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10		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.3	MM112	<p>WIMBLEDON PARK HOUSE: ARCHAEOLOGICAL PRIORITY ZONE (APZ) The entirety of Wimbledon Park is located with the APZ however there is no reference to this in the policy. The APZ was previously referenced in the former wording of Site Allocation W13 (now correctly removed). Our client has no particular position on whether this should be referred to in the policy but we raise as a consideration for the Council.</p> <p>SUPPORTING TEXT We propose modifications to Paragraph 8.1.3 to give greater clarity over the status of the land. <b>We propose the following text:</b> <b>'Wimbledon Park, Registered Park and Garden, is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of the RPG is owned by Merton Council is currently publicly accessible. The All England Lawn Tennis Club's ownership concerns the former private Wimbledon Park Golf Club, who had been the leaseholders of the site since 1898 and this land is not publicly accessible. The AELTC's main grounds lies to the west of the RPG across Church Road and the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. The Wimbledon Club is a private sports club and is not publicly accessible. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park. In 2016, the Registered Park and Garden was added to Historic England's "Heritage at Risk" register.' With this amendment, paragraph 8.1.14 could be deleted</b></p>	No change proposed: - paragraph 8.1.4 refers to the whole of Wimbledon Park being part of a Tier 2 archaeological priority area - paragraphs 8.1.13 and 8.1.14 cover land ownership issues
11		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.7	MM112	Paragraph 8.1.7 of the text refers to Paragraph 98 of the NPPF 2023. This should now be altered to Paragraph 102. The rest of the text remains unaltered.	Amendment proposed to MM112 para 8.1.7 to update reference to correct NPPPF paragraph now 102
12		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.9	MM112	We suggest additional clarity via alterations to the final sentence to Paragraph 8.1.9: This policy supports the provision of well-maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support <b>increased public access</b> to and enjoyment of <b>the Registered Park and Garden</b> for people of all ages and abilities	Amendment proposed to MM112 last sentence of paragraph 8.1.9 "....to support <b>increased public access</b> to, and enjoyment of, <b>more of Wimbledon Park</b> for people of all ages and abilities." The phrase Registered Park and Garden is not proposed to be used as part of the Registered Park and Garden lies with the London Borough of Wandsworth as local planning authority and so is not covered by this policy.
13		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.10	MM112	Paragraph 8.1.10 refers to 'replacing non-native with native species.' Our client agrees with this general sentiment, however with climate change it is becoming increasingly necessary to adapt landscapes, for instance by introducing more drought resistant species that may not necessarily have been a native species. We suggest a minor modification to this text, namely 'replacing <b>inappropriate</b> non-native with native species <b>and/or introducing appropriate and justified climate resilient species.</b> '	Amendment proposed to MM112 so plan is justified: part (g) g. <b>Consider the removal of insensitive tree and inappropriate non-native planting, particularly on the former golf course and around the athletics track.</b> para 8.1.10 There is also potential to improve biodiversity resilience by better habitat management, for example, addressing the poor condition of the lake, removing recent planting located too close to veteran trees, replacing <b>inappropriate non-native</b> with native or <b>appropriate and justified climate-resilient species</b> , and reducing pollutants in grassland management.
14		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.11	MM112	Paragraph 8.1.11 of the text refers to Paragraph 190 of the NPPF 2023. This should be altered to Paragraph 196. The rest of the text remains unaltered.	Amendment proposed to MM112 para 8.1.7 to update reference to correct NPPPF paragraph now 196
15		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.22	MM112	Paragraph 8.1.22, referring to how historic view lines across the lake can be improved states under part b) 'Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people.'  Greater flexibility is suggested in how development proposals could respond to these matters. Our suggested wording is therefore: <b>Either</b> improving the appearance of building(s), <b>redeveloping the building(s) or removing buildings and</b> co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people <b>(if relevant).</b>	No change proposed. It is considered that "improving the appearance of buildings" can either be done through redevelopment or more minor alterations, depending on the building
16		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.23	MM112	Paragraph 8.1.23 references the creation of new views. This also relates to part j) within the main policy text (commented earlier in this submission). The 2022 draft Local Plan only referenced historic views and therefore this new view reference is understood to be a change from previous submissions. Our client recognises this opportunity and considers it a positive addition in principle.  However, these new views are not defined in any existing public document (with relevant public scrutiny required of new guidance such as this), as opposed to historic views which feature in the conservation area guidance. Given the proposed landscape management plan will set a new direction for the whole park we suggest that these new views are identified within this landscape management plan. Reiteration of the historic views in the landscape management plan would create a clear single point of reference to assist the decision maker, interested party and public (supported by paragraph 16 d) of the NPPF). Subsequently, we suggest a part e) to the supporting text under this paragraph, namely: <b>e) Identifying in the new landscape management plan the existing historic views, and where there are opportunities to establish new views. The plan will provide guidance for the enhancement of the historic views and criteria for supporting the new views.</b>	No change proposed
17		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	This representation focusses on the new Policy N8.1 (Wimbledon Park) and the modified Site Allocation W13 (All England Lawn Tennis Club). We append the original and the modified wording to this statement for reference. We consider the area which the policy covers should be named 'Wimbledon Park: Registered Park and Garden – Policy N8.1'. 'Wimbledon Park' can have different meanings depending on an individual's perspective. The day-to-day experience of Wimbledon Park for the general public will most likely mean the land owned by the London Borough of Merton, rather than The Wimbledon Club's or the former Wimbledon Park Golf Club where there is no general public	No change proposed. The Policies Map and the map extracted within the policy on page 274 show where the policy applies. Paragraphs within the policy (e.g. 8.1.1, 8.1.3, 8.1.13-14 etc) explain where the policy applies and the different land ownerships and public accessibility. While it would be very useful to have a policy to designate the whole of the Registered Park and Garden and to be in a position to add this to the policy name, the designated Registered Park and Garden covers some land within the London Borough of Wandsworth where this policy doesn't apply.
18		3	All England Lawn Tennis Ground Plc	08 Wimbledon Park	N8.1 Wimbledon Park			POLICY TEXT PART J The clause largely reflects the previous W13 Site Allocation wording, however it contains reference to 'new views'. We detail our considerations on this wording under the Supporting Text section of this representation but suggest that in respects of this clause 'where possible' is inserted given establishing these views is likely to be the result of a development proposal and will be part of a range of considerations for the decision maker. Our suggested wording is therefore: 'Respecting the site's historic setting, enhancing historic and <b>where possible</b> , new views to and across the lake, and to St Mary's Church, and supporting greater public access to these views.'	No change proposed. Decision-makers will balance multiple considerations in coming to their decision on planning applications.
19		3	All England Lawn Tennis Ground Plc	09 Wimbledon	W13 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	COMMENTARY AND REPRESENTAION ON SITE ALLOCATION W13: ALL ENGLAND LAWN TENNIS CLUB Site Deliverability: The policy states this time period to be between 5-10 years. Whilst this timeframe was relevant specifically for the AELTC's proposals on the former Wimbledon Park Golf Course (now removed from the allocation) it is not applicable for the main site. The AELTC's proposals for this site will be an ongoing series of works and investments and therefore will likely run the full length of the Local Plan period. <u>Site Description, paragraph 3:</u> The 2015 date should be amended to 2016.	Amendment proposed to make the factual change to site deliverability timescale throughout the duration of the Local Plan and site description date changed from 2015-2016.
20		3	All England Lawn Tennis Ground Plc	09 Wimbledon	W13 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	COMMENTARY AND REPRESENTAION ON SITE ALLOCATION W13: ALL ENGLAND LAWN TENNIS CLUB Site <u>Site Description, paragraph 5:</u> We observe that the description of the surrounding area does not identify the tall buildings such as those on Somerset Road which add to the character of the area.	Amendment recommended to site description paragraph 5 to reference the undulating topography and overlooking by taller buildings.
21		3	All England Lawn Tennis Ground Plc	09 Wimbledon	W13 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	COMMENTARY AND REPRESENTAION ON SITE ALLOCATION W13: ALL ENGLAND LAWN TENNIS CLUB Site J213 <u>Site Description, paragraph 6:</u> The updated text includes: In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council. As an appropriate update to the text, we suggest an additional sentence stating: 'The application was resolved for approval at planning committee in October 2023 but has received a mayoral call in from the GLA with a hearing anticipated in 2024.'	Amendment recommended for factual update on text relating to planning application 21/P2900

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22	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	COMMENTARY AND REPRESENTAION ON SITE ALLOCATION W13: ALL ENGLAND LAWN TENNIS CLUB Site <del>Site Description, (former) paragraph 8</del> : The paragraph has been deleted in the updated wording however this paragraph was not exclusively referring to Wimbledon Park. The AELTC need to invest as much in the main site as it does Wimbledon Park, to ensure the club remains at the pinnacle of sport. We suggest that the paragraph is reinstated, but instead states: 'The AELTC is continuing to invest in the upgrade and improvement of their facilities across their estate to support The Championships, in tandem with their proposals at the former Wimbledon Park Golf Club, to improve the buildings, facilities, landscaping, experience and sustainability of the site to retain its position as the premier tennis tournament.' This text is important in identifying the reasons behind the AELTC seeking development via the site allocation at the site.	Amendment to Site description paragraph 8 to refer to ongoing investment throughout the Local Plan period in line with the site allocation
23	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	COMMENTARY AND REPRESENTAION ON SITE ALLOCATION W13: ALL ENGLAND LAWN TENNIS CLUB Site J21501.3.7 Site Allocation: The amended text in the main modifications document states: '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. We view a further piece of text should be deleted, namely 'World class sporting venue of national and international significance with support for continued and long term investment in the site all sites towards this end and to improve community access, particularly to Wimbledon Park Lake.'	Amendment proposed to refer to this site. "All sites" was in reference to site W13 and site RP5.
24	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	<b>Design and accessibility guidance 1b).</b> We suggest that the sentence includes reference to exploring opportunities to invest in, and secure further improvements, in the former Wimbledon Park Golf Course as Per Policy N8.1 so that the site allocation and policy have greater recognition of each other.	No change proposed. Part 1 already refers to securing benefits to the wider area.
25	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	Design and accessibility guidance (3): The text states: 'Development proposals will need to investigate the potential impact of the proposed development on archaeological heritage.' The revised W13 Site Allocation area no longer falls within the boundaries of the Wimbledon Park House APZ area, with no APZ falling within the revised Site Allocation. Clause 3 should therefore be deleted as it is a remnant of when Wimbledon Park was part of the allocation.	Amendment proposed to provide factual correction to remove reference to APZ in "Design and Accessibility Guidance". Reference to the site not being in an archaeological priority area had already been made elsewhere in the site allocation modifications.
