300m (five minutes' walk) from home. -At least one accessible 20-hectare site within 2km of home. -One accessible 100-hectare site within 5km of home. -One accessible 500-hectare site within 10km of home. -A minimum of one hectare of statutory local nature reserves per 1,000 people. The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: -That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. -That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.</p>	<p>Support noted. No change proposed as these matters are covered in the Green Infrastructure Chapter 15.</p>
SM12	Survey Monkey	10 Health and Wellbeing			<p>How is the problems and demands caused by density increase in Wimbledon Town Centre going to be managed. Until this is explained, there should be no increase in density.</p>	<p>This is not a comment on the policy. No changes proposed.</p>
SM21	Survey Monkey	10 Health and Wellbeing			<p>10.1.7 There are schools currently not part of school streets. What are the alternative policy that can be implemented. The Council should make it clear its a menu of options not a binary choice. Otherwise areas such as Lonesome school and others will always remain outliers</p>	<p>This is not a comment on the policy. No changes proposed.</p>
SM29	Survey Monkey	10 Health and Wellbeing			<p>HW10.1 "We will continue to improve and promote....." Continue? Health & wellbeing will not be improved by allowing the AELTC to take over & repurpose any part Capability Brown's 18th Century, Grade II Registered Park & Garden. If MORE green spaces are needed, particularly as children's play areas, there can be no justification under health & wellbeing for allowing an existing one to be partially removed with a negative impact on what is left and on local residents. The AELTC may be important but, as with any monopoly, it is important that it is not allowed to dominate</p>	<p>Site Allocation Wi3 identifies the site as a world class sporting venue of national and international significance. The Metropolitan Open Land designation is not proposed to be removed. Any planning applications that come forward on the site will need to demonstrate they meet the relevant policy requirements. No changes proposed.</p>
SM29	Survey Monkey	10 Health and Wellbeing			<p>HW10.2 "Proposals" can do no such thing. It is how they are project managed to ensure they are put into being which matters. 10.2(iii) Allotments sound like an excellent idea. Where will/can they be located? 10.2.6 To provide a healthy environment it needs to be remembered that tall buildings (constantly referenced by the plan) will have the reverse effect. Tall buildings create wind tunnels and can easily result in a heat-island effect (as in Tokyo) both of which are seriously detrimental to health. It will be necessary to ensure all proposals involving tall buildings contain the results of a computational fluid dynamics (or similar) study to ensure that no negative outcomes will result. 10.2.3 If 21% of children are obese, yet fast food outlets proliferate, how will not allowing them within 400m of a school exit help? It will merely more the problem; not overcome it. 10.2.5 Does this mean that the financial viability is more important than the health implications?</p>	<p>Officers have reviewed these comments and no changes are considered necessary to make the plan sound.</p>
SM05	Survey Monkey	10 Health and Wellbeing			<p>In a iii "Encourage opportunities for food growing such as allotments, community gardens and other innovative food growing spaces as part of development proposals." we suggest adding explicit reference to community orchards.</p>	<p>Agreed and change made</p>
SM29	Survey Monkey	11 Housing	H11.1		<p>11.1 (d) states that there is a requirement for 90% of housing to be accessible for the disabled but only 10% to be wheelchair accessible. How is this justified? Where are the requirements for all new housing to have heating other than that provided by gas given the intent to phase out gas boilers? Requirements for insulation to ensure energy costs & requirements are kept to a minimum and new housing does not negatively impact on climate change?</p>	<p>Noted. No further change proposed. Policy 11.1(d) requirements are in conformity with the London Plan. The draft Local Plan should be read as a whole and housing development proposals must adhere to all relevant requirements of the Local Plan including those contained in Chapter 2 (Climate Change).</p>
SM29	Survey Monkey	11 Housing	H11.2		<p>The stated aim is for an increase of 11,732 houses between 2021/22 & 2035/36. As this will increase the density of housing provision in Merton what will be the impact on service requirements (water, electricity, gas, sewage), parking, increased congestion, access to amenities: school places, education in general, culture, green spaces, corner shops, provision of electrical charging points for cars, etc? 11.2.11 Is South Wimbledon to get no new housing? If so why not?</p>	<p>Noted. No further change proposed.</p> <p>The Infrastructure Delivery Plan (IDP) has been prepared as part of the evidence base to inform the development of the new Local Plan. The IDP identifies the necessary infrastructure that will be required to ensure that future development is accompanied by the relevant services and facilities that are needed to sustain growth.</p> <p>The draft Local Plan should be read as a whole and housing development proposals must adhere to all relevant requirements of the Local Plan including those contained in Chapter 14 (Infrastructure), Chapter 15 (Green and Blue Infrastructure).</p> <p>South Wimbledon nighbourhood is based around a local centre and the site allocations are attributed to the adjacent larger neighbourhoods of Colliers Wood and South Wimbledon.</p>
SM29	Survey Monkey	11 Housing	H11.3		<p>11.3 indicates that 50% of housing should be affordable BUT then indicates that this requirement need be on site ONLY for developments of 10 homes and that developers need only show that 90% of applications received over 10 years to 2017 have been for less than 10 homes. This effectively means that affordable homes will NOT be provided surely? There are ways to avoid their provision and it sounds as if those ways will be allowed. Thus developers need only to have "taken account of the strategic 50% target or to consider an "increase.....beyond 35%. How will this help those needing affordable housing - in REAL terms?</p>	<p>Noted. No further change proposed. The policy requirements for affordable housing provision set out in Policy 11.1 is supported by evidence set out in Merton's Affordable housing Viability Study, on what can viably be delivered.</p>
SM29	Survey Monkey	11 Housing	H11.4		<p>Where will supported care housing be located.</p>	<p>Noted. No further change proposed. Policy H11.4 sets out the criteria that supported care housing proposals will need to adhere to and includes the those concerning appropriate locational requirements.</p>
SM29	Survey Monkey	11 Housing	H11.5		<p>Will student housing be built? If so where?</p>	<p>Noted. No further change proposed. The building of student housing will be subject to addressing an identified local need. Policy H11.5 sets out the criteria that student housing proposals will need to adhere to and includes the those concerning appropriate locational requirements</p>

SM12	Survey Monkey	11 Housing	H11.1		We should not just have a target to just build houses without proper infrastructure and effect on the community.	Noted. No further change proposed. The Infrastructure Delivery Plan (IDP) has been prepared as part of the evidence base to inform the development of the new Local Plan. The IDP identifies the necessary infrastructure that will be required to ensure that future development is accompanied by the relevant services and facilities that are needed to sustain growth. The draft Local Plan should be read as a whole and housing development proposals must adhere to all relevant requirements of the Local Plan including those contained in Chapter 14 (Infrastructure), Chapter 15 (Green and Blue Infrastructure).
SM21	Survey Monkey	11 Housing	H11.1	Para H11.1.1	11.1.1 p.336 contradicts current exemption policy applied for the regeneration of Clarion Estates. Can you outline why and when and exemption will be applied.	Noted. No further change proposed. Planning permission for Clarion's estates regeneration was granted in 2019 and the applications were assessed against the adopted Local Plan and found to be in accordance with it. This draft Local Plan is therefore not relevant for the previously approved planning applications.
SM21	Survey Monkey	11 Housing	H11.2d		H11.2 d. We've already noted waste arrangements for small sites have caused issues with local residents e.g. Commonside East. What plans are there to mandate containerisation and other forms of at scale collection to allow the minimum effort from residents and contribute to improved street scene and resident wellbeing?	Noted. No further change proposed. Appropriate design solutions are likely to differ for each site but the council does have a guidance document with detailed requirements. Part 'u' of draft Policy D12.3 'Ensuring high quality design for all developments', seeks to "Ensure that the design and management of facilities for recycling, storage and disposal of household waste is in accordance with Merton's Waste and Recycling Storage Requirements and is part of the overall design approach and does not adversely affect the primary building function, appearance of the building and character of the street". Furthermore, part 'v' of draft Policy D12.3 seeks to "Ensure refuse facilities are convenient, allowing bins to be manoeuvred easily and include sufficient capacity to accommodate increase recycling requirements. Refuse bins should not obstruct footways, so for sites with restricted access, suitable hardstanding should be provided for bins to be relocated to on collection days. The Council will support underground waste collection systems for major redevelopment schemes where proposed systems are accepted by the council's appointed waste contractor and do not compromise highway safety."
SM21	Survey Monkey	11 Housing	H11.2a		Policy needs to include diversifying housing providers in the borough to reduce risk of no/under construction and repair issues	Noted. No further change proposed. Policy does not specify any particular type of housing provider therefore does not preclude provider diversification.
SM05	Survey Monkey	12 Places and spaces in a growing borough			The Woodland Trust supports the broad principle in b to Champion sustainable design and construction principles, in order to minimise greenhouse gas emissions. We would encourage a policy that developments should make a positive contribution to the natural environment, supporting biodiversity net gain and nature recovery as a separate goal, not merely an adjunct to climate resilience.	Other policies on biodiversity and green infrastructure are provided elsewhere in the Design chapter and also in the Green Infrastructure chapter. No changes proposed.