26	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	Infrastructure Requirements 3) states: ' <del>Transport for London are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site.</del> A travel plan will also be required to incorporate all the AELTC's landholdings and the Championships, which should support how people access the site in a sustainable way.' This clause is considered out of date, reflecting when the former Wimbledon Park Golf Course was part of the site allocation (hence the deleted reference to the former golf course). Any proposal on the Wimbledon Park site will need to be accompanied by a Travel Plan (as indeed was the case with planning application 21/P2900). Such a development will also be conditioned to require a Travel Plan (again as was the case with the planning conditions contained in the draft Merton decision notice for planning application 21/P2900). Regarding the main site covered by this allocation, the operations of the site are already established and the alterations that have occurred to date have not materially altered the way in which transport to the site occurs. It is therefore inappropriate for a blanket approach to require a travel plan and it should only be an exceptional proposal, (which would generate the need for an appropriate Travel Plan appropriate to the proposal and its context regardless) that this requirement should be sought. This is also already addressed under the Infrastructure Requirements 1) clause. The clause is therefore unnecessary and should therefore be deleted in full.	Amendment proposed to MM115 Site W13 Infrastructure Requirements Point 1 to change "transport assessments" to "sustainable travel and transport assessments".  Amendment proposed to MM115 Site W13 Infrastructure Requirements Point 3 to delete whole paragraph as it is now repeated in Point 1
27	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	Infrastructure Requirements 5) concerns addressing deficiency in access to nature. The AELTC supports this aim but with the knowledge that not all development proposals given their scale may be appropriate for this matter. We therefore suggest the second sentence is modified to: 'The Council will expect proposals <b>where appropriate</b> to address this deficiency in accordance with the Green Infrastructure policies.'	No change proposed. The council uses the Local Plan in proportion to the extent and scale of development for all policies and site allocations.
28	3		All England Lawn Tennis Ground Plc	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Site allocation table under map	MM116	Finally, as described, the yearly overlay is an essential requirement of the AELTC's to meet the operational needs of The Championships. Given the restriction on temporary buildings during The Championships via an Article 4, the policy should acknowledge the central need for such infrastructure as a critical part of the management of the site. We therefore suggest an additional 'Infrastructure Requirement' clause stating: <b>Supporting development proposals for the temporary erection and installation of facilities to support the annual Wimbledon Championships.</b> Our client's particular interests in the new Local Plan particularly pertain to Site Allocation W13 and the new planning policy N8.1 Wimbledon Park. Our client supports the broad principles that these policies are seeking to address. Securing investment into the park, through proposals akin to the WPP project, will in our view be essential to achieving the wide range of interventions identified to address the reasons the RPG is on the heritage at risk register and this approach is supported by the NPPF paragraph 196. We trust that this submission is a helpful consideration to the Council in the preparation of the Local Plan and viewed as a positive enhancement to the proposed wording and supporting text. Should any matter not be clear, or you wish for further clarification, please do not hesitate to contact us.	No change proposed; not necessary for Local Plan soundness.
29	4		Allsop. P	03 Colliers Wood	CW2 Britannia Point land south of			I object to the fact that so many new flats are going to be built in Colliers Wood. We do not have the infrastructure to deal with so many people. How are we going to provide enough GPs, schools, shops, etc.? I oppose the building of these flats.	No change proposed. The council works with infrastructure providers including the NHS, Transport for London and the council's Education department on school place planning to ensure that infrastructure can be pace with the need for more homes. Please see Document LBM16 for Merton's latest infrastructure delivery plan
30	4		Allsop.P	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	I would like to formally submit my objection to any more high rises in Colliers Wood. This would be a serious detriment to the area both visually and in terms of infrastructure. Colliers Wood already has too many unsightly towers and we don't need anymore. There is not the infrastructure such as shops, schools, doctors, dentists etc. to support more flats.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
31	5		Anning.J	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -2036/38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.  As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.  In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.  As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.  These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June 2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/local-plan/newlocalplan/local-plan-submission</a> .

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32	6		<b>Assata. N</b>	General comment - Whole Plan				It's interesting how Borough councils set out their plans, employ whom they want, hence very little changes occur in the employment chain and they bring to the residents many of whom have never heard of the plan but we are spoken to as if we were consulted. You all just do as you please anyway; so just get on with it and don't take people for GOOLS.	No change proposed; no main modifications proposed in this part of the representation.
33	7		<b>Attawar. L</b>	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	I am writing as a local and resident of Colliers Wood to strongly object to the Planning Inspector's recommendation to remove the clause that Britannia Point should remain the pinnacle in Colliers Wood. I have lived in Colliers Wood for over 40 years and in that time have seen the intense house building that has gone on in Colliers Wood and this also includes the recladding and increased flats in Britannia. But what hasn't kept pace with this increased development is the infrastructure needed to support the additional families coming in to occupy these homes. While this may not be a planning consideration it is one that should be considered and is something I am very concerned about. Colliers Wood is a unique and special place with a beautiful mix of housing and low rise blocks and a place with a rich heritage – something enjoyed by the residents of Colliers Wood who value and love the vibrant community that it has. The 19-storey block that is Britannia Point is out of keeping with housing style and mix of low-rise buildings around it. The wind tunnel it creates between the building and tube station can be dangerous and there have been instances when people have fallen because of the strong winds. Therefore, to have more tall blocks around it will only add to this problem. Further tall blocks will only block out the sunlight of residents' gardens creating shadows stretching far and wide affecting Singlegate Primary School at the back and over the Wandie Park. The site is on a flood risk plane and with climate change an emergency it is important that the Local Plan needs to demonstrate that guidance in the document ensures responsible development and protections not only for those who will live in the blocks but also for those residents living in close proximity to it. In my opinion the Planning Inspector' duty is not about building more houses in the area but has a responsibility to ensure that the right sort of development takes place encouraging responsible developers to build in Colliers Wood. I therefore I please urge you to reconsider leaving the clause in the Local Plan that Britannia Point should be the pinnacle in Colliers Wood.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
34	8		<b>Barocas.M</b>	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		We are a small developer in South West London and operate a fair bit in and around the borough of Merton.  We would like to put forward the following objection:  Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.  As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.  In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.  As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.  These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/property prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if i	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
35	9		<b>Battles Area Residents Association (BARA)</b>	10 Health and Wellbeing			MM198	We believe the changes have provided greater clarity to several key policies in the plan and in particular, we are pleased to see the greater emphasis now placed on the need for new development to respect local character and context and to promote community health and wellbeing (MM10, MM128 and MM198).	Support welcomed
36	9		<b>Battles Area Residents Association (BARA)</b>	01c Urban Development vision and objectives			MM10	We believe the changes have provided greater clarity to several key policies in the plan and in particular, we are pleased to see the greater emphasis now placed on the need for new development to respect local character and context and to promote community health and wellbeing (MM10, MM128 and MM198).	Support welcomed
37	9		<b>Battles Area Residents Association (BARA)</b>	03 Colliers Wood	N3.1 Colliers Wood		MM38	We also welcome the greater weight attached to the Merton Infrastructure Delivery Plan and the clear statement that development proposals must ensure that infrastructure requirements are met (MM38)	Support welcomed
38	9		<b>Battles Area Residents Association (BARA)</b>	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	By exception I would request two changes: MM33 3.1.18, MM39 and MM44 I would ask you to reinstate the phrase "Britannia Point 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" which can be found at paragraphs 3.1.18 (reference MM33), and twice in Site Allocation CW2 Land South of Britannia Point (references MM39 and MM44). Such reinstatement was supported the Council's Development and Planning Applications Committee.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
39	9		<b>Battles Area Residents Association (BARA)</b>	07 South Wimbledon	N7.1 South Wimbledon		MM255	With respect to the Main Modifications which relate specifically to South Wimbledon, we would comment as follows: 1. We are pleased to see Policy N7.1 has been amended to strengthen references to the need for new development to respect heritage assets and now include reference to the importance of protecting and enhancing Haydons Road Recreation Ground and the need to ensure the development of the High Path Estate is integrated with the wider area to ensure that development enhances the local environment (MM255). However, in order to reflect the changes to policy N7.1, we believe the boundary of South Wimbledon should also be amended to include the whole of Haydons Road Recreation Ground.	No change proposed. Analysis, consultation and engagement carried out for both Merton's Borough Character Study (doc ref 12D1 <a href="https://www.merton.gov.uk/system/files/file=20037_final20merton20character20study_high20res_210728.pdf">https://www.merton.gov.uk/system/files/file=20037_final20merton20character20study_high20res_210728.pdf</a> ) demonstrates that Haydon's Road Rec is popular and identified by different residents and community groups as being part of three neighbourhoods: South Wimbledon, Wimbledon and Colliers Wood. Rather than place the whole of Haydon's Road Rec into any one of these neighbourhoods, the Local Plan attributes part of the Rec to each neighbourhood to reflect its location, characteristics and importance to each community.
40	9		<b>Battles Area Residents Association (BARA)</b>	07 South Wimbledon	N7.1 South Wimbledon	Part G		The amendments to Policy N7.1g relating to the redevelopment of South Wimbledon Station are welcomed. However, we are of the view that the wording of the site allocation (Ref: W8) should be further amended to reflect the changes to Policy N7.1. The redevelopment of this important site needs to be very carefully handled given site constraints. We believe a masterplan is required to show how it would integrate with the Local Centre and High Path Estate Regeneration Area and that the site allocation should be amended to reflect this. The future of this site is key to the regeneration of South Wimbledon and 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 also be fully engaged from the outset in shaping proposals and this should be referenced in the site allocation.	No change proposed. Site W8 states that it is proposed for long-term delivery (10-15 years) Agree that the local community should be fully engaged at the outset in shaping proposals and this approach is expected for all site allocations or significant sites.
41	9		<b>Battles Area Residents Association (BARA)</b>	07 South Wimbledon	N7.1 South Wimbledon	7.1.6		We welcome the amendments to para 7.1.6 in the supporting text to Policy N7.1 and the changes to the policies map designations which now show the new Local Centre boundary, the site allocation W8 South Wimbledon Station and the High Path estate regeneration boundary on a single plan. This makes clear the importance of an integrated approach to development in South Wimbledon. However, since site allocation W8 has been moved to Chapter 07 South Wimbledon, para 7.1.6 should be amended as it refers incorrectly to the site allocation being in Chapter 09 Wimbledon.	Amendment proposed to paragraph 7.1.6 to refer to Site allocation W8 being part of Chapter 7: South Wimbledon (and not chapter 9: Wimbledon)

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42	9		Battles Area Residents Association (BARA)	07 South Wimbledon	N7.1 South Wimbledon	261		We note that the objectives for South Wimbledon (p 261) have not been amended to reflect the Main Modifications. Given the changes now proposed, we believe that it would be appropriate to add an additional/fourth objective which reflects these <b>Enhancing local character and heritage: Promote new development which respects and enhances local character and opportunities to celebrate the area's unique local heritage.</b>	No change proposed. Evidence to support the Local Plan including Merton's borough character study (12D1 <a href="https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf">https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf</a> ) and Merton's Estates Local Plan (High Path only) (ref <a href="https://www.merton.gov.uk/system/files?file=appendixbestatelocalplan.pdf">https://www.merton.gov.uk/system/files?file=appendixbestatelocalplan.pdf</a> ) demonstrates that the local character at South Wimbledon is very varied, from Victorian buildings to Edwardian terraces to 1960s-1980s apartment buildings. Merton's Borough Character Study supports south Wimbledon as having potential for re-imagining character in places: "more fundamental intervention through the redevelopment of larger sites or centres to be bolder about the level of change, using the prevailing character from surrounding areas to influence re-design" which has a similar rationale for the regeneration of the High Path estate.
43	9		Battles Area Residents Association (BARA)	09 Wimbledon	W12 (and W15, W16, W19, W10, W11, W13, W15, W16)		MM113	We also welcome the greater weight attached to the Merton Infrastructure Delivery Plan and the clear statement that development proposals must ensure that infrastructure requirements are met (MM38) and the clarity that all building heights in Wimbledon Town Centre will be subject to their impact on the existing character, townscape and heritage (MM113).	Support welcomed.