SM05	Survey Monkey	12 Places and spaces in a growing borough			Support g) Proposals should include sustainable drainage measures (SuDS), urban greening features and tree planting where possible and appropriate. We recommend setting a target % for tree cover as part of a wider target for green infrastructure and nature-friendly land use. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).	Support is noted. Policies on trees and green infrastructure are provided in the Green Infrastructure chapter 15 in accordance with the London Plan. No changes proposed.
SM05	Survey Monkey	12 Places and spaces in a growing borough			Support paras r) and cc) on biodiversity and Suds. We support setting a greater than 10% target for net gain. By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice. We would also encourage considering development of a local metric for more urban/brownfield sites, such as the London Urban Greening Factor, because such sites may already have a very low level of biodiversity and therefore a percentage increase may not in practice deliver significant enhancements. Strongly support dd) We welcome the presumption in favour of the retention of existing trees on development sites. We further request that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted. We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016).	This comment is repeated below in the Green Infrastructure chapter a response has been provided there.
SM12	Survey Monkey	12 Places and spaces in a growing borough			Tall buildings should not be higher than six stories especially within Wimbledon Town Centre.	Changes to the tall buildings policy have been made in discussion with the GLA. The Future Wimbledon SPD is also of relevance for Wimbledon.
SM15	Survey Monkey	12 Places and spaces in a growing borough			D 12.1 More houses or flats means you need more open green spaces not less. Even small spaces can be effective in bringing, living breathing nature into our urban landscape.	Policies on Green infrastructure are contained in Chapter 15. No changes proposed.
SM16	Survey Monkey	12 Places and spaces in a growing borough			Colliers wood should not have any more tall buildings.	Changes to the tall buildings policy have been made in discussion with the GLA. Refer to the design policies and site allocations.
SM21	Survey Monkey	12 Places and spaces in a growing borough			Clarity required in this section about growth in Mitcham town centre. What is the role for tall buildings to deliver this ambition?	Changes to the tall buildings policy have been made in discussion with the GLA. Refer to the design policies and site allocations.
SM25	Survey Monkey	12 Places and spaces in a growing borough			Policy D12.5 f The wording of Policy D12.5 focusses mainly on the built heritage. Merton is clearly aware of its historic parks and gardens (both designated and non designated) as referenced in the local plan justification text and on its website https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/historic-buildings-parks-gardens . Unfortunately the impacts of development on valued open spaces have not been addressed in policy and therefore they will be unprotected by the local plan. Insert into (f) Proposals affecting the layout, design, character, use and function of both designated and non designated historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration. Clarity of policies for historic parks and gardens: Please continue to respect the heritage value of all "designed landscapes" / "historic parks and gardens" and ensure changes do not exclude undesignated heritage assets of open spaces. Heritage assets include designated and non designated sites. There are two tiers of historic parks and gardens, those on Historic England's register – "registered parks and gardens" and those of local interest. https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/historic-buildings-parks-gardens .	The consideration of open spaces is covered in Policy 12.2(k), which has a minor amendment for clarity. No further changes required. A change has been made to Policy 12.6(f) for clarity in accordance with the suggested wording.
SM29	Survey Monkey	12 Places and spaces in a growing borough			12.1 Generally it is preferable not to include high-rise buildings into the Wimbledon Centre area but to keep with the majority low-rise buildings currently in place. (d) References noise pollution which indicates that increasing density of use should be handled with care especially where trading late into the evening may impact on residential comfort. (e) Engaging with the local community is hopefully going to continue with the desire of said community being respected. All surveys submitted support the inclusion ONLY of low-rise buildings which have a frontage reflecting the characterful, older, elements of the Wimbledon Centre area rather than later modern, and less architecturally superior, buildings which have appeared over the years.	Changes have been proposed to the tall buildings policy in discussion with the GLA.
SM29	Survey Monkey	12 Places and spaces in a growing borough			12.2 (n) Wheelchair accessibility of only 10% seems less than adequate? (q) Encouraging "active modes of transport" sounds positive but cyclists, and even more illegal e-scooters, pose a real danger to pedestrians in general - particularly the disabled and children. Prioritize pedestrians and the disabled over cyclists and other wheeled vehicles which operate at speed please. 12.2 (r) Will "appropriate tree planting" be compulsory? 12.2. (v) How will adequate car parking be provided and where? How will it be ensured that cyclists, and others using social wheeled vehicles (not necessary as in wheelchairs) do not prevent pedestrians "enjoying space safely"? 12.2 (y) How will it be demonstrated that "appropriate measures have been taken to protect and enhance the natural environment"? 12.2.11 Discouraging "travel by car & excessive on-street parking....." sounds good. It is only possible if increased revenues are to be generated only from those living in the immediate vicinity of Wimbledon Centre or there is sufficient OFF-street parking. Wimbledon will not attract as much footfall as, for example, Richmond or Kingston, if people are not able to drive and to park. Shoppers, on the whole, do not want to cycle. Those coming to eat and drink in the evenings will not want to cycle home.	1. This is in line with the London Plan requirements. 2. Policies on trees and green infrastructure are in Chapter 15. 3. Policies on sustainable transport are covered in Chapter 16. 4. In accordance with the policies in Chapter 15. 5. This is not a comment on the policy. No changes proposed.

SM29	Survey Monkey	12 Places and spaces in a growing borough			12.3 Modern design is rarely sympathetic to the environment in which it is placed and, therefore, things do not look "all of a piece". How is this to be avoided? 12.3 (l) Only 10% wheelchair accessibility is too low. 12.3 (t) Oversize plastic containers for refuse and recycling are an eyesore and already "negatively impact the appearance of the building & character of the street". What can be done about the existing ones let alone the new? 12.3 (y) Ventilation should definitely not include air conditioning as we know it with its negative climate impact. 12.3 (bb) Light pollution is proven to effect the eco system by having a negative impact on insects and reducing their number. Does one wish to increase lighting by increasing building density? 12.3.18 Bi-weekly refuse collection is a backward, negative, step.	Officers have reviewed these comments and consider that no changes are required to make the plan sound. Some comments do not relate to the policy.
SM29	Survey Monkey	12 Places and spaces in a growing borough			12.4 Ensure that all visible alterations & extensions are in the same style as the original building.	No changes proposed
SM29	Survey Monkey	12 Places and spaces in a growing borough			12.5 Heritage assets need to be protected at all costs. Wimbledon Centre lost its Concert Hall when the Town Hall became a shopping mall. It lost its Community Centre when the one in St George's Road was allowed to become derelict beyond use and then demolished (2013) to become a vacant site for 8 years. Merton Hall in the Kingston Road was defaced (with Council permission). All buildings and sites of historical interest need to be fully protected. The Fire Station in Queen's Road. The Prince of Wales Public House, Wimbledon Park designed by Capability Brown and dating from the 18th Century (which should not be re-purposed with the golf course used by the AELTC). There are many others. If buildings have to be replaced let it be the modern, unattractive, ones which add nothing to the ambience or appearance of Wimbledon Town Centre. Random shopfront facias, clashing colours advertising various outlets, there is no cohesion & no attraction. Wimbledon Station has architectural appeal but looks appalling with odd lighting and an odd metal sculpture. Why can this not become the Town Square? A green space where people can sit and enjoy their environment amongst trees, grass and flower beds (or boxes) and paths? It used to be the case that people could drop, or collect, family members. This is no longer so with that facility replaced by unattractive paving. To return it to a community asset why can not the access route to the side be used by residents as well as black cabs?	Heritage assets are designated on the Policies Map and listed in the Appendices. These are material considerations for any planning application. No changes proposed to the policy.
SM29	Survey Monkey	12 Places and spaces in a growing borough			12.6 Tall buildings may look good in New York but in few other places. By their nature they impact negatively on any environment into which they are placed. They overlook and overwhelm. This is particularly so when they are close to residential areas, open spaces and metropolitan open land (the latter two of which should be protected with the same rigour as all heritage assets). Tall buildings interrupt views, overlook private gardens, block out light, reduce sunlight. They should be discouraged NOT in any way encouraged if Merton wants to improve the Health & Wellbeing of Wimbledon	Changes to the tall buildings policy have been made in discussion with the GLA. Refer to the design policies and site allocations.
SM29	Survey Monkey	12 Places and spaces in a growing borough			Advertisements impact negatively on any environment. Their only justification is that they make money. Is that enough?	This is not a comment on the policy. No changes proposed
SM37	Survey Monkey	12 Places and spaces in a growing borough			We do not need any more high rise blocks in the area	Changes to the tall buildings policy have been made in discussion with the GLA. Refer to the design policies and site allocations.
SM39	Survey Monkey	12 Places and spaces in a growing borough			tall is fine if the plot is small and enables green space to be kept	Changes to the tall buildings policy have been made in discussion with the GLA. Refer to the design policies and site allocations.