44	9		Battles Area Residents Association (BARA)	09 Wimbledon	W11 Battle Close			Site W11 Battle Close, North Road, Wimbledon SW19 1AQ It is noted that the indicative site capacity for site allocation W11 has been increased from 50-75 to 70-103 residential units in the full version of the Local Plan incorporating the main modifications but we could find no details of the proposed changes in the Schedule of Main Modifications or the Schedule of Additional Modifications. It is therefore unclear what the justification for this change is and whether the impacts of the proposed changes been assessed including the impact on local character and amenity and infrastructure capacity. We are concerned about the potential impact on the local area of increasing the indicative capacity of this site for housing development by what amounts to almost 50% and the implications for development mix. Unlike all other site allocations, no details are provided in the table in the current draft under site allocation. In the previous draft this was given as: 'Any of the following uses or a suitable mix of community (including education), sport/leisure facilities and residential'. We have previously voiced our concerns that the site allocation could allow for a purely residential development without any community uses and our concerns have been compounded by the modifications now proposed. 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 a council owned site, the Council has the opportunity to promote an exemplar scheme which promotes health and wellbeing and other policy objectives which have been further strengthened as a result of the Main Modifications. Without further justification for the proposed changes, we would object to the proposed amendments to site allocation W11. We also believe the site allocation for W11 should clearly state 'A suitable mix of community (including education), sport/leisure facilities and residential' as in previous drafts.	No change proposed. Further site assessment was carried out for all sites to ensure that the Local Plan can meet its share of London's new homes and comply with national policy. The council's Infrastructure Delivery Plan was revised alongside this in 2022 (see LBM 16 <a href="https://www.merton.gov.uk/system/files/lbm16_-_merton_infrastructure_delivery_plan_-_september_2022.pdf">https://www.merton.gov.uk/system/files/lbm16_-_merton_infrastructure_delivery_plan_-_september_2022.pdf</a> ) to consider that there is the necessary infrastructure, including sports, leisure, healthcare and community uses. This assessment did not require Battle Close to be allocated for a mix of uses
45	9		Battles Area Residents Association (BARA)	10 Health and Wellbeing			MM128	We believe the changes have provided greater clarity to several key policies in the plan and in particular, we are pleased to see the greater emphasis now placed on the need for new development to respect local character and context and to promote community health and wellbeing (MM10, MM128 and MM198).	Support welcomed.
46	9		Battles Area Residents Association (BARA)	12 Places and Spaces	D12.1 Delivering well designed and resilient neighbourhoods		MM199	The emphasis placed in the Main Modifications on design quality and the preparation of Design Guides and Codes is also welcomed (MM199).	Support welcomed.
47	9		Battles Area Residents Association (BARA)	12 Places and Spaces	D12.2 urban design	, new criteria below part v	MM209	Furthermore, we are pleased to see our concerns about the management and maintenance of the public realm specifically addressed in the Main Modifications (MM209). The revised and amplified policies on Climate Change are also supported	Support welcomed.
48	9		Battles Area Residents Association (BARA)	14 Infrastructure	IN14.2 Social and community infrastructure		MM38	Policy IN14.2 Social and Community Infrastructure Whilst the Main Modifications (MM38) include the requirement for development proposals to ensure infrastructure requirements are met, we believe Policy IN14.2 should also be amended to reflect this commitment. Necessary infrastructure should 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).	No change proposed. Policy IN14.1 already requires this, for example in part A "Expect new development to identify, plan for and provide any necessary linfrastructure and require that, where necessary, linfrastructure should be completed prior to occupation."
49	10		Belvedere Estate RA	General comment - Whole Plan				The Committee of the Belvedere Estate RA which covers 26 roads in and around Wimbledon Village, have taken a keen interest in the Main Modifications and have had input to the submissions from The Wimbledon Society and the Wimbledon Park RA and we fully endorse both of those documents which are attached hereto for easy reference. BERA covers roads in Hillside and Village Wards and the relevant Councillors are also copied above along with the authors of the submissions and the BERA Committee. You may also receive submissions from individual BERA members.	No change proposed; none proposed in this
50	11		Bhatt R	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	I am writing to object to the proposed removal of rules that limit buildings taller than 19 storeys being be built in Colliers Wood. This objection is for a number of reasons, including the following:  Buildings over such height would be completely out of character with the area, and would therefore have a negative impact on the existing character of the area. There is only one other tall building in the area, which itself was built in the 1950s, and would not be approved today. The building towers over the rest of the neighbourhood and has, amongst other things, had safety issues such as glass falling onto pedestrian areas; Building over such height would have negative effects on the neighbourhood and community including, but not limited to, loss of daylight and loss of privacy. For the reasons above, the existing rules limiting buildings to no taller than 19 storeys are appropriate and should be retained. Whilst increasing housing is an understandable and laudable goal, doing so by proposing to build tall towers that are completely at odds with the nature of an existing area is not the appropriate way of doing this.  I would also note that the proposal has drawn serious concern with existing residents, who in my experience are overwhelmingly against the proposal. Indeed, please see details of an online petition objecting to this proposal, which has nearly 1,000 signatures: <a href="https://www.change.org/p/reject-the-construction-of-taller-buildings-in-colliers-wood">https://www.change.org/p/reject-the-construction-of-taller-buildings-in-colliers-wood</a> .  I trust that you will reconsider the proposal to remove the existing building restrictions.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
51	12		Blümel. S	04 Mitcham	M16 Mitcham Gasworks		MM62	I am writing to each of you to strongly advocate for the rejection of the current planning proposal MM62, citing the following reasons: Firstly, there has been no presentation of new evidence that justifies the increase in the number of dwellings. Secondly, it is imperative that any modification aligns with the aspirations of the local community. The current proposal, which includes 500-650 dwellings and 10-story buildings, has been met with numerous opposition from residents. Moreover, the previous planning application has garnered numerous objections from local residents, including a petition signed by more than 660 individuals, as well as a door-to-door survey conducted in close proximity to the site. In light of these concerns, I urge you to reject the proposed modifications to building height and density, and instead, revert the site allocation to its original indicative plan	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
52	13		Broxup. I	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	There can be no justification for building a super tall tower (over 19 storeys) high. It would be completely out of character with the area which is almost completely low rise. The whole area and feel for neighbourhood would be spoilt. The local school - singlegate primary will be completely overlooked by the building which will have as adverse on the children's education and ability to enjoy their playtime. The area already has a shortage of facilities. This will make the problem much worse	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.

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53	14		Bryan. A	03 Colliers Wood	CW2 Britannia Point land south of	3.1.18 POINT 3	MM33 MM39 ,MM44	<p>I am writing to submit a written objection to the suggested removal of a clause (3.1.18, and point 3 in 'Design and accessibility guidance' section of the discussion of the CW2 site) in the Merton Local plan by the Planning Inspectorate. The removal of this clause, which would prevent the construction in Colliers Wood of any building taller than the 19 storey Britannia Point, is not required to increase housing stock at the required rate, and the construction of such buildings would have a significant negative impact on the area. As a resident of Colliers Wood, I ask you to ensure that this clause remains in the Plan.</p> <p>As a private renter who would like to be able to buy a property in Colliers Wood in the future, I recognise the need to build more houses in the local area. The removal of the Clause noted above would leave open the possibility that this aim might be achieved through the construction of another very tall tower block in the area, dwarfing even Britannia Point. In my view, it is important to explicitly rule such an option out in the Local Plan. Britannia Point is 19 storeys tall, and far, far taller than any of the surrounding buildings or other major blocks in the area. It would still be possible within the terms of the Clause to build tall residential blocks, if necessary. It is therefore puzzling why the Planning Inspectorate would wish to keep the option of building an even taller block on the table. Any block of this size would have an enormous impact on the character of the area, and would likely exacerbate some of the issues which have been caused by the Britannia Point developed in the first place (including regarding wind tunnels in the surrounding area), especially if built on the CW2 Site discussed in the Plan.</p> <p>The recent structural issues with Britannia Point should also be a wake-up call about developing housing plans which give too much weight to the aims of developers, rather than the long-term character of the area and the preferences of residents. There is no need or justification for a 20+ storey block on the CW2 site. In my view, smaller developments on this site would be very welcome, especially if mixed with non-residential. Such a development might improve the ambience of the area immediately by the underground station. Any tower higher than Britannia Point would undermine these aims. As such, I ask you to retain the relevant Clauses within the Local Plan.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
54	15		Burder. S	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>I learned today that the Merton planning inspector wants to remove limits on the height buildings can be constructed in the borough. No doubt this is to facilitate construction of further tower blocks in the vicinity of Britannia Point at Colliers Wood. If allowed, this proposal would lead to buildings even higher than Britannia Point, itself already a problematic building. I write to add my objection to this proposal in the strongest possible terms. The planning department will know perfectly well why I and many other residents of the area object - inappropriate development for the area, light issues, air flow around and between buildings, over crowding of people in relation to available infrastructure (schools, transport, doctors, dentists, etc). I am appalled at this proposal.</p> <p>From my own observation of how the council operates, having attended remotely the charade of a democratic process of a planning committee meeting in the past, where there was no proper debate and the Labour majority unanimously approved the planning officer's recommendation to allow the development of a similarly excessive office building at St George's House in central Wimbledon, I have no confidence that the council will listen to residents and act in their best interests. Rather, it seems the reasoning and process of these decisions is kept as opaque as possible, perhaps deliberately to limit the amount of public opposition that could arise if people really knew what was going on. For example, I myself have only just heard about this proposal with a deadline for objecting to it of tomorrow. I hope you will listen this time.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
55	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	5.1.11		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>The SDF will inform the procurement of a development partner(s) <b>which might be necessary to who will</b> help deliver the regeneration within the Morden Regeneration Zone.</p>	No Change Proposed. The proposed changes are new and do not appear to relate to any modifications proposed as part of the consultation (in LBM29, 30 or 36), and they are not necessary to make the draft local plan 'sound'.
56	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	5.1.11		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>"Development proposals for large sites (0.25 hectares and above) that come forward which can contribute to the delivery of comprehensive regeneration, as stated in Policy N5.1 a, should have regard to the vision, objectives and principles set out in the SDF, <b>as well as recognising the need to bring forward as a priority sustainable, large previously developed sites, which can significantly contribute to the provision new housing in order to meet the Borough's housing needs during the plan period.</b>"</p>	No Change Proposed. These modifications were proposed as part of the council's response to Matter 15, Issue (i), Question 1 from the Planning Inspectors, before the public hearings in June 2022. Matters regarding the Morden Regeneration Zone, were discussed at the Planning Inspectors' public hearings in June 2022 and in September 2022. The proposed wording does not improve clarity and is not necessary to make the draft local plan 'sound'.