SM39	Survey Monkey	12 Places and spaces in a growing borough			Houses should be kept and not allowed to be converted to flats - houses are what are needed, not 30 storey blocks of flats	Further policies are contained within the housing policies in Chapter 11.
SM39	Survey Monkey	12 Places and spaces in a growing borough			basements are a useful extension of a property and planning should be made easier	Noted. Not a comment on the policy
SM31	Survey Monkey	12 Places and spaces in a growing borough			Don't allow basement development it is wrecking water flows and is serious over-development	Further policies on basements and flooding are provided in the Flooding policies in Chapter 15. No changes proposed.
SM29	Survey Monkey	12 Places and spaces in a growing borough			D12.11 Basement conversions are causing problems in central London including the subsidence/disappearance of entire dwellings?	Further policies on basements and flooding are provided in the Flooding policies in Chapter 15. No changes proposed.
SM09	Survey Monkey	12 Places and spaces in a growing borough			We are in a flood plane in Colliers Wood. All developments that involve basements or subterranean design should be avoided at all costs.	Further policies on basements and flooding are provided in the Flooding policies in Chapter 15. No changes proposed.
SM12	Survey Monkey	13 Economy and Town Centres			Economic growth should be tied in with the needs of local resident. We presently have one of the worst high streets in England due to amongst other things by Love Wimbledon on footfall and outside visitors. This promotes business chains who can afford the high rents and rates as opposed to small privately run local shops (see Deptford High Street where there is good diversity)	No changes proposed
SM12	Survey Monkey	13 Economy and Town Centres			The new working style brought in by Covid of working from home means that the demand for offices should be reviewed.	The Local plan has been updated to include wording on how the implications of Covid. The full implications are not yet known and the local plan continues to plan for space for businesses, jobs, training and other employment spaces. No changes proposed.
SM13	Survey Monkey	13 Economy and Town Centres			Requiring landowners to leave land classed as 'scattered employment sites' idle for 18 months in the middle of a housing crisis is appalling. The council should stop putting obstacles like this in the way of housing delivery.	The policy sets out the requirements for scattered employment sites that the council supports, in order to protect sites that may not be appropriate for residential development. The supporting text provides further details on this. No changes are proposed by officers to this policy
SM13	Survey Monkey	13 Economy and Town Centres			The best way to promote successful high streets is to maximise population growth in the borough to maximise the likelihood of viability	Not a comment on the policy. The Local Plan cannot directly change the population growth of the borough.
SM21	Survey Monkey	13 Economy and Town Centres			Business Policy TC 13.7 Issue in this section is do not address parades often have waste issues especially for residents living above them that detract from the goal of attracting footfall. What steps can be taken to pool waste collection to meet wider policies on street scape and the environment? How will the council support parade and local shop businesses to attract customers and grow and in so support the implementation of the planning policies and intentions outlined in this section. B. i - Would this not deprive a community of a commercial unit? Can this section be explained a bit more please.	The design policies in Chapter 12 contain requirements for waste facilities as part of developments. No changes required.
SM29	Survey Monkey	13 Economy and Town Centres			13.1 How? 13.1.2 There is not a "profound decline in jobs" nationally? There were 862,000 jobs on offer April - June 2021; an increase of 77,500 over 2020? There are shortages of staff rather than jobs.	No changes proposed
SM29	Survey Monkey	13 Economy and Town Centres			13.2 (e) How is Merton planning to strengthen pathways through education? 13.2 (h) It is good to "require developers and applicants on major sites to support the involvement of local residents & businesses". What is a "major site"? Why not require them to EMPLOY local residents and businesses? 13.2.5 Are all existing office spaces in Wimbledon Centre operating at full capacity? For example Tuition House? Given the increase of remote working is the need for additional office space still as it was when this proposal was prepared?	Major development site is defined in the London Plan. Based on the latest evidence available, office space in Wimbledon is still encouraged. Although the policies do make reference to the impact that Covid has had on the economy. No changes proposed.
SM29	Survey Monkey	13 Economy and Town Centres			By this definition is Wimbledon Village a scattered employment site?	Wimbledon village is identified as a Local Centre on the policies map and therefore would not meet this definition. No changes required.
SM29	Survey Monkey	13 Economy and Town Centres			13.4 (c) "10% of total jobs created by construction of new development and 20% end use job opportunities and apprenticeships to be advertised exclusively to local residents." This seems a very small number?	Officers have reviewed and don't propose any changes to this policy.
SM29	Survey Monkey	13 Economy and Town Centres			13.5 (a) ii Would larger shops, occupying amalgamated shop fronts, to be prohibited in Wimbledon Village not be preferable to an ongoing increase in charity and empty retail outlets? 13.5.8 It is good that an increase of betting shops and fast-food outlets will not be allowed outside the town centre	Noted. No changes proposed.
SM29	Survey Monkey	13 Economy and Town Centres			New Wimbledon Theatre and the Polka children's theatre provide cultural outlets towards South Wimbledon. There are also two cinemas on the Broadway. However, for decades now, Wimbledon has lacked a cultural centre or concert hall which would allow local schools, children's groups, choirs, choral societies, orchestras, drama groups, etc a venue to perform. Such a facility would attract national and international orchestras, provide a permanent home for the Wimbledon International Music Festival, the Book Festival, and attract visitors to Wimbledon for cultural events year round whereas the AELTC attracts only for 2 out of 52 weeks. This would improve Wimbledon's national, and international, reputation and make it known for something other than tennis. What is the Council doing to support the Frank Gehry proposal for a Concert Hall in the Centre of Town with excellent public transport links, a proposal for underground parking etc. This would enrich Wimbledon, provide jobs to those living locally, add to revenues from restaurants, bars, etc improve varied culture activities over and above theatre, etc. Wimbledon deserves a proper, purpose built, Cultural Centre. It has waited decades. Now would seem to be the optimum time.	This is not a comment on the policy. Policy TC13.9 provides details on Culture, arts and tourism development, which would be applicable for any cultural facility proposed for planning. No changes required.
SM21	Survey Monkey	14 Infrastructure	IN14.3		There is a gap in provision of sporting facilities in the east of the borough and there may also be a reduction of playing fields as outlined by the current site plan. Longthornton and Pollards Hill residents in particular are affected. Consider outlining how the council will bridge the gap in this regard to provide physical facilities/infrastructure.	The council adopted the Merton Playing Pitch Strategy in 2019 and the Indoor Sports Facility Study was published in 2020. These documents were prepared in line with the Sport England guidance and provide relevant and up to date assessments of the current supply and future needs of sports facilities in the borough. These documents have informed the preparation of the Local Plan and will continue to be used to help assess relevant planning applications. No action required.

SM29	Survey Monkey	14 Infrastructure	IN14.1		14.1.1 What are the precise plans for additional health infrastructure? There is one main, over-extended, hospital on a site full of buildings - permanent, temporary, under construction. It lacks green space that used to be such a contributor to mental health & patient recovery. There will be demands re infrastructure for social care and mental health given the aging population and the impact of isolation during the virus. How are these to be handled? Will there be enough school places? If school are extended will there be enough teachers? Same question with respect to nurses. 14.1.4 To maintain a viable green infrastructure ALL green spaces currently extant need to be retained in their entirety. All parks, open spaces, metropolitan open land. None can be built on. None can be re-purposed (including the golf course in Wimbledon Park). 14.1.6 Where are additional areas for the provision of extra green space to be found if open spaces are to be built on? 14.1.7 Where will sufficient electrical charging points for cars be located? 14.1.20 Gas boilers are to be phased out. Will all new builds, extensions, changes of use, be required to reflect this and use alternative heating methods?	1. Education and health infrastructure requirements have been informed by information provided by the Merton Children Schools and Families team, the NHS, CCG and HUDU. This information has been based on assessments of future infrastructure need in Merton along with the housing growth that is to be provided through the Local Plan. The Local Plan does not provide specific information on nurses or teachers, these questions would need to be put to each of the relevant providers. 2. The policies relating to green infrastructure and open spaces are found in Chapter 15 Green and Blue Infrastructure. 3. The policies relating to green infrastructure and open spaces are found in Chapter 15 Green and Blue Infrastructure. 4. The policies relating to electric car charging are found in Chapter 16 Sustainable Travel. 5. The policies relating to low carbon energy are found in Chapter 2 Climate Change. No action required.
SM29	Survey Monkey	14 Infrastructure	IN14.3		14.3 (e) & 19 The AELTC has always been recognised as an international sports venue. Does it also provide a venue for local sport? 14.3.11 As before: All existing play space, open space, parks, communal spaces, metropolitan open land needs to be kept intact and open to the public. 14.3.12 There is limited space in Merton. Developers make profits from residential and business premises not play space. How can enough space be allocated and its provision ONLY as play space ensured. 14.3.14 Where? 14.3.17 Agreed	1. AELTC has not previously been recognised in a Merton Local Plan policy as an internationally significant sporting venue. 2. Policy IN14.3 encourages opportunities for play and requires all major residential development to provide on site play spaces for all ages, in line with the London Plan requirements. 3. Policy IN14.3(d) sets out the requirements for children's play space through development. Details of these spaces will be assessed through the planning application process. 4. This paragraph is referring to the preference for publicly accessible play space over spaces that are only privately accessible. 5. Support is noted. No action required.
SM38	Survey Monkey	14 Infrastructure	IN14.1		Wimbledon Station needs some serious money spent on it	Noted. This is not a comment on the policy. No action required
SM38	Survey Monkey	14 Infrastructure	IN14.2		Don't know.	Noted. This is not a comment on the policy. No action required
SM38	Survey Monkey	14 Infrastructure	IN14.3		Enough	Noted. This is not a comment on the policy. No action required
SM39	Survey Monkey	14 Infrastructure	IN14.1		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. Housing should be sympathetic and include minimum green space standards, including number of trees	Policies on green infrastructure are contained in Chapter 15. No action required.
SM39	Survey Monkey	14 Infrastructure	IN14.2		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies on green infrastructure are contained in Chapter 15. No action required.
SM39	Survey Monkey	14 Infrastructure	IN14.3		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies on green infrastructure are contained in Chapter 15. No action required.
SM01	Survey Monkey	15 Green and blue infrastructure	O15.4		While the sentiment may be appropriate, its relative weight needs to be considered carefully. Would the council be correct to refuse an otherwise policy compliant proposal on the basis of the loss of a C-rated tree? There is also a need for proportion and common sense in assessing when a full tree survey is actually required - common-sense is needed when considering low-biodiversity value leylandii cypress or developments whose impacts are clearly beyond any likely RPZ, rather than defaulting to consultants reports on what may be very small developments.	These comments are noted. Comments largely apply to how the policies will be applied to planning applications. No action required.
SM01	Survey Monkey	15 Green and blue infrastructure	O15.5		By making this issue openly measurable rather than subjective, this should be welcomed by both developers and conservation minded alike.	This policy is aligned with the London Plan policy on Urban Greening Factor, which provides a methodology and calculation for developers to use when submitting planning applications. Officers do not consider changes are required to this policy
SM05	Survey Monkey	15 Green and blue infrastructure	O15.3		The Woodland Trust generally supports this policy although we would like to see some specific targets set against the broad goals.	Support for this policy is noted. Policy O15.1 is a strategic policy that sets out the overarching green infrastructure priorities. Further details on the separate areas are found in the following policies O15.2, O15.3, O15.4, O15.5 and O15.6. The Council's AMR provides annual reports on monitoring in the borough, which includes elements of green infrastructure. Officers do not consider it necessary to add targets to the Local Plan
SM05	Survey Monkey	15 Green and blue infrastructure	O15.3		para d) add access to natural greenspace and woodland para f) add orchards	d. Officers have reviewed the policy wording. Woodland and other green spaces are designated as Open Space on the Policies Map. Therefore it is not necessary to add these words to the policy as they are already captured. f. Officers are not aware of any orchards within the borough that do not fall within designated Open Space and allotments. However, new supporting text has been added to identify that orchards are also areas set aside for food growing.
SM05	Survey Monkey	15 Green and blue infrastructure	O15.3		We support this policy but believe it should be strengthened by adding a target for biodiversity net gain. We support setting a greater than 10% target for net gain. By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice. We would also encourage considering development of a local metric for more urban/brownfield sites, such as the London Urban Greening Factor, because such sites may already have a very low level of biodiversity and therefore a percentage increase may not in practice deliver significant enhancements. Where net gain is delivered offsite, we urge that this is part of a comprehensive Nature Recovery Network approach that includes conservation, enhancement and connection of existing habitats, including ancient woodland.	1. Target for BNG - The Environment Bill sets a target for 10% minimum gain, which is likely to become mandatory for development in 2023. As there are a number of details still to be confirmed relating to the forthcoming biodiversity net gain statutory instruments, and given the council does not currently have detailed evidence to support a greater target, officers do not support a change to this policy at the current time. The council may develop further evidence over the coming years and is supportive of all development coming forward to meet the minimum net gains, at the very least. 2. Local UGF - Policy O15.5 sets out that major development must meet the London Plan Urban Greening Factor requirements and strongly encourages all other development to include urban greening. There is currently draft London Plan Guidance published for consultation on Urban Greening Factor, which provides further details on local requirements. Once this SPG has been finalised, the council will review local evidence with a view to providing further guidance on UGF for smaller developments.
SM05	Survey Monkey	15 Green and blue infrastructure	O15.4		We support this policy approach, and strongly support the requirement for native species (para f) and biosecurity (para g). These could be delivered by setting a requirement to use UK&Ireland sourced and grown stock (UKISG) wherever possible. We would like to see para e) strengthened with a requirement that that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted to achieve net gain and contribute to an overall uplift in tree canopy cover. We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016).	Support for this policy is noted. Para 15.4.16 sets out that British Standards should be followed. Officers do not recommend any further changes. Policy Para 15.4.11 sets out that suitable replacement planting should be in accordance with the London Plan Policy G7C. Officers do not recommend any further changes.
SM05	Survey Monkey	15 Green and blue infrastructure	O15.5		Strongly support this policy	Support for policy is noted. No action required.
SM05	Survey Monkey	15 Green and blue infrastructure	O15.6		Support this policy	Support for policy is noted. No action required.
SM07	Survey Monkey	15 Green and blue infrastructure	O15.3		15.3.19 Please add as a final sentence to this paragraph: "These features should be implemented in accordance with best practice guidance". Optionally, this should also state: ", with a minimum of one nest space provided per new dwelling, on average across the development". The reason for this request is that this paragraph 15.3.19 is welcome to implement the relevant policies of the London Plan 2021 and NPPG Natural Environment 2019, and in addition there is currently guidance by CIEEM (June 2019) and RIBA ("Designing for Biodiversity", 2nd edition 2013), which includes recommending 1 nest brick or box per new residential dwelling, on average, and this is expected to be formalised in the new British Standard BS 42021 ("Integral nest boxes. Design and installation for new developments") by 2022, so I believe it is important that developments follow this best-practice guidance.	Officers agree that it is important to make reference to best practice guidance and wording has been added to the supporting text.
SM09	Survey Monkey	15 Green and blue infrastructure	O15.1		We need to conserve as much green space as possible.	Noted. This is not a comment on the policy. No action required.
SM09	Survey Monkey	15 Green and blue infrastructure	O15.3		Massively important to the local community	Noted. This is not a comment on the policy. No action required.
SM09	Survey Monkey	15 Green and blue infrastructure	O15.4		More needs to be done to plant more trees and to look after those we have much better.	Noted. This is not a comment on the policy. No action required.
SM09	Survey Monkey	15 Green and blue infrastructure	O15.5		Green as much as possible	Noted. This is not a comment on the policy. No action required.
SM09	Survey Monkey	15 Green and blue infrastructure	O15.6		Needs to be conserved and maintained better	Noted. This is not a comment on the policy. No action required.
SM10	Survey Monkey	15 Green and blue infrastructure	O15.1		We support this policy to protect and enhance existing open space in the Borough.	Support for policy is noted. No action required.