57	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	5.1.18 / p.187		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>... "There are also a multiple other land ownership interests within the Morden Regeneration Zone and landowners are strongly encouraged to work together. <b>Land assembly of smaller sites within Morden Regeneration</b> will be required to ensure that the comprehensive regeneration of Site allocation Mo1 can be achieved by the end of the local plan period and avoid fragmented development and sub optimal 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 and in accordance with London Plan policies H1 and H2, references to large sites in this policy refer to sites of 0.25 hectares and above"</p>	No Change Proposed. The modifications to paragraph 5.1.18 were proposed as part of the council's response to Matter 15, Issue (i), Questions 1 and 4 from the Planning Inspectors, before the public hearings in June 2022. Matters regarding the Morden Regeneration Zone, were discussed at the Planning Inspectors' public hearings in June 2022 and in September 2022. The details of the land assembly required are unknown at the stage. The proposed wording is not necessary to make the draft local plan 'sound' and may potentially hinder the delivery of the regeneration aims within draft policy N5.1.
58	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	5.1.33 / p.190		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>... Tall Buildings that meet the requirements in policy D12.6 are considered appropriate as part of the regeneration to deliver optimised residential development on the highly accessible land within the Morden Regeneration Zone. In appropriate locations <b>-such as those shown in the Strategic Heights Diagram, Morden Regeneration Zone</b>, tall buildings can assist with the reimagining the Town Centre and the creation of new character areas and features, creating gateway to the Town Centre and landmarks in key locations that add character and legibility.</p>	No Change Proposed. The council proposed their modifications to the subject sentence in November 2021, when the draft local plan was submitted for examination in public. Matters regarding the Morden Regeneration Zone, were discussed at the Planning Inspectors' public hearings in June 2022 and in September 2022. The proposed wording does not improve clarity and is not necessary to make the draft local plan 'sound'.
59	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	5.1.34 / p.190		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>... The Strategic Heights Diagram for the Morden Regeneration Zone indicatively illustrates a composition of appropriate building heights that locate the tallest buildings on and around Morden underground station. To avoid inappropriate abrupt transitions of building heights, the redevelopment of sites immediately adjacent to the tall boundary and indicative clusters identified in the Strategic Height Diagram should be supported by either <b>National or</b> a local Design Code or Design Code as set out in Policy D12.6 "Tall buildings." 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"</p>	No Change Proposed. Site allocation Mo1 Morden Regeneration Zone, as propose to be modified(MM86) in response to the Inspectors' post hearings letter, states that the design guide or code should "...reflect local aspirations..." and that the National Design Guide and the National Model Design Code should only be used in the absence of a local design guide or code.
60	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	5.1.62 / p.196		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>... There are large sites that could come forward with development proposals during the lifetime of this Local Plan that <b>on their own</b> can help to achieve the comprehensive regeneration of Site Mo1. Unlike smaller sites, large sites (of 0.25 hectares or more) are of a size that can optimise capacity for Town Centre Type uses, new homes and support improvements to the public realm and local infrastructure in line with the requirements of this policy.</p>	No Change Proposed. These modifications were proposed as part of the council's response to Matter 15, Issue (i), Question 1 from the Planning Inspectors, before the public hearings in June 2022. Matters regarding the Morden Regeneration Zone, were discussed at the Planning Inspectors' public hearings in June 2022 and in September 2022. The proposed wording does not improve clarity and is not necessary to make the draft local plan 'sound'.
61	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	p.209		<p>Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below:</p> <p>... In accordance with the Strategic Heights Diagram for the Morden Regeneration Zone and Policy D12.6 "Tall Buildings" tall buildings would be acceptable in this town centre site to ensure the best use of land that benefits from excellent public transport accessibility. Tall buildings must however relate well to the surrounding context and public realm, particularly at street level and must be informed by <b>National or</b> Design or Design Code to demonstrate the appropriate stepping up of heights above or below those stated to avoid abrupt transitions in building heights."</p>	No Change Proposed. Site allocation Mo1 Morden Regeneration Zone, as propose to be modified(MM86) in response to the Inspectors' post hearings letter, states that the design guide or code should "...reflect local aspirations..." and that the National Design Guide and the National Model Design Code should only be used in the absence of a local design guide or code.

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62	16		CBRE Investment Management (CBRE IM)	05 Morden	N5.1 Morden	p.201		Sought amendments highlighted in <b>red bold italics or crossed-out red bold text</b> as below: ... The Merton Character Study 2021 and other supporting design evidence has informed the range of appropriate heights set out in Policy D12.6 "tall Buildings" and the Strategic Heights Diagram for the Morden Regeneration Zone. However, appropriate design-led height parameters for this site should be informed by either a <b>National or</b> a locally prepared Design Guide or Design Code which could be prepared either by applicants or the Council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance in the National Design Guide and the National Model Design Code. In the absence of Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications.	No Change Proposed. Site allocation Mo1 Morden Regeneration Zone, as propose to be modified(MM86) in response to the Inspectors' post hearings letter, states that the design guide or code should "...reflect local aspirations..." and that the National Design Guide and the National Model Design Code should only be used in the absence of a local design guide or code.
63	18		Clarke K	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	Another point to add. I see that there is a petition organised by Cllr Neaversons against the inspector's recommendations on Colliers Wood. This contains the wholly inaccurate statement that "Merton has a track record of meeting or exceeding its housing targets in recent years". This is somewhat surprising to hear from a substitute member of the development and planning applications committee. The site in question has a very high PTAL score and is adjacent to a Northern Line station. It is located within an Opportunity Area as defined in the London Plan and has an existing tall building. If Merton councillors oppose the delivery of high density housing I don't think their will be any hope of meeting land supply targets in upcoming years. Naturally, I will not be signing the Councillor's petition.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
64	18		Clarke K	03 Colliers Wood	CW2 Britannia Point land south of			Another point to add. I see that there is a petition organised by Cllr Neaversons against the inspector's recommendations on Colliers Wood. This contains the wholly inaccurate statement that "Merton has a track record of meeting or exceeding its housing targets in recent years". This is somewhat surprising to hear from a substitute member of the development and planning applications committee. The site in question has a very high PTAL score and is adjacent to a Northern Line station. It is located within an Opportunity Area as defined in the London Plan and has an existing tall building. If Merton councillors oppose the delivery of high density housing I don't think their will be any hope of meeting land supply targets in upcoming years. Naturally, I will not be signing the Councillor's petition.	No change proposed, none proposed as part of this representation.
65	18		Clarke K	04 Mitcham	M16 Mitcham Gasworks			It's my firmly held belief that all these plans and policies are waste of time. Taking the example of the Wimbledon Chase Station (22/P1819) application there was a list of reasons why the Planning Committee should ignore council policy in order to secure the units of "much needed housing". The chair even threw in an extra departure of his own with the suggestion that the standard permit free parking condition should be redefined. In contrast the council seems to be rather dragging its heels on a far larger development of "much needed housing" at Mitcham Gasworks (22/P3620) where a number of local Merton councillors in the majority grouping have expressed opposition to the plans. The whole thing seems rather contradictory and even hypocritical.	No change proposed; the representation relates to a planning application.
66	19		Cllr Andrew Judge Councillor Tenants' Champion LB Merton Cabinet Member for Housing and Sustainable Development	03 Colliers Wood	CW2 Britannia Point land south of	3.1.18	MM33 MM39 ,MM44	By exception I would request two changes: MM33 3.1.18, MM39 and MM44 I would ask you to reinstate the phrase "Britannia Point 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" which can be found at paragraphs 3.1.18 (reference MM33), and twice in Site Allocation CW2 Land South of Britannia Point (references MM39 and MM44). Such reinstatement was supported the Council's Development and Planning Applications Committee.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
67	20		Cllr Mercer	05 Morden	Mo1 Morden Regeneration Zone			I would like to object on behalf of the residents of Merton Park to the proposed Local Plan insofar as it relates to the potential height of development in the centre of Morden. The Local Plan has been under consideration for years and throughout that time the councillors for Merton Park have argued against permitting buildings excessive height. The Civic Centre itself is a complete outlier in this area with 14 floors whilst the next tallest building in the centre is the underground station with just 4 floors. The character of the area is not defined by the Civic Centre but by all the other buildings in the area, ie 2 or maximum 3 storey buildings which are largely residential. The aspiration to improve and develop Morden town centre is widely supported and a source of optimism in the vicinity and in wider Merton. The desire to build accommodation to relieve some of the intense surplus of demand over supply is understandable and can be accommodated. However, this does not justify development which is completely alien to the existing Character, Heritage or Townscape of the surrounding neighbourhood. A development from 2 to 6 storeys self-evidently represents a considerable intensification and encroachment from the perspective of an adjacent 2 story building. The Plan anticipates a cluster of buildings at the core which might extend from 13-22 storeys. The Plan acknowledges the need for tapering of building heights across the town centre but, if these sort of heights are permitted, developments of only 6 storeys will be dwarfed by the buildings around them. Such destructive overdevelopment would completely change the character of the area and no high quality design expectations would be likely to produce an overall improvement. The prospect of such an extreme change in the area is a constant fear expressed to me by residents. As part of this consultation the MPWRA is submitting a measured and reasonable response to the Plan. This response should not give you the impression that residents in the vicinity of Morden feel any less passion than is felt by those in Colliers Wood who have argued for the moderation of heights there. If the Plan does not take such concerns into account, the Council can expect considerable opposition to developments for decades to come. In summary I would ask that you a)Amend the Plan to limit the maximum height of any building in Morden to the height of the Civic Centre b)Ignore pressure from the inspectors to accept heights which will inevitably change Morden for the worse I am sure we all want the redevelopment of Morden to result in an exemplar of excellent suburban rejuvenation rather than a disastrous bloated block of high rises with inadequate infrastructure.	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Supported by studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1), earlier versions of the draft local plan have not included references to the Morden Civic Centre building as being a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone. The proposal that the Morden Civic Centre building should be a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone, had been raised in a number of representations, at various consultation stages for the draft local plan. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text for the tall buildings cluster within the Strategic Heights Diagram for the Morden Regeneration Zone, now states that it is an indicative location for a "...tall building cluster where buildings of circa 71m could be appropriate, ..." and paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code.
68	21		Cllr Susie Hicks	09 Wimbledon	N9.1 Wimbledon			I have two primary areas of concern, one is the cumulative effect of many small changes to reduce DPAC's discretion to reject tall buildings in the allocated strategic areas and those immediately adjacent. Hillside is particularly affected because of the cheek by jowl juxtaposition of (non heritage, but pretty and low rise) attractive residential or semi residential streets and squares, and tall buildings. I am also concerned by the weakening of obligations on developers that are there to protect the environment or improve areas deficient in nature (Hillside would be an example).	No change proposed. The London Plan 2021 requires Local Plans in London to identify appropriate building heights. The new Local Plan contains more robust policies to protect the environment than existing policy.