SM10	Survey Monkey	15 Green and blue infrastructure	O15.2	<p>We support this policy to protect and enhance the existing public and private open space network in the borough. We object to the removal of "site 34 : 274-312 Cannon Hill Lane, Raynes Park" ("the site") from Open Space designation. We note that the land referred as "site 34 : 274-312 Cannon Hill Lane, Raynes Park" the Green Infrastructure, Biodiversity and Open Space Study is proposed to be removed from the "Open Space" designation.</p> <p>1. The open space designation is intended to protect areas of landscape, recreation, nature conservation and scientific interest which are strategically important. This is particularly relevant to this site as it adjoins the Open Space to the north. The supporting Ecological Appraisal to the tennis club application (reference: 18/P1024) stated that main areas of ecological value of the site were near the southern boundary of the site and related to bird nesting which is important particularly within such an urban area where nesting opportunities are limited. In allowing the permission, the Council considered that the air dome and maintenance building at the southern part of the site would be largely screened or comprise considerable separation distance from the site boundary. The design of the All England Lawn Tennis Club is set back from the southern boundary leaving a green corridor which has been reseeded with tall ruderal vegetation. These measures would provide a variety of habitats to improve biodiversity on site, including trees, flowers, planting box and hedge. The existing open land to the rear of 274-312 Cannon Hill Lane reinforces this green corridor providing important ecological value to wildlife and a buffer area with the residential uses to the south.</p> <p>2. The Environment Partnership (TEP) considered that the site is landlocked and does not offer any public accessibility. However, the Open Space Assessment advised that only "the total area of open space within Merton is approximately 1,329 hectares (13.2km²), which accounts for 35% of the borough. 793 hectares, 21% of the borough is publicly accessible open space. (paragraph 3.1 of the Open Space)." That implies 14% of the public space within the Borough is privately owned and therefore the site being privately landlocked does not justify the removal from the Open Space designation. It should be determined by the function and quality of the space.</p> <p>3. TES considered that the site does not provide any visual amenity. However, the site currently has an open feel and a natural outlook for existing houses along Cannon Hill Lane. The site, as commented by the residents along Cannon Hill Lane, does provide a visual amenity to the residents.</p> <p>4. The removal of this site would be contrary to paragraph 99 of the NPPF, Policy O15.2b and the recommendation in the Open Space Assessment. Paragraph 99 of the NPPF states: "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." The removal of the open space designation would represent a permanent loss. Without any replacement and the land is intended to be redeveloped for private use, the harm of a permanent loss would outweigh benefit of private housing, contrary to paragraph 99 NPPF. In addition, the conclusion of the Open Space Assessment (paragraph 5.4) said that "in some cases restrictions on loss of open space are entirely appropriate (for example protecting a designated landscape); but in other cases, there may be justification for loss of open space where improvements to the provision of open space can be made in other ways (for example through the regeneration of housing estates). Therefore, retaining the amount of open space through a 'no net loss' approach is a more pragmatic approach." In this situation, without any new/replacement open space, this would represent a</p>	<p>Support for this policy is noted and objection to the Policy Map is also noted.</p> <p>It should be noted that the site where the nursery is currently located, to the west of the P002 site, was also previously designated as Open Space in the same way as this site. This was reviewed and assessed through the previous Local Plan process and recommended that it be removed from the Open Space Policy Map.</p> <p>1. Open Spaces are designated on the Policies Map through the Local Plan process in accordance with the NPPF and London Plan. Criteria set out in the Green Infrastructure Study 2020 was used to assess sites in the borough. This site is not identified as part of a SINC or Green Corridor and neither is any of the neighbouring or adjoining land. While the neighbouring land may have</p> <p>2. As defined in the new Local Plan, open space covers a broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted. However, sites must meet a set of criteria to be considered appropriate for designation. Officers do not consider that this site meets this criteria.</p> <p>3. While visual amenity is an important function of many green spaces throughout the borough, it is not a sole determinant of whether a parcel of land should be designated as open space.</p> <p>4. NPPF 99 is a consideration for planning applications, not Local Plan reviews. Paragraph 98 of the NPPF identifies that "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities". The Green Infrastructure Study 2020 is the council's up to date open space assessment. Local Plan policies are to be applied to planning applications. There is a separate process for determining any changes to the Policies Maps, which is through a Local Plan review.</p> <p>Officers do not recommend any changes.</p>
SM11	Survey Monkey	15 Green and blue infrastructure	O15.1	<p>Policy O15.1 states the following: "Open Space, Green Infrastructure and Nature Conservation Access to open spaces and green infrastructure plays an important role in the physical and mental health and wellbeing of all people. We aim to ensure Merton remains an attractive and green borough, through the protection and enhancement of open spaces, green infrastructure and the natural environment. We will do this by: a. Protecting and enhancing open spaces in the borough including Metropolitan Open Land, parks, other open spaces and areas of nature conservation to provide high quality environments for all residents; b. Protecting and seeking improvements to walking and cycling routes to and through green spaces; c. Enhancing existing open spaces, green corridors and the natural environment, providing habitats for biodiversity to flourish and expand; d. Protecting and enhancing the borough's biodiversity, particularly on sites of recognised nature conservation interest, and supporting the objectives of the Mayor's Environment Strategy; e. Increasing green infrastructure across the borough through urban greening; ..." We, residents, general public, have become aware, without any formal consultation or notification, that the land to the rear of Cannon Hill Lane 312 – 274 (P002), is proposed in the Local Plan to have its Open Space designation removed. The Local Plan shows that this piece of land no longer has its Open Space designation, which it has always had. This piece of land is a green, open, undeveloped, home to thousands of natural species, is an important ecological corridor, helps to provide us with clean air, helps to mitigate climate change, helps to mitigate the alarming rise in flooding instances, provides a visual amenity to residents, helps with mental wellbeing. It needs to be noted that the private owner of the land is the one who requested for the Open Space designation to be removed. The owner of the land wants to build two double storey houses, for his immediate family and apparently, for his parents who will relocate from Singapore. The owner is a successful entrepreneur and portrays himself as nature loving, even though he is happy to dig up and ruin this beautiful piece of land. I have seen him driving over the protected roots of the oak tree on the neighbouring nursery's land – who are doing what they can to protect it. The land owner has also been clearing the land through burning – one of the least environmentally friendly methods (air pollutant and emissions). The land owner's planning application also excluded two protected trees. The owner is continuing with his plan to build and ruin the neighbourhood, as well as the nursery business, with which the land owner shares access to his land. The owner demonstrates to us by his actions that he is not concerned with nature or the residents, or a thriving local business serving the community, and is in this for self-gain at the expense of the environment and the community. Why Merton Council appears to support this, is not clear, and calls into question their integrity, which should be taken into account when approving their Local Plan. It is a surprise and disappointment to many of us who previously respected our local council and their policies. The fact that they have included the land owner's proposal to remove Open Plan status, based on flimsy and weak arguments, which is in direct contravention of the policy above, shows either a very worrying level of incompetence or unfortunately leads us to believe that they have been paid to let this go through. There is no point having this new Local Plan if the Council doesn't actually believe in it and follow it. The proposal to remove "Open Space" status is a direct contravention of the policy stated above. As follows: "Access to open spaces and green infrastructure plays an important role in the physical and mental health and wellbeing of all people. We aim to ensure Merton remains an attractive and green borough, through the protection and enhancement of open spaces, green infrastructure and the natural environment." The residents of Cannon Hill Lane have visual access to this lovely piece of green land. The new Local Plan even states "New Local Plan (p507): 15.2.1. Open space can be multi-functional; people use green and open spaces for many purposes including exercise, play, food growing, socialising and leisure. Visual accessibility is equally as important as physical access. The protection and enhancement of open spaces enables the provision of</p>	<p>This objection is noted.</p> <p>Any comments made in relation to a current Planning Application are not relevant to this response. These will be dealt with through the assessment of the Planning Application.</p> <p>This site is not identified as part of a SINC or Green Corridor and neither is any of the neighbouring or adjoining land. The adjoining parcel of land which now contains a nursery was also previously designated as Open Space alongside the AELTC site and this site being referred to. That land was removed from Open Space through the last Local Plan review. Ecological assessments carried out as part of the approved planning application 18/P1024 for the neighbouring AELTC site identified dense ivy along the boundary of the site which may be of importance to nesting birds. The AELTC site is providing a number of ecological enhancements including bird and bat boxes which will assist in enhancing the value of the AELTC site for wildlife.</p> <p>The preparation for the new Local Plan began in 2017 and a number of borough wide consultation rounds have taken place since. The Green Infrastructure Study 2020 was published on the Council's Local Plan Research webpage in August 2020 and has informed the preparation of the green infrastructure policies and maps for the new Local Plan. Both the Stage 2a consultation undertaken between November 2020 and February 2021 and the Stage 3 consultation undertaken between July and September 2021 included the proposed changes to the Policies Maps, including this site. Consultation methods for the local plan included emails to all people who have signed up to the Local Plan consultation database, publication in the My Merton magazine, which is delivered to every household in the borough and emailed to those who have requested email updates, and various social media updates including via the Council's Twitter and Facebook pages. Officers consider that the consultation process for the new Local Plan has been wide ranging and has used a variety of methods to notify as many residents and other interested parties as possible</p> <p>Policy O15.1 will be applied to development that comes forward through planning applications. This policy is not applicable when making assessments of open space policy map designations. Any changes to the open space designations on the Policies Map, including this site, have been informed by a review of the open space criteria set out in the Green Infrastructure Study 2020. Officers do not recommend any</p>
SM11	Survey Monkey	15 Green and blue infrastructure	O15.2	<p>Policy O15.2 states "Open Space and Green Infrastructure We place a high value on green infrastructure and open spaces, as they make a significant contribution to the health (including mental health) and wellbeing of Merton residents, contribute to social cohesion and mitigate some of the impacts of climate change. We aim to protect and enhance our open spaces and to improve accessibility to open space. We will: a. Protect and enhance the borough's public and private open space network including protecting Metropolitan Open Land (MOL) and designated open spaces from inappropriate development in accordance with the London Plan and government guidance."</p> <p>Again, Merton Council is going directly against their own plan by removing Open Space status of the land in question. The housing provision policy seeks to make housing affordable and accessible. The current plans for developing this piece of land including the build of two double storey houses. It will cost at least £2m. It is unlikely that these houses will be affordable. Ironically, they are also not very accessible in reality too since access is shared with the nursery. This is another direct contravention of the proposed Local Plan.</p>	<p>The Local Plan process has undertaken a number of consultation rounds since October 2017. The Green Infrastructure Study 2020 was published on the Council's Local Plan Research webpage in August 2020 and has informed the preparation of the green infrastructure policies and maps for the new Local Plan. Both the Stage 2a consultation undertaken between November 2020 and February 2021 and the Stage 3 consultation undertaken between July and September 2021 included the proposed changes to the Policies Maps, including this site.</p> <p>Any changes to the open space designations on the Policies Map, including this site, have been informed by a review of the open space criteria set out in the Green Infrastructure Study 2020. Officers do not recommend any changes.</p> <p>Any planning applications are separate from the preparation of the Local Plan policies. Officers therefore will not comment on any responses relating to a planning application.</p>
SM11	Survey Monkey	15 Green and blue infrastructure	O15.4	<p>Policy O15.4 states "We are committed to protecting trees and enhancing other features of the natural environment." The Council is not committed to this. Removing Open Space status of Site P002 will lead to less protection of trees. The land owner has already cut down a many small trees and is already seen driving over the roots of protected oak tree in his big car.</p>	<p>The policies set out in the new Local Plan will be used to assess planning applications once the Local Plan has been through an Examination in Public and has been adopted. The proposed de-designation of open space through the Local Plan process does not mean that Policy O15.4 would not be applicable to any future planning application. No changes are recommended.</p>
SM15	Survey Monkey	15 Green and blue infrastructure	O15.1	<p>O 15.1 Astro turf has been used around the back of Raynes Park in a small area. Whilst I applaud this attempt to improve the environment; I prefer real grass and more initiative could be invoked to use other waste areas, transforming them into small places where trees grow and birds can live</p>	<p>Noted. This is not a comment on the policy. No action required.</p>
SM15	Survey Monkey	15 Green and blue infrastructure	O15.4	<p>Trees were cut down along the railway line at the end of Elm Grove. The building site currently boasts not a blade of grass. How come?</p>	<p>Noted. This is not a comment on the policy. No action required.</p>
SM15	Survey Monkey	15 Green and blue infrastructure	O15.5	<p>O 15.5 A huge expanse of paving lies outside the relatively new Nelson Medical Practice. So often it is paving which wins over grass or other natural choices.</p>	<p>Noted. This is not a comment on the policy. No action required.</p>
SM16	Survey Monkey	15 Green and blue infrastructure	O15.6	<p>The plans to develop colliers wood will be bad for the Sandler valley; so should be limited.</p>	<p>Noted. This is not a comment on the policy. No action required.</p>
SM25	Survey Monkey	15 Green and blue infrastructure	O15.2	<p>Policy O15.2 Policy Omission The policy omission relates to consideration of impacts of development outside the open space on the design of the open space, the experience of being within the space and on views from within looking out and from outside looking in. Such impacts could be loss of tranquillity, daylight, outlook, air quality, micro-climatic effects, overshadowing and amenity. Insert the impact of development on views and the setting of open spaces should be carefully managed to maintain the character and enjoyment of these spaces.</p>	<p>This comments is a duplicate from the London Gardens Trust submission. See row 23.</p>
SM26	Survey Monkey	15 Green and blue infrastructure	O15.1	<p>3.172 involves removing open space. I object to this de-registration.</p>	<p>This objection is noted. This respondent has also provided a written submission which covers the same issues. Detailed responses have been provided in the rows above</p>
SM26	Survey Monkey	15 Green and blue infrastructure	O15.2	<p>3.172 involves removing open space. I object to this de-registration.</p>	<p>This objection is noted. Refer to the response in row 355.</p>

SM26	Survey Monkey	15 Green and blue infrastructure	O15.3		3.172 involves removing open space. I object to this de-registration.	Noted. Policy O15.3 refers to Biodiversity. Proposed changes to the Policies Map are separate to this policy. No action required.
SM26	Survey Monkey	15 Green and blue infrastructure	O15.4		3.172 involves removing open space. I object to this de-registration.	Noted. Policy O15.4 refers to the Protection of Trees. Proposed changes to the Policies Map are separate to this policy. No action required.
SM26	Survey Monkey	15 Green and blue infrastructure	O15.5		3.172 involves removing open space. I object to this de-registration.	Noted. Policy O15.5 refers to Urban Greening. Proposed changes to the Policies Map are separate to this policy. No action required.
SM29	Survey Monkey	15 Green and blue infrastructure	O15.1		15.1 (a) Open spaces need to be protected, enhanced & RETAINED in their entirety. 15.1.2 The 1300 hectares of open land which provide 35% of space in Merton need to be retained so that the 1300 hectares is not diminished by 1 hectare.	1. The policies on open space are in accordance with the NPPF and London Plan requirements. Further details are found in Policy J15.2. 2. The policies on open space are in accordance with the NPPF and London Plan requirements. Further details are found in Policy J15.2. No action required
SM29	Survey Monkey	15 Green and blue infrastructure	O15.2		15.2 (b) Open Space should NOT be built on. It cannot be surplus to requirements given the stated shortage of play spaces for children etc. If it is not suitable for a play space use it to plant trees to offset carbon emissions. Never build on green spaces, open spaces, parks, metropolitan open land, etc. 15.2 (iii) if this refers to the requirements of the AELTC what is proposed will, undoubtedly, benefit the AELTC. How will it benefit those using Wimbledon Park? Those living close to it? The Capability Brown heritage? No part of this park should be built on. It should be enhanced as a public open space with full access to the public at all times except, perhaps, whilst the tennis is in progress when it might become an open car parking facility but remain a green, and open, space. 15.2 (c) Hopefully no permissions will be granted so this section will be redundant. Please. 15.2 (d) How does one CREATE "new publicly accessible open space"?	1. The policies on open space are in accordance with the NPPF and London Plan requirements. The policy supports the protection and enhancement of open space, in accordance with the NPPF. 2. These questions relate to a specific site allocation. The AELTC site allocation will be subject to a planning application process which will determine whether the proposal meets the relevant planning policies. 3. Noted. Any planning applications will be determined through the development control process. 4. New publicly accessible open space may be created through major development proposals, which could result in new areas being made available to the public for recreation and leisure uses. Details would be agreed through a planning application. No action required.
SM29	Survey Monkey	15 Green and blue infrastructure	O15.3		15.3 Public access to nature and green spaces is to be encouraged. No spaces currently open should be built on and, thus, not be available to provide access to nature.	Policy O15.3 seeks to protect sites that have been recognised for their nature conservation interest and also expects development on sites that have been identified as deficient in access to nature to improve nature conservation and accessibility to SINC's. No action required
SM29	Survey Monkey	15 Green and blue infrastructure	O15.4		Trees need to be planted. Trees should only be cut down when they are a danger to the public. The Green Canopy which is being encouraged to celebrate the Queen's jubilee next year should mean we all plant trees and none are cut down to make room for buildings or any re-purposing of open spaces.	Policy O15.4 supports the retention of trees and expects developments to plant additional trees to maximise the green infrastructure network. No action required.
SM29	Survey Monkey	15 Green and blue infrastructure	O15.5		15.5 Keep Merton as Green as it is in all area.	Noted. This is not a comment on the policy. No action required.
SM31	Survey Monkey	15 Green and blue infrastructure	O15.4		You give no protection for trees You appear to have a policy of destruction of trees	Policy O15.4 sets out a number of policies which encourage and support the protection of trees, planting of additional trees and the retention of trees and other landscape features. No action required
SM34	Survey Monkey	15 Green and blue infrastructure	O15.3		Merton New Local Plan Publication Stage 3 Biodiversity Net Gain: p 515 5.3.19. Development.....should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications. Comment: Although the specific reference to integrated swift bricks and boxes is most welcome, please add a requirement for developers to follow best practice guidance principles. This will ensure an acceptable standard of biodiversity enhancement, and prevent ineffective biodiversity gestures by developers. Density of swift bricks, best practice guidance, including densities: Swift bricks should be installed in the following densities: One nest brick per residential unit. One nest brick per six square metres of wall, on commercial buildings. Please see: The Chartered Institute of Ecology and Environmental Management Journal, Issue 104 June 2019: https://cieem.net/resource/the-swift-a-bird-you-need-to-help/ And https://swift-conservation.org/universal_swift_nest_brick02.pdf	This is repeated in the Wimbledon Swifts Stage 3 submission. Refer to response in row 339.
SM38	Survey Monkey	15 Green and blue infrastructure	O15.1		Keep or increase	Noted. This is not a comment on the policy. No action required.
SM38	Survey Monkey	15 Green and blue infrastructure	O15.2		As in P47	Noted. This is not a comment on the policy. No action required.
SM38	Survey Monkey	15 Green and blue infrastructure	O15.3		More	Noted. This is not a comment on the policy. No action required.
SM38	Survey Monkey	15 Green and blue infrastructure	O15.4		Plant more and protect the ones already here	Noted. This is not a comment on the policy. No action required.
SM38	Survey Monkey	15 Green and blue infrastructure	O15.5		More	Noted. This is not a comment on the policy. No action required.