69	23		Colliers Wood Cllrs	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	We are writing to ask you to reinstate the phrase "Britannia Point 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" which can be found at paragraphs 3.1.18 (reference MM33), and twice in Site Allocation CW2 Land South of Britannia Point (references MM39 and MM44). This sentiment is not just shared by the councillors for Colliers Wood, but also over 800 residents who have signed our petition too. We believe that at nineteen stories tall, the current tower is already fundamentally out of keeping with the local character. Visible from as far as Streatham and Sutton, the tower dwarfs over the area and dominates the skyline. An additional tower built adjacent to this would only further erode the low-rise setting and nature of Colliers Wood. Of course, Britannia Point is not going anywhere, nor will plans to develop housing on the plot of land adjacent, known as CW2. Considering the need for homes in London, constructing them on that site is common sense. What however isn't common sense is building something there even taller than the current tower. It's this that has led to hundreds of residents speaking out. We are proud of our community. It's the people who live here and raise their families here that make it what it is. Of course, we do not wish to see the neighbourhood never change at all, but local residents should be able to have reasonable requests listened to, especially when it would create a structure that would tower over the community for decades. We are not saying that nothing should be built there; that site remaining a coach park for the rest of time is in no one's interest. But building something on that site even taller than the already existing tower would only serve to further undermine what makes Colliers Wood special. It will rob homes, as well as our local primary school, of sunlight, and further worsen the already extreme wind impacts felt around the tower by pedestrians and cyclists. We have recently been contacted by a resident who was blown down by the winds at the site. No one should feel scared walking around our town centre because of the presence of a soaring tower that imperils their safety. Another tower would only heighten this risk. Instead, Merton's housing needs should be met through a balanced proposal across the borough that helps to enhance and respect the local character and environment of our communities while contributing to our need for homes. Reinstating the existing Britannia Point as the pinnacle of height for any new buildings is an obvious and unambiguous way to achieve this. We hope you will reconsider your amendment to Merton's Local Plan to ensure that cap building heights at the current Britannia Point remains the pinnacle building height and help to protect our community both now and for decades to come.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.

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70	22		Colliers Wood Residents' Association	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>London Borough of Merton Draft Local Plan: Modifications recommended following the Examination in Public SUBMISSION BY THE COLLIERS WOOD RESIDENTS' ASSOCIATION</p> <p>Background The Colliers Wood Residents Association is the body that represents the views of local residents. The Association is grateful for this opportunity to comment on the proposed modifications to the draft Local Plan arising from the Planning Inspectors Examination in Public.</p> <p>The Association is confining its comments to the proposed amendments to the site brief for CW2, the car park adjacent to Britannia Point – specifically, Major Modifications MM39 and MM 42. The Association is also proposing an additional modification.</p> <p>Summary The views of the Association are easy to summarise: •Future developments on site CW2 should be attractive, appropriate and sustainable. •It is plain for everyone to see that Britannia Point is completely out of place in relation to its surroundings. Taller buildings in the town centre would only serve to exacerbate the abrupt transition from low-rise to high-rise caused by Britannia Point. •Any building taller than Britannia Point would over-intensify land use in the town centre, blight views across a wide area and deprive nearby businesses, hundreds of homes, Wandle Park and our local primary school of natural daylight. •The obvious way to avoid these detriments is to stick with the approach in the current Local Plan, which envisages new buildings stepping down in height from the pinnacle of Britannia Point. •The Association therefore believes vehemently that the height restriction applying to new buildings on site CW2 should be reinstated. Over 700 residents have signed a petition agreeing with this stance. •It will be difficult for residents to believe in the value of the Local Plan if it fails to protect the local community from inappropriately tall buildings that would blight the area for decades. Further arguments to support these views are given below.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
71	22		Colliers Wood Residents' Association	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>Major Modification MM39 This modification removes the stipulation in the current Local Plan that "the existing Britannia Point building should remaining the pinnacle in terms of height". The importance of site CW2 to Colliers Wood</p> <p>Because it falls within an Opportunity Area and has been designated as suitable for tall buildings, CW2 is the most important site in Collier's Wood. The development of the site will affect the amenity of the Town Centre and the quality of life of those who live and work in and around it for decades to come. For this reason it is vital that the new Local Plan encourages development that enhances the character, amenity and environment of the town centre and protects against the blight that would accompany over-intensive development of the site. An explicit limit on the height of any new buildings is an obvious and unambiguous way to safeguard quality of life in the town centre and surrounding neighbourhood.</p> <p>Intensification and over-development CWRA recognises the potential of the site for regeneration and the provision of new housing. However, as the scheme put forward in the current planning application demonstrates, unless the Local Plan provides sufficient protection, site CW2 will be subject to speculative attempts at overdevelopment, to the detriment of residents, businesses, green spaces and our local primary school. We believe that Britannia Point should remain the pinnacle building in the town centre.</p> <p>CWRA notes that the GLA no longer operates a density matrix giving formal guidelines on the maximum housing density permissible on sites across the Capital. Nevertheless, it is self-evident that any residential building that exceeded Britannia Point in height would stretch flexibility on densities well beyond anything that could be considered reasonable. For instance, at 620 units per hectare, the density arising from Criterion Capital's current planning application (which includes a 26-storey tower) would be nearly two and a half times the maximum density envisaged in the previous London Plan.</p> <p>We believe that an effective Local Plan should send a clear signal about the need to avoid over-intensive development and excessive housing densities. A maximum acceptable height lower than that of Britannia Point for any new tall building would help to achieve this.</p> <p>Visual intrusion and loss of natural light</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
72	22		Colliers Wood Residents' Association	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>Colliers Wood is not a dense urban area. Britannia Point excepted, the townscape is predominantly low rise. An additional tower in the town centre that is taller than Britannia Point would stand out like a sore thumb and be visible from every part of Colliers Wood and across South West London. It would blight views from local houses and parks and rob hundreds of rooms in homes, businesses and the local school of daylight and sunlight. Any development of the site should aim as far as possible to preserve the existing daylight and sunlight values of the town centre and surrounding area. A tower higher than Britannia Point would do completely the opposite.</p> <p>Contributing to Merton's housing targets CWRA acknowledges the need for additional housing across the Capital and in Merton in particular. We are aware that the Council needs to meet challenging housing targets over the next 10 years. The Local Plan demonstrates that there are myriad opportunities to develop new housing across the borough, including dozens of brown field sites. Site CW2 can contribute to the achievement of housing targets, but this should not be achieved through the building of an excessively high tower or towers that will have a negative impact on the neighbourhood for many decades.</p> <p>Major Modification MM44 This modification inserts the following text concerning site CW2 "The Merton Character Study 2021 indicates that buildings of around 52m (approximately 15 storeys) may be appropriate on this site. However, appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code which could be prepared either by applicants or the council. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account the guidance contained in the National Design Guide and the National Model Design Code. In the absence of a Design Guide or Design Code the National Design Guide and the National Model Design Code will be used to guide decisions on future applications." [Emphasis added]. CWRA welcomes the idea of a design guide for site CW2 and agrees that this should be based on effective community engagement and reflect local aspirations for the development of the area. However, the final sentence robs the earlier part of its value by suggesting that planning applications could be determined without such a code being in place. The National Design Guide and the National Model Design Code are national documents and can provide little by way of useful guidance on the type of development that is suitable on this specific site.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.



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73	22		Colliers Wood Residents' Association	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39, MM42, MM44	<p>The Association is confining its comments to the proposed amendments to the site brief for CW2, the car park adjacent to Britannia Point – specifically, Major Modifications. The Association is also proposing an additional modification.</p> <p>Summary</p> <p>The views of the Association are easy to summarise:</p> <ul style="list-style-type: none"> <li>•Future developments on site CW2 should be attractive, appropriate and sustainable.</li> <li>•It is plain for everyone to see that Britannia Point is completely out of place in relation to its surroundings. Taller buildings in the town centre would only serve to exacerbate the abrupt transition from low-rise to high-rise caused by Britannia Point.</li> <li>•Any building taller than Britannia Point would over-intensify land use in the town centre, blight views across a wide area and deprive nearby businesses, hundreds of homes, Wandle Park and our local primary school of natural daylight.</li> <li>•The obvious way to avoid these detriments is to stick with the approach in the current Local Plan, which envisages new buildings stepping down in height from the pinnacle of Britannia Point.</li> <li>•The Association therefore believes vehemently that the height restriction applying to new buildings on site CW2 should be reinstated. Over 700 residents have signed a petition agreeing with this stance.</li> <li>•It will be difficult for residents to believe in the value of the Local Plan if it fails to protect the local community from inappropriately tall buildings that would blight the area for decades.</li> </ul> <p>Further arguments to support these views are given below.</p> <p>Major Modification MM39 This modification removes the stipulation in the current Local Plan that “the existing Britannia Point building should remaining the pinnacle in terms of height”.</p> <p>The importance of site CW2 to Colliers Wood</p> <p>Because it falls within an Opportunity Area and has been designated as suitable for tall buildings, CW2 is the most important site in Collier’s Wood. The development of the site will affect the amenity of the Town Centre and the quality of life of those who live and work in and around it for decades to come. For this reason it is vital that the new Local Plan encourages development that enhances the character, amenity and environment of the town centre and protects against the blight that would accompany over-intensive development of the site. An explicit limit on the height of any new buildings is an obvious and unambiguous way to safeguard quality of life in the town centre and surrounding neighbourhood.</p> <p>Intensification and over-development CW2 recognises the potential of the site for regeneration and the provision of new housing. However, as the scheme set forward in the current planning</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
74	22		Colliers Wood Residents' Association	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39, MM44	<p>This modification is also inconsistent with paragraph 3 of the design and accessibility guidance for site CW2, which states, clearly and helpfully, that “Local design guides and codes should be prepared for these sites, either by applicants or the council.”</p> <p>The current drafting of MM44 therefore lacks consistency and clarity. This should be rectified by removing the final sentence.</p> <p>Proposed additional MM CWRA notes that the site specifications for many of the other Merton sites considered suitable for tall buildings contains the requirement that: “All building heights will be subject to their impact on existing character, townscape and heritage in accordance with the chapter on Places and Spaces for a Growing Borough.” It is not clear why this wording has been omitted from the site specification for CW2, and CWRA believes that it should be included. ENDS</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
75	26		Criterion Capital Ltd	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39, MM44	<p>These representations follow those made by CC at Stages 1 &amp; 2 of the Local Plan Examination in respect of draft Site Allocation CW2 and the draft Tall Buildings policy. The relevant planning application for the site remains under consideration by the LPA</p> <p>CC supports the proposed modifications to both paragraph 3.1.18, and to point 3 of the ‘Design and accessibility guidance’ in draft Site Allocation CW2, to remove the specification that Britannia Point should remain the pinnacle building in the town centre in terms of height. CC concurs with the Inspectors on the removal of this text on the premise of ensuring soundness, in conformity with the NPPF, specifically with regard to the Proposed Plan being positively prepared, effective and justified. This is explained in detail at paragraphs 25 &amp; 26 of the Inspectors’ Post-Hearings letter dated 30th March 2023, as well as at paragraph 4 of the Post Hearings Clarifications dated 26th April 2023.</p>	No change proposed; introductory paragraph introducing representation
76	26		Criterion Capital Ltd	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39, MM44	<p>CC supports the proposed additional text relating to the approach to tall buildings on site CW2. The text recognises that the ‘appropriate’ building height indicated by the Merton Character Study 2021 is supplanted by the requirement for a site-specific design-led approach, via a design guide/code. This is owing to the shortcomings of the Merton Character Study 2021 which are identified by the Inspectors within paragraphs 14-16 (and to some extent at paragraphs 20-26) of their Post Hearings Letter dated 30th March 2023.</p>	Support noted
77	26		Criterion Capital Ltd	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39, MM44	<p>The continued identification of draft Site Allocation CW2 as an appropriate location for tall buildings, as set out in both writing (at Part 1e of draft Policy 12.6) and via the associated map at p440, is supported by CC</p>	Support noted
78	27		Croydon Almshouses Charities	19 Policies Map	Policies Map - open space			<p>ReForm Architects were asked by Croydon Almshouse Charities to draft a response to the Consultation for main modifications to Merton’s Draft Local Plan (January 2024). We reviewed the following relevant consultation documents published by the Local Authority:</p> <ul style="list-style-type: none"> <li>- LBM31 Merton’s Local Plan (incorporating proposed modifications dated January 2024)</li> <li>- LBM29 (Schedule of Main Modifications dated January 2024)</li> <li>- LBM30 (Schedule of Additional Modifications dated January 2024)</li> <li>- LBM36 (Schedule of Modifications to the Policies Map dated January 2024)</li> </ul> <p>The site behind the Almshouses has been designated Open Space in the new Policies Map (Merton’s Local Plan Section 19): Stage 3 – Green Infrastructure Policies Map 2. Previously, under Merton’s 2014 Merton’s Sites and Policies Plan, the site had not been Open Space and had not been designated. The council’s website includes a history of previous consultation documents. The above change was first suggested in a response to the New Local Plan Consultation Stage 2 by Mitcham Cricket Green Community &amp; Heritage, a civic society for Mitcham Cricket Green Conservation Area and its environs. In their January 2019 response, they proposed to ‘extend Open Space to include the area currently used as allotments behind Mary Tate’s Almshouses’. The change was introduced to the New Local Plan in Consultation Stage 2a (November 2020 –February 2021) on the basis that the site ‘is currently utilized as allotments, offering amenity value through community gardening’. The recommendation for this change was ‘subject to a site visit to confirm the current use’. (Source: Proposed Changes to the Merton Sites and Policies Environmental Maps – Mitcham (Nov 2020). We refer to Site 39.)</p>	No change proposed; no main modifications proposed in this part of the representation.
79	27		Croydon Almshouses Charities	19 Policies Map	Policies Map - open space			<p>We would suggest the following response to the New Local Plan modifications:</p> <ul style="list-style-type: none"> <li>- The site behind Mary Tate Almshouses is not currently being used as allotments and has not been used as such since 2019. The landowner (Croydon Almshouse Charities) has no intention of returning it to allotments.</li> <li>- The addition of the site as Open Space was subject to a site visit by the council to confirm its use. CAC has no recollection or record of this taking place so no change in designation should be made without this.</li> <li>- The site behind the Almshouses is landlocked and offers no public access or visual amenity. The Tate Almshouses Heritage List entry does not mention the allotments or provide a site outline to include the area behind the Almshouses (<a href="https://historicengland.org.uk/listing/the-list/list-entry/1193086?section=official-list-entry">https://historicengland.org.uk/listing/the-list/list-entry/1193086?section=official-list-entry</a>). Since the site is not used as allotments, it does not meet Open Space criteria and should not be designated as such.</li> <li>- It is of note that other sites that had previously been designated Open Space in the 2014 Local Plan have been removed in the New Local Plan because they no longer meet Open Space criteria. (Source: Proposed Changes to the Merton Sites and Policies Environmental Maps – Mitcham (Nov 2020).</li> </ul>	No change proposed. Document 15D1 Merton Green Infrastructure, Biodiversity and Open Space Study 2020 provides evidence supporting the designation of this site as allotments
80	28		Davis K	General comment - Whole Plan				<p>I’d like to have included in the modification document a greater emphasis on the provision of public toilets.</p> <p>Merton has steadily closed all of its public toilets, placing increased reliance on the private sector to meet demand. This has led to some good provision in well to do areas such as Wimbledon, and precious little provision in Mitcham or Morden. The lack of public toilets affects both young and old, people with children and people with disabilities. It really is time for Merton to step up and begin addressing this issue across the borough.</p>	No change proposed. Creation and management of public toilets by the council or another public body can be considered outside the Local Plan but for planning purposes, London Plan Policy S6 Public toilets will suffice.

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81	29		de Montes.M	09 Wimbledon	N9.1 Wimbledon	289, 437,		<p>I am a resident in Wimbledon since 1974 and I would appreciate if you would take into consideration the following concerns. I live in REDACTED, SW19 REDACTED</p> <p>Chapter 9 Wimbledon p.289 The proposed "supporting tall buildings within Wimbledon Town Centre" is not acceptable. For years we, the residents of streets near the Town Centre, have and will continue to fight actively to preserve the character of our area as a residential area. For that to happen, we consider that buildings in the Town Centre should not be higher than 6 storeys. Wimbledon, as you are aware, has an international reputation of a unique character. That is important to preserve. I think this reputation benefits Merton Council.</p> <p>In page 437 The Plan again refers to tall buildings being suitable for parts of the Wimbledon Town Centre. This is not acceptable. The Council should work for the protection of the character/charm of the residential streets' around the Town Centre.</p>	No change proposed. Very detailed character analysis and community consultation has taken place for Wimbledon town centre and is published in the FutureWimbledon supplementary planning document 2020. This considers the existing character plot by plot and the proposed building heights are in keeping with existing buildings in the area. The Local Plan's building heights for Wimbledon are based on this analysis. The Local Plan policy on Wimbledon also recognises that Wimbledon is tightly bound by attractive residential areas. Para 9.1.1 and 9.1.2 state <i>Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only Major Town Centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure....Design quality underpins good growth. 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.</i>
82	29		de Montes.M	09 Wimbledon		543		It is very important to protect the green spaces throughout Wimbledon. To maintain and preserve them developers should not be allowed to build in them.	No change proposed. The Local Plan protects designated open space.
83	30		Denwood. C	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>I can't understand how Merton can have declared a climate emergency and yet voted in favour of the AELTC proposal for expansion into Wimbledon Park. At a time when people are complaining about sewage in rivers and flooding the Council has approved a considerable increase in hard surfaces instead of grass in Wimbledon Park.</p> <p>This proposal for overdevelopment is inspired by 19th century thinking but we are now living in the 21st century. Giving the go-ahead to developments on MOL will provide a precedent for development on other endangered MOL sites.</p> <p>High rise buildings in the town centre will block sunlight from properties with solar panels on their roof, hence obstructing a policy of dealing with climate change. I am sceptical about the demand for these high rise structures and am wondering if the beneficiaries are people or companies who have no local connection or interest. I realise that money talks, though. Property prices fall when good quality houses are overlooked and overshadowed by massive tower blocks. We know someone who has just sold a flat in a neighbouring town centre where the flat was threatened with being overshadowed by oversize towers. Most of Merton Council Tax payers are residents rather than businesses so we should have a voice.</p>	No change proposed. The representation relates to a planning application (21/P2900) which is not for decision as part of this Local Plan.
84	32		Dizer, F	09 Wimbledon			MM116	<p>I have lived at this address with my husband for 38 years and have raised my family here. We have made lots of friends and are close to neighbours who we see regularly and enjoy the area with.</p> <p>I have watched Center Court being built, the Town Hall being moved and many other major changes in the course of this time. The shops used to service local needs as well as attract other people into the center, we had butchers, florists, greengrocers but with the advent of more chains and a surplus of estate agents, drinking, eating venues and a ridiculous number of gyms we feel that this very residential area is not being respected and priority is being given to the business economy. It needs pointing out that we just have one main high street running through the center and all the roads off it are residential with no high buildings in the center.</p> <p>Although there have now been consultations where the wish of local residents has been made clear and no high buildings are wanted it now feels as if the might of developers with the potential of making money comes first. I feel that there is no wish to preserve, protect or enhance our community. This local plan does not raise the standards of planning across the whole Borough and is in danger of changing the character of a unique area for the worse by not considering the diverse population of residents.</p>	No change proposed. Very detailed character analysis and community consultation has taken place for Wimbledon town centre and is published in the FutureWimbledon supplementary planning document 2020. This considers the existing character plot by plot and the proposed building heights are in keeping with existing buildings in the area. The Local Plan's building heights for Wimbledon are based on this analysis. The Local Plan policy on Wimbledon also recognises that Wimbledon is tightly bound by attractive residential areas. Para 9.1.1 and 9.1.2 state <i>Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only Major Town Centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure....Design quality underpins good growth. 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.</i>
85	32		Dizer, F	09 Wimbledon	N9.1 Wimbledon		MM116	<p>Some of the points I think should be considered:</p> <p>There is an increase in homeworking and less need for such vast building proposed to create office space</p> <p>After covid it has become important to value open spaces and the need to address climate change. It would be best to consider the impact on the environment of new buildings as opposed to adjusting existing ones</p> <p>Any developments dependent on Crossrail2 should be removed from the plan as this is now no longer viable given the present climate</p> <p>The Local Plan should assign clearly defined planning and building targets to all developments and redevelopments which could then be strictly monitored and remedied if need be</p> <p>Neighbourhood Planning should be mentioned in the draft Local Plan as it is very important for the residents to have a voice about choices which affect them</p> <p>It is a priority to conserve local character and to pay attention to create a space visitors wish to come to. 'Greening' the town centre would certainly be in keeping with the residential feel. Attention should be paid to the local attractions such as Wimbledon Theatre and other spaces would enhance the experience of residents and visitors</p> <p>How much hotel space do we need? I believe this should be questioned. I also believe this brings traffic and cars to the area as there is no way to force people to use public transport</p> <p>Local people have repeatedly said they wish buildings to be limited in height to 22 m maximum and yet a height of 40 -49 metres is proposed. This would be imposing a density on local people which would completely change the nature of the area. The height should be considered from the point of view of taking daylight and creating a lack of privacy for nearby houses.</p>	No change proposed. Very detailed character analysis and community consultation has taken place for Wimbledon town centre and is published in the FutureWimbledon supplementary planning document 2020. This considers the existing character plot by plot and the proposed building heights are in keeping with existing buildings in the area. The Local Plan's building heights for Wimbledon are based on this analysis. The Local Plan policy on Wimbledon also recognises that Wimbledon is tightly bound by attractive residential areas. Para 9.1.1 and 9.1.2 state <i>Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only Major Town Centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure....Design quality underpins good growth. 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.</i>
86	32		Dizer, F	09 Wimbledon			MM116	<p>The centre should be seen not just a place to generate trips to Wimbledon but to make it a great place for the people who live and work there</p> <p>We had been promised a Concert Hall but have yet to see this happen. This would bring a much needed centre for performing and creative arts and benefit the local economy</p> <p>The tram stop terminus should continue to be located inside the station</p> <p>St Georges car park needs to be made safe as none of the new proposals for hotels seem to include car parks, to simply say they will be car free is silly. What will happen is the cars will spill onto the neighbouring streets with free parking. This already occurs regularly in Compton Road each time the Library Art Space or St Marks has an event.</p>	No change proposed. Policy N9.1 promotes Wimbledon town centre and its surrounds for living, working, arts and culture
87	31		Dizer.C	09 Wimbledon	N9.1 Wimbledon		MM116	<p>Over the years, we have seen the quality of shops in Wimbledon Town Centre deteriorate, causing it lose its balance and character. Whereas once there were such shops as butchers, more chains have moved in such that we now have a surplus of estate agents, drinking and eating places ie a business economy that does not cater for the main local character of the area ie residents.</p>	No change proposed. Government planning policies do not allow councils to differentiate between different town centre type uses.