SM39	Survey Monkey	15 Green and blue infrastructure	O15.1		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies O15.1 and O15.2 seek to protect and enhance open spaces in the borough. Policies O15.3, O15.4 and O15.5 seek to protect biodiversity, nature conservation and trees, and encourage urban greening. No further action required.
SM39	Survey Monkey	15 Green and blue infrastructure	O15.2		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies O15.1 and O15.2 seek to protect and enhance open spaces in the borough. Policies O15.3, O15.4 and O15.5 seek to protect biodiversity, nature conservation and trees, and encourage urban greening. No further action required.
SM39	Survey Monkey	15 Green and blue infrastructure	O15.3		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies O15.1 and O15.2 seek to protect and enhance open spaces in the borough. Policies O15.3, O15.4 and O15.5 seek to protect biodiversity, nature conservation and trees, and encourage urban greening. No further action required.
SM39	Survey Monkey	15 Green and blue infrastructure	O15.4		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies O15.1 and O15.2 seek to protect and enhance open spaces in the borough. Policies O15.3, O15.4 and O15.5 seek to protect biodiversity, nature conservation and trees, and encourage urban greening. No further action required.
SM39	Survey Monkey	15 Green and blue infrastructure	O15.5		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies O15.1 and O15.2 seek to protect and enhance open spaces in the borough. Policies O15.3, O15.4 and O15.5 seek to protect biodiversity, nature conservation and trees, and encourage urban greening. No further action required.
SM39	Survey Monkey	15 Green and blue infrastructure	O15.6		Absolutely. There is minimal if zero reference to the need to protect and actually encourage the greening of the borough. More green spaces are needed and should be protected	Policies O15.1 and O15.2 seek to protect and enhance open spaces in the borough. Policies O15.3, O15.4 and O15.5 seek to protect biodiversity, nature conservation and trees, and encourage urban greening. No further action required.
SM05	Survey Monkey	15 Green and blue infrastructure	F15.7		Support paras d and f to use natural solutions as part of an integrated blue and green infrastructure approach.	Support noted
SM11	Survey Monkey	15 Green and blue infrastructure	F15.7		Policy F15.7 states "As a Lead Local Flood Authority, we will work in partnership with the Environment Agency, water companies, developers, neighbouring boroughs and local communities to manage and reduce flood risk from all sources. We will: a. Steer development towards areas at lowest risk of flooding from all sources through the application of the sequential test, as set out in the National Planning Policy Framework (NPPF) and supporting national Planning Practice Guidance; assess the cumulative impact of development and land use change; and make strategic planning decisions using the most up-to-date flood risk data and information from Merton Council, the Environment Agency, other Risk Management Authorities (RMAs) and the National Flood and Coastal Erosion Risk Management Strategy for England (2020). f. Reduce the risk of flooding (from all sources) in an integrated way through coordination with the following local plan policies: –Open Space and Green Infrastructure; Urban Greening; Managing Local Flooding; Sustainable Drainage Systems; Placemaking and Design." The flooding we as residents have experienced will be exacerbated if Open Space status is removed. My garden has flooded significantly. If the land is built on, this will create a potentially dangerous flooding situation in our properties. I have spent money trying to reduce my flooding issue but I am doing this in vain if the Council makes decisions that make flooding worse! The land in question is in a Flood Risk Zone 2. Again the Council is going against its own Local Plan by removing Open Space status.	The council has worked, and continues to work with the Environment Agency and water companies, in the preparation of the Local Plan. This is to ensure that all necessary flood infrastructure considerations are identified so that development does not adversely impact on residents. Officers do not consider any changes are needed to the policies.
SM16	Survey Monkey	15 Green and blue infrastructure	F15.7		The plans not build more around colliers wood station will increase the risk of homes being affected by flooding . There should be more provision for flood zones / flooding areas.	The council has worked, and continues to work with the Environment Agency and water companies, in the preparation of the Local Plan. This is to ensure that all necessary flood infrastructure considerations are identified so that development does not adversely impact on residents. Officers do not consider any changes are needed to the policies.

SM05	Survey Monkey	15 Green and blue infrastructure	F15.9		Support, particularly para c) recognising the role of trees in SUDS.	Support noted
SM16	Survey Monkey	15 Green and blue infrastructure	F15.10		Do not put more homes near colliers wood station or high road. You are exposing more people to pollution and bad air quality.	Development proposals have to consider the policies within the London Plan and this policy on air quality. No changes are proposed in line with this submission
SM11	Survey Monkey	15 Green and blue infrastructure	F15.10		Removing Open Space status of green land results in worsening air quality and increased pollution. Not improvement. We sincerely hope that the Council has enough knowledge (this is very basic knowledge) to know that green space is helping to provide good air quality and therefore, that removing green open space, will reduce it. How will the council make up the worsened air quality if they decide to remove Open Space status of site P002? Why do they want to make their task harder?	The review of the open space sites on the policies map has taken place through the Green Infrastructure Study and further officer assessments. Any changes have been recommended in line with a set of criteria. No changes proposed.
SM05	Survey Monkey	15 Green and blue infrastructure	F15.10		Support para g v. The use of green infrastructure, including trees and hedgerows to reduce the exposure to air pollution to absorb dust and other pollutants.	Support noted
SM06	Survey Monkey	16 Transport	T16.4		As part of Merton Council's Good Growth Strategy, the need is mentioned to "move away from petrol and diesel cars" and for "more electric vehicle charging points" (CH 01b, 10). A commitment is shown to "encourage and enable travel behavioural changes by providing electric car charging points" in Wimbledon (CH 01b, 19), Colliers Wood (CH 01b, 19) and Wimbledon Village (CH 01b, 24). We appreciate these commitments and understand the need to enhance and expand the existing charging infrastructure available to residents who have already switched to electric vehicles and to those who are planning to do so in the near future. Policy T16.4 on Parking and Low Emissions Vehicles, at Point e, mentions that "on-site car parking should provide adequate suitable infrastructure for the charging of electric vehicles, in accordance with London Plan standards as minimum" (p. 571). As numerous influential reports and strong evidence (see Delta-ee 2021) points to public on-street charging is key to allow a shift to electric vehicles, we believe this policy requirement should be enhanced. Merton is a central London borough with 1 car registered every 3 inhabitants and with a percent of terrace and flats that reaches 75% of all housing options in the council. This means that 75% of residents are not likely to have a driveway or a garage where they could charge their electric vehicles and will necessarily rely on on-street public charging. Based on the evidence cited above, we estimate that Merton will need 953 on-street fast charging points by the end of 2025 in order to allow these residents to switch to electric vehicles. Even if the current policy goes in the overall right direction, the evidence highlighted above and a number of other key reports point out it will not be enough to provide the conditions to meet the needs of these residents. Therefore, we strongly believe the council should be making a stronger case for on-street charging points within the framework of Policy T16.4 in order to create the necessary conditions for developers and key stakeholders to work with the council to address the demand for on-street charging points.	The Transport policies set out that EV charging infrastructure is an important focus area for the council. The Infrastructure Delivery Plan identifies this as one of the projects to be brought forward in the first 5 years of the Local Plan period, subject to funding. No further changes proposed.
SM13	Survey Monkey	16 Transport	T16.1		Housing density is the single biggest predictor of walking trips according to Department for Transport research, and the second most for cycling trips but this policy makes no attempt to reflect how maximising density reduces distances to amenities by increasing viability and improves cycling and walking participation as well as reducing car dependency. This needs to be rectified	This is covered in the housing policies and the London Plan, which aim to optimise residential development around transport hubs. The Local Plan also refers to the 20 minute neighbourhood approach. No changes required.
SM15	Survey Monkey	16 Transport	T16.5		T 16.5 Transport in Wimbledon is excellent!	Support noted
SM29	Survey Monkey	16 Transport	T16.1		16.1 (c) The report acknowledges an increase in the elderly population of Merton (both 65+ and 85+). Sustainable travel sounds great but not all elderly, disabled, etc can walk, cycle, or use public transport with ease. How are they to be catered for within this plan/policy? 16.1.1 Transport volume increase because there is not enough public transport, train fares are too high, it is not convenient to wait in the cold and wet, etc. 16.1.2 Favouring "active, efficient and sustainable modes of travel" is fine for the young and the able bodied. What allowances are to be made for the disabled, mothers with prams, those in wheelchairs, the elderly, etc without discriminating against them or singling them out, embarrassingly, for different treatment? Diversity has to include those less, or differently, abled. Cars provide a freedom which other modes do not. 16.1.5 Again this discriminates against the elderly and differently abled. 20 minutes or 2 minutes are as restrictive if you lack mobility. 16.1.7 Reduce taxi fares to enable people to get home after the theatre and encourage less reliance on private vehicles. 16.1.9 Remote working may suit some businesses but not all and should not be relied upon to reduce travel long term. 16.1.9 Yes if one shops online one needs to have the good delivered.	Polices in the Health and Wellbeing Chapter 10 and Design Chapter 12 set out that neighbourhoods should be inclusive and accessible to all. Officers have worked with community bodies to help identify areas where policies could be strengthened. Transport schemes that come forward also need to accord with government guidance on accessibility. No further changes are proposed.