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88	31		Dizer.C	09 Wimbledon	N9.1 Wimbledon		MM116	The main theme in the Local Plan proposed for our area is to build, and build stupidly high. Who and what does this serve? Are you really suggesting to bring a Croydon with all its problems to Wimbledon? The plans have to be far more clear as to where tall buildings (ie 40 and 49 meters) can be built, especially where they overlap with the proposed 24 meters buildings and border on residential areas. I personally am against any tall building greater than 24 meters in the area as I believe they will change the whole aspect and character of the Town Centre (which, after all, is one road with limited access for deliveries bordered by residential properties).	No change proposed. Very detailed character analysis and community consultation has taken place for Wimbledon town centre and is published in the FutureWimbledon supplementary planning document. This considers the existing character plot by plot and the proposed building heights are in keeping with existing buildings in the area. The Local Plan's building heights for Wimbledon are based on this analysis. The Local Plan policy on Wimbledon also recognises that Wimbledon is tightly bound by attractive residential areas. Para 9.1.1 and 9.1.2 state <i>Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only Major Town Centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure....Design quality underpins good growth. 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.</i>
89	31		Dizer.C	General comment - Whole Plan			MM116	I finally would like to say that I am incredibly disappointed with the Council in that the earlier, more green based local plans where the local residents participated and gave a lot of their time in workshops and where there was some accord are now being replaced with this tall building proposal. I attach a submission from WEHRA from Jan 2021 on the then Local Plan in case this has been lost.	No change proposed. The proposals for Wimbledon town centre including greater greening and building heights reflect the FutureWimbledon supplementary planning document 2020. Detailed site specific public consultation was carried out for the FutureWimbledon document in 2019 and 2020 and the results of this are carried into this Local Plan.
90	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	01b Good Growth	Stage2a November 2020-January 2021 version of Merton's Local Plan		MM116	The pandemic has also cancelled the development of Crossrail2 for several decades at least so this Local Plan will play out before it even comes back as a possibility. This means that the growth targets for greatly increased office space/ evening and night-time economies will not be underpinned by increase in transport capacity and therefore should be scaled back. Any developments dependent on Crossrail2 should be removed from the plan including safeguarding areas which will hold back progress in the town for no substantive reason.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
91	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	01c Urban Development vision and objectives	Stage2a November 2020-January 2021 version of Merton's Local Plan		MM116	Over the plan period, WEHRA believes that addressing climate change is more important than growth. Whilst we support growth this should adhere strictly to an overarching policy addressing climate change. We propose that the urban development objective should be reordered to: 1. Tackling Climate Change – make Merton an exemplary borough in mitigating and adapting to climate change. 2. Place plans and the 20-minute neighbourhood – to promote a high-quality urban and suburban environment in Merton. 3. Supporting Resilience – supporting resilience and recovery, to create the conditions for sustainable growth and direct the benefits of growth. 4. Good Growth – to create the conditions for growth and minimise the impact of development. 5. Places for people – to provide new homes and infrastructure within Merton's town centres and residential areas.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
92	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	07 South Wimbledon	EC13.1 Promoting economic growth and successful high streets.			<b>Policy EC7.1</b> Promoting economic growth and successful high streets: More needs to be done on this policy. Job creation is important, but it must be seen as part of a balance of goals that include tackling climate change and creating an environment where people will enjoy living and working.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
93	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			Wimbledon: Policy N3.6 More needs to be done if Wimbledon is to continue to be a thriving destination for businesses, local residents and visitors. Conserving local character is a priority, as well as 'greening' the town centre – the latest attempt at this outside Wimbledon theatre is woefully inadequate. If this is not addressed Wimbledon Town Centre will increasingly become an 'urban jungle' with tall building canyons which will impinge on the overall safety of residents, businesses and visitors thus making it a much less attractive place and, therefore, less valuable to all.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
94	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>Promoting a vibrant day/night economy</b> is only acceptable to an extent which protects, as a matter of policy, the safety of the streets and the quality of life of the residents nearby and a character in Wimbledon that is attractive to all users.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
95	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>Hotel development:</b> It is debateable whether more hotel space is needed in Wimbledon. If it is, then the requirement is more for upmarket developments	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
96	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>Building height:</b> Proposed building heights of 44 metres are proposed. Local people have repeatedly said they wish <b>buildings to be limited in height to 22m maximum</b> to respect local character and heritage. If buildings are to grow in height then they will need more surrounding open space rather than the much more dense and tall buildings which are currently proposed	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
97	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>Concert Hall:</b> We think there should be a commitment to a new centre for performing and creative arts – the building of which has been promised for years and would now bring a huge new dynamism to the Town Centre.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
98	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>Future location of tram stop:</b> The tram stop terminus should continue to be located inside the station.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>

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99	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Wi2 Broadway car park adjacent New Wimbledon Theatre			<b>Wi 2 Broadway car park, adjoining the theatre:</b> The Council owns this site and could enhance the area and its character by developing the site primarily for community use.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
100	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Wi5 Hartfield Road car park			<b>Wi 5 Hartfield Road Car Park (Council owned):</b> The proposal says development could include taller buildings with a wide variety of uses. As owner, the Council can take the opportunity to create the much-promised centre for the performing and creative arts that would be of great significance to the local area and the whole of London.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
101	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Wi6 Highlands House			<b>Wi 6 Highlands House, 165 The Broadway and Wi 10 Prospect House, St George's Road:</b> Heights should be restricted to a maximum of 22m or 6/7 storeys.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
102	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Wi9 St George's Road			<b>Wi 9 8 St Georges Road (Community Centre site):</b> Council ownership means community interests can and should be prioritised. Here again, building height should be limited to 22m.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
103	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Wi11 Victoria Crescent, 39-59 The Broadway			<b>Wi 11 Victoria Crescent, including Piazza:</b> The Plan should protect the Broadway frontage Conservation Area and the public highway through the piazza. The Piazza should be subject to significant greening and seating areas.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
104	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			The plan should recognise that the aim should be not just to generate trips to Wimbledon, but to make Wimbledon town centre a great place for the people who already live and work there.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
105	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			The omission of any reference to seizing the opportunity to create a music centre for local, London-wide, national and international performers and audiences is to be regretted. Such a project has had significant public support in Wimbledon for many years.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
106	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	09 Wimbledon	Stage2a November 2020-January 2021 version of Merton's Local Plan			There could be more details on flooding and water shortage, subsidence and overheating. In the town centre, the plan's emphasis on retrofitting existing buildings & improving energy performance and on re-using building materials is welcomed, unfortunately it is not well supported by current practice in encouraging big new office blocks in the town centre. There should be significant financial penalties for developers who harm biodiversity	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
107	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	12 Places and Spaces	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>D5.1</b> More detail and rigour are needed to explain 'high quality' and facilitate enforcement. Policy needs to be more positive on enhancing conservation areas and other heritage assets.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
108	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	12 Places and Spaces	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>D5.2</b> The policy needs explicit targets and standards and to emphasise the protection of privacy and daylight/sunlight against potentially intrusive development.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
109	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	12 Places and Spaces	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>D5.5</b> Managing heritage assets. More needs to be done on this policy. The draft plan mentions here again 'Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Studies.' The Local Plan should include a commitment to keep these documents up to date to reflect changes that have taken place since they were originally written, and to write those documents which are still missing.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
110	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	12 Places and Spaces	Stage2a November 2020-January 2021 version of Merton's Local Plan			<b>D5.7.</b> Digital infrastructure. More needs to be done on this policy. The plan should recognise that there are likely to be many places that are particularly sensitive to the impact of telecommunications equipment and these should be all be included in the Plan	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
111	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	13 Economy	Stage2a November 2020-January 2021 version of Merton's Local Plan	Policy TC13.9		TC7.9 Culture, arts and tourism development More needs to be done on this policy. As neither the description nor justification of this policy seem to be accessible online, we cannot agree that this policy supports the provision of cultural, arts and tourism uses.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>

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112	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	15 Green and Blue Infrastructure	Stage2a November 2020-January 2021 version of Merton's Local Plan			Any policies devised should include protecting back and front garden land, a major tree-planting programme and an effective policy for maintaining and protecting trees. In terms of water, restrictions should be introduced on the scale of basement and swimming pool developments given the high water table and local topography, conversely policies also need to be put in place to maintain/improve the already stretched mains water supplies if overall demand rises due to increased development.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
113	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	General comment - Whole Plan	Stage2a November 2020-January 2021 version of Merton's Local Plan			In responding to these proposals, we are very much aware that the Coronavirus pandemic is resulting in radical and fundamental changes in how we live, work, travel, shop and socialise which will continue to evolve for some years to come and will significantly impact the type of developments required to underpin our new future. Historical data is now inadequate to forecast future developments on. LBM needs to fully investigate the implications of the Covid pandemic so it can plan for the post-pandemic town centre. Now is the time to review and challenge the assumptions relating to the commercial development of Wimbledon town centre. For example, given the increase in homeworking, will there be enough demand for the level of office space planned. The successive lockdown restrictions have also placed more emphasis of the type of housing required for these new lifestyles, also the need for open spaces and by far the most important, the need to address climate change.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
114	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	General comment - Whole Plan	Stage2a November 2020-January 2021 version of Merton's Local Plan			Many of the statements/proposals made within the draft Local Plan are not substantiated with defined standards or action plans. We propose that the whole Local Plan should assign clearly defined planning and building targets to all developments and redevelopments which can be strictly monitored and any shortfalls then identified and remedied.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
115	31		Dizer.C response attachment of (Jan 2021) Wimbledon East Hillside Residents' Association (WEHRA)	General comment - Whole Plan	Stage2a November 2020-January 2021 version of Merton's Local Plan			The draft Local Plan does not mention Neighbourhood Planning, a section on this should be added detailing how LBM plans to work with any future Neighbourhood Groups / Fora in the development of Neighbourhood Plans.	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document 0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
116	33		Drummond.A	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, the Inspector stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.  As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.  In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.  As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.  These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
117	34		Edwards. A	02 Climate change	CC2.4 Low carbon energy	2.4.14 page 61	MM29	While the latest modifications include some significant improvements on earlier versions, I would like strongly to support the points made by The Wimbledon Society, the Wimbledon Park Residents Association and Cllor Susie Hicks. I will add some specific points below. Heat pumps etc - MM 29 p 61 New paragraph below 2.4.14 I wish to propose the following slight but significant elaboration (in blue) of the modification proposed by the Council, which is good in itself but not as specific as it needs to be:  Where heat pumps or other similar appliances such as AC units are proposed developers will also need to ensure that living conditions of existing and future occupiers of the proposed development and neighbouring properties are not materially harmed in terms of outlook, noise or vibrations in line with Design Policies D12.3 (g) and D12.4 (g), and Pollution Policy P15.10. Unnecessary visual or noise intrusion on neighbours' houses and gardens should always be avoided or minimised through appropriate location and shielding of pumps and similar machinery and consideration of alternative energy-saving technologies. Protecting the occupiers who benefit from the new energy-saving technologies against such intrusions should never take priority over protecting the neighbours affected.  To ensure that the Plan is effective and consistent with national policy.  [Comment: The somewhat extended guidance proposed would pay handsome dividends in terms of promoting good relations within local communities and reducing the enormous amounts of time wasted by Council and neighbours alike on such cases, especially if accompanied by a new requirement by the Council that developers should inform and consult the neighbours affected and report to the Council on this at the pre-application stage.]	No change proposed. Policy 15.10 <i>Air quality, pollution and land stability</i> includes protection for existing noise-sensitive situations including para 15.10.20 <i>If a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity be designed to protect existing users or residents from noise impacts</i>

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118	34		Edwards. A	09 Wimbledon	N9.1 Wimbledon	241-442		<p>Tall buildings MM pp 241-442 passim The sections now proposed on tall buildings, including the reduced standards to be expected from developers, are troublesome. While enlightened development must be allowed and even encouraged, and it is probably right to define restricted zones where tall buildings above six storeys may be contemplated, the fears reported by Clor Hicks that the centre of Wimbledon, and especially the area North of the Railway, may evolve into a sad, empty, windswept centre of very tall offices, especially if towers of 48m or more are allowed, to the detriment of local residents and businesses, are very real ones. The Wimbledon Society has expressed similar fears about the "Croydonisation" of our town centre, and has emphasised the need for the Council itself, duly advised, to develop an overall indicative plan for what might be allowed, and briefs for development in consultation with local groups, rather than allow the centre to evolve as the end-product of piecemeal approvals for massive new buildings. The Council should not repeat the mistakes which have been made in so many other town centres, including central London and Birmingham as well as Croydon.</p> <p>I believe it would be useful for the Council to include somewhere in these sections a passage along the lines:</p> <p>The Council is concerned not to repeat the mistakes made in too many other towns and cities of allowing the Wimbledon town centre or other main centres in the Borough to evolve into sad, empty, windswept agglomerations of very tall offices and intends to develop its own indicative plan for what new buildings might be allowed and where, in consultation with local groups, rather than allow the centres to evolve as the end-product of piecemeal approvals for massive new buildings.</p> <p>Positive affirmations of policy</p> <p>In a similar spirit, I believe it would be useful for the relevant sections of the Council's Plan to make more positive affirmations or reaffirmations of its general policies in important areas such as these:</p> <p>To strengthen flooding defences, including serious drainage improvements, and to limit the multiplication of basements and swimming pools, especially in areas built on clay</p>	No change proposed. Very detailed character analysis and community consultation has taken place for Wimbledon town centre and is published in the FutureWimbledon supplementary planning document 2020. This considers the existing character plot by plot and the proposed building heights are in keeping with existing buildings in the area. The Local Plan's building heights for Wimbledon are based on this analysis. The Local Plan policy on Wimbledon also recognises that Wimbledon is tightly bound by attractive residential areas. Para 9.1.1 and 9.1.2 state Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only Major Town Centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure....Design quality underpins good growth. 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.
119	35		Element. D	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p><del>To give added priority to protection of the historically important conservation areas, areas of special character and listed buildings within the Reserve</del> I understand that the Planning Inspectorate has proposed removing the clause which states that no building taller than 19 storeys shall be built in Colliers Wood – this despite the numerous objections that have already been made by local residents.</p> <p>I adamantly support maintaining the restriction of the height of new buildings, ideally to well below that of 19 storeys (i.e. in keeping with the remainder of this residential area, not the ghastly monstrosity of a tower block so loathed by the residents), and trust that I will be just one of many sharing this view, as evidenced by the comments to be found in the petitions that have already been submitted – and apparently dismissed or ignored, otherwise this matter would not still be under discussion.</p> <p>I would underline my objections by saying that the existing 'Britannia Point' is already far too tall, that it should never be treated as a 'benchmark' just because a mistaken historical judgement was made (I have qualified this below), and that I vehemently disagree with any permission being granted for the construction of any additional buildings of a similar height in Colliers Wood. Such developments would be (and already are) totally inappropriate, as they are completely out of keeping with a low-rise residential area.</p> <p>There must be many legitimate grounds for refusing planning permission to Criterion, given the chronically deplorable attitude shown by this company towards the local community. Merton Council must be only too well aware of the resistance of local residents against allowing this company to build any new developments in Colliers Wood, and the Merton's councillors should be doing everything in their power to prevent them from doing so as the elected proxies acting on behalf of their voters living in the area.</p> <p>The unsuitability of the site adjacent to 'Britannia Point' for the construction of any additional tall buildings must also raise significant alarm-bells, given these existing issues that are affecting the area surrounding the existing tower block:</p> <ul style="list-style-type: none"> <li>-its proximity to the River Wandle</li> <li>-the fact that the site lies in a flood-plain</li> <li>-the predicted (scientifically modelled) sea level rise associated with anthropogenic climate change that will increase the risk of flooding for properties and land adjacent to the River Wandle between Colliers Wood and the River Thames by 2030</li> <li>-the additional requirements for water-supply and power generation</li> <li>-effluent generation in high quantities in an area where the existing drainage systems already cannot cope with heavy rainfall as the drains will overflow</li> <li>-the soft London clay substrate underneath and associated risk of subsidence</li> <li><del>the proximity to the Northern Line tunnels that prevented the original Lanes/Draws and Post Towers from being demolished by conventional means prior to</del></li> </ul> <p>I live in Colliers Wood and I wish to register my objection to a proposal to permit the construction of buildings higher than 20 Stories in Colliers Wood. This area is predominantly low rise residential housing and should be protected.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
120	36		Elliott. B	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>I live in Colliers Wood and I wish to register my objection to a proposal to permit the construction of buildings higher than 20 Stories in Colliers Wood. This area is predominantly low rise residential housing and should be protected.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
121	37		Environment Agency	01b Good Growth			MM2	We are pleased to note that the wording has been strengthened to state that Merton's future growth must be planned in a sustainable way	Support welcomed
122	37		Environment Agency	03 Colliers Wood	CW5 Priory Retail Park, Colliers Wood		MM52	We support this site allocation specifying that future development should ensure natural processes are restored and enhanced adjacent to the Pickle Brook, with the provision of a 10m buffer zone in line with draft policy O15.3	Support welcomed
123	37		Environment Agency	06 Raynes Park	RP3 Burlington Road		MM93	We support policies to restore the Pyl Brook and provide biodiversity net gain.	Support welcomed.
124	37		Environment Agency	12 Places and Spaces	D12.11 Basements		MM263	We are pleased to see that Policy D12.11 Basements and subterranean design now highlights the requirements of Flood Risk Policy F15.8 in the supporting text.	Support welcomed
125	37		Environment Agency	13 Economy			MM268	We are pleased to see the "Agent of Change" principle, as outlined in the London Plan, incorporated into this section. Paragraph 187 of the NPPF states that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. This includes businesses that operate under permits we issue as part of our role as a regulator.	Support welcomed
126	37		Environment Agency	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	New para below 15.3.21 page 539	MM293	<p>This modification sets out the strategies that applicants should refer to when identifying local habitats of "strategic significance", until London's Local Nature Recovery Strategy (LNRS) is published.</p> <p>In addition to the three strategies mentioned in the proposed wording, we would also recommend that reference is made to our Catchment Planning System, containing recommended mitigation measures for enhancing Water Framework Directive (WFD) water bodies in the catchment. These mitigation measures will be key to informing the future LNRS, with respect to the riverine environment.</p> <p>Please see an excel spreadsheet of recommended mitigation measures attached to this response- we request that this is added as an appendix to the Plan (referenced as "appendix X below").</p> <p>Suggested wording:</p> <p><i>"Until its publication, applicants will have to refer to the details within:</i></p> <ul style="list-style-type: none"> <li>• <i>Merton's Green Infrastructure, Biodiversity and Open Space Study 2020,</i></li> <li>• <i>the relevant SINC citations</i></li> <li>• <i>the management plans of the relevant Local Nature Reserve.</i></li> </ul> <p>• <b>Appendix X, containing recommended mitigation measures for enhancing Water Framework Directive water bodies from The Environment Agency's Catchment Planning System</b></p> <p><i>We feel this addition would ensure this supporting text synergised well with the requirements for enhancing the biodiversity of watercourses outlined in the wording of Policy O15.3. This is also supported by Paragraph 180 of the NPPF which outlines that development should "help improve local environmental conditions, such as air and water quality, taking into account relevant information such as river basin management plans."</i></p>	Amendments proposed. MM293 is proposed to be amended as recommended but with the wording slightly changed, as follows: "• <i>the recommended mitigation measures for enhancing Water Framework Directive water bodies from the Environment Agency's Catchment Planning System, as set out in the Appendices."</i> A new Main Modification is proposed to include the table of recommended mitigation measures as an appendix to the local plan.

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127	37		Environment Agency	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature		MM291	We feel this modification strengthens Policy O15.3 - Biodiversity and Access to Nature, relative to the previous wording, and brings the policy in line with statutory biodiversity net gain requirements	Support welcomed
128	37		Environment Agency	15 Green and Blue Infrastructure			MM298 –	We are pleased that this policy recognises the importance of early engagement with ourselves and other bodies for the Wandle missing link scheme.	Support welcomed
129	37		Environment Agency	16 Sustainable Travel	T16.4 Parking and low emission vehicles	Part g page 571	MM343	We recommend that the modification wording is amended to refer to flooding “from all sources” to bring it in line with the language used in NPPF paragraph 167. Whilst we assume that this modification was made with surface water flooding in mind, car park provision may also impact flooding from fluvial sources. For example, changes to ground levels to car parks within fluvial flood zones may increase flood risk elsewhere by displacing flood flows. Suggested wording: “Development that provides any new provision or an amended layout of on-site car parking provision, should demonstrate that the proposals do not compromise highway safety, pedestrian amenity or increase flood risk from all source	Amendment proposed - “from all sources” added to MM343
130	37		Environment Agency	17 Monitoring Framework	Table 17.1 Monitoring Framework		MM350	Local Plan Monitoring Framework We are pleased to see monitoring targets for zero council approvals subject to objections lodged by us on flood risk, water quality and water pollution grounds.	Support welcomed.
131	38		ErDOS.R	04 Mitcham	Mi16 Mitcham Gasworks		MM62	I've been advised by councillors to submit my comments regarding the proposed changes to the Local Plan to this email address. Please ensure that this email is taken into account as part of your consultation. I'm writing to object to the changes to Mitcham's Local Plan that are due to be discussed by the Planning Committee this week. I'm a Figges Marsh resident (Lavender Fields until the recent ward boundary updates) and live in close proximity to the Gasworks site. The proposal to permit housing developments rising to 10 storeys in Mitcham and to increase the number of units on the Mitcham Gasworks site to 650 (from 200-400) is a shocking diversion from the original plan drawn up by the council with input from the local community. It totally disregards the original research, data and analysis from the council and more worryingly, discounts feedback and engagement from the community who overwhelmingly object to a giant overdevelopment on the site. It's wildly different from the assessment that 200-400 units are suitable for a plot of this size and that tall buildings are unsuitable for development in Mitcham. In your most recent analysis of the Local Plan you mention that 'designs should be based on effective community engagement and reflect local aspirations but such significant changes to the plan are completely at odds with what the community actually wants to see. I'm all for developing the brownfield site for housing but changing the Local Plan in a way to suit the aspirations of a developer in order to boost shareholder profits rather than pushing for a sustainable suburban housing development that enhances the community/surrounding area is extremely disappointing and makes me question why you ask for any feedback/engagement from the local community at all. I urge you to push back on the changes in support of the original plan that the community and council (rather than a developer) was in favour of.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
132	39		Ferrero. J	04 Mitcham	Mi16 Mitcham Gasworks		MM62	OBJECTION TO MAIN MODIFICATION 62  Please accept this email as a formal objection to MM62  The proposed increase in the number of homes allocated to Mitcham Gasworks