SM29	Survey Monkey	16 Transport	T16.2		16.2 This only works for the young, the fit, the able bodied. It discriminates against the elderly, the disabled, etc.	Active travel covers a variety of means of travel. This policy identifies that currently there are a number of locations in the borough that are not of an adequate standard, and proposes upgrades and improvements to ensure that barriers are removed. Officers do not propose any further changes
SM39	Survey Monkey	16 Transport	T16.4		parking surcharge on diesel is scientifically proven to be wrong. it should be removed immediately. on screen charging ports for EVs need to be installed in lampposts	Paragraph 16.4.14 refers to a government strategy on increasing the number of electric vehicles and ending the sale of new petrol and diesel cars by 2030. Officers do not propose any changes
SM02	Survey Monkey	16 Transport	T16.5		Para 17.5.6. Can Merton Council stop publishing active travel shelfware and actually start delivering networks that are actually useful? There is no need for yet-another-cycling strategy by 2023 - the council has prepared lots of them over the last 10-12 years and failed to deliver them e.g. LIP2 "borough biking strategy", LIP3's commitment (which incidentally included far better transport maps than those included with this iteration of the Local Plan). And dig out the "Cycle Skills Network Audit - Merton" report from 2012 written by Brighton's Transport Initiatives LLP, which recommended strategic routes with the necessary interventions - largely ignored by Merton's leadership ever since. The quietway schemes such as the Colliers Wood - Morden - Sutton route have received lots of money to pay Sustrans, with nothing being delivered. Hiring consultants to write glossy PDFs is easy - but all this stuff proposed in the Local Plan about sustainable travel is just virtuous nonsense unless councillors and officers deliver it.	The Local Plan includes references to active travel strategies, often prepared in conjunction with TfL and the GLA as part of London wide initiatives. Due to the nature and scale of these projects, they require funding which does not always come forward as expected. References to these schemes are necessary within the London Plan to ensure infrastructure needs are identified. No changes proposed.
SM38	Survey Monkey	17 Appendices	Appendices		Should be encouragec	Noted. This is not a comment on the policy. No action required
SM10	Survey Monkey	Policies Map	Policies Map		Stage 3 - Green Infrastructure Policies Map 2 We object to the removal of "site 34 : 274-312 Cannon Hill Lane, Raynes Park" ("the site") from Open Space designation. We note that the land referred as "site 34 : 274-312 Cannon Hill Lane, Raynes Park" in the Green Infrastructure, Biodiversity and Open Space Study is proposed to be removed from the "Open Space" designation. 1.The open space designation is intended to protect areas of landscape, recreation, nature conservation and scientific interest which are strategically important. This is particularly relevant to this site as it adjoins the Open Space to the north. The supporting Ecological Appraisal to the tennis club application (reference: 18/P1024) stated that main areas of ecological value of the site were near the southern boundary of the site and related to bird nesting which is important particularly within such an urban area where nesting opportunities are limited. In allowing the permission, the Council considered that the air dome and maintenance building at the southern part of the site would be largely screened or comprise considerable separation distance from the site boundary. The design of the All England Lawn Tennis Club is set back from the southern boundary leaving a green corridor which has been reseeded with tall ruderal vegetation. These measures would provide a variety of habitats to improve biodiversity on site, including trees, flowers, planting box and hedge. The existing open land to the rear of 274-312 Cannon Hill Lane reinforces this green corridor providing important ecological value to wildlife and a buffer area with the residential uses to the south. 2. The Environment Partnership (TEP) considered that the site is landlocked and does not offer any public accessibility. However, the Open Space Assessment advised that only "the total area of open space within Merton is approximately 1,329 hectares (13.2km²), which accounts for 35% of the borough. 793 hectares, 21% of the borough is publicly accessible open space. (paragraph 3.1 of the Open Space)." That implies 14% of the public space within the Borough is privately owned and therefore the site being privately landlocked does not justify the removal from the Open Space designation. It should be determined by the function and quality of the space. 3. TES considered that the site does not provide any visual amenity. However, the site currently has an open feel and a natural outlook for existing houses along Cannon Hill Lane. The site, as commented by the residents along Cannon Hill Lane, does provide a visual amenity to the residents. 4. The removal of this site would be contrary to paragraph 99 of the NPPF, Policy O15.2b and the recommendation in the Open Space Assessment. Paragraph 99 of the NPPF states: "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." The removal of the open space designation would represent a permanent loss. Without any replacement and the land is intended to be redeveloped for private use, the harm of a permanent loss would outweigh benefit of private housing, contrary to paragraph 99 NPPF. In addition, the conclusion of the Open Space Assessment (paragraph 5.4) said that "in some cases restrictions on loss of open space are entirely appropriate (for example protecting a designated landscape); but in other cases, there may be justification for loss of open space where improvements to the provision of open space can be made in other ways (for example through the regeneration of housing estates). Therefore, retaining the amount of open space through a 'no net loss' approach is a more pragmatic approach." In this situation, without any new/replacement open space, this would represent a net loss in the Raynes Park area. The removal of the site from open space designation would be contrary to Policy O15.2a which seek sot protect and enhance the borough's public and private open space.	This is repeated in row 355 - refer to response above.
SM11	Survey Monkey	Policies Map	Policies Map		Policy O15.3 states: "We are committed to protecting and enhancing biodiversity, particularly on sites of recognised nature conservation. The protection and enhancement of biodiversity in urban areas such as Merton is important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature. Protecting biodiversity and the wider natural environment can have a variety of significant positive impacts including strengthening wildlife movement and connections, improving health and mental wellbeing of residents, contributing to climate change adaptation and improving quality of life." This land (Site P002) has rich biodiversity. Or, it did have, before the land owner started clearing it and burning. It can be argued that Open Space status should be replaced with "Green Corridor" or "Site of ecological significance". This land is important for wildlife movement, as it is an ecological corridor. This will be completely removed if Open Space status is removed. You will not be strengthening wildlife movements and connections – you will be destroying it. As stated in the policy, this needs to be protected from development!	The site is not identified as part of a SINC or Green Corridor and neither is any of the neighbouring or adjoining land. Ecological assessments carried out as part of the approved planning application 18/P1024 for the neighbouring AELTC site identified dense ivy along the boundary of the site which may be of importance to nesting birds. The AELTC site is providing a number of ecological enhancements including bird and bat boxes which will assist in enhancing the value of the site for wildlife.

SM11	Survey Monkey	Policies Map	Policies Map		Raynes Park. Removal of Open Space status of Site P002. It makes no sense to remove the Open Space status of a green, open piece of land, for all reasons mentioned. It goes directly against the Council's Local Plan, unfortunately reducing it a laughing stock.	The Local Plan process has undertaken a number of consultation rounds since October 2017. The Green Infrastructure Study 2020 was published on the Council's Local Plan Research webpage in August 2020 and has informed the preparation of the green infrastructure policies and maps for the new Local Plan. Both the Stage 2a consultation undertaken between November 2020 and February 2021 and the Stage 3 consultation undertaken between July and September 2021 included the proposed changes to the Policies Maps, including this site. Any changes to the open space designations on the Policies Map, including this site, have been informed by a review of the open space criteria set out in the Green Infrastructure Study 2020. Officers do not recommend any changes.
SM15	Survey Monkey	Policies Map	Policies Map		The Maps are hard to decipher. However, it is one thing to state that quality and sustainability are the catch words and another to deliver.	Noted. Officers will review the maps to see if any changes can be made for clarity. We are working towards having an online version of the Policy Maps once the Local Plan is adopted.
SM20	Survey Monkey	Policies Map	Policies Map		Yes - omission of a site to the rear of Dawlish Avenue. This site should be shown as an allocation for housing.	No further change proposed. Site W17 to the rear of Dawlish Avenue is included; Wellington Works has been proposed for allocation by another representor but will not be included in this local plan.
SM38	Survey Monkey	Policies Map	Policies Map		Don't know	Noted. This is not a comment on the policy. No action required.
SM33	Survey Monkey	Policies Map	Policies Map		Paragraph 3.4. I am the owner of 4 Clockhouse Close and can confirm that all of the rear gardens of the houses on Clockhouse Close contain several mature and semi-mature trees. Therefore Clockhouse Close should not be removed from the Green Corridor.	We welcome the biodiversity value of rear gardens and other green spaces throughout the borough. It should be noted that Tree Protection Orders can be made for any trees that require protection. This site was reviewed by TEP and recommended to be removed from Green Corridor in line with the criteria set out in the Green Infrastructure Study 2020. This removal of the designation from the Policies Map does not mean the council is proposing to change the nature of these trees on private land. Officers have reviewed the assessment for this site and do not recommend any further changes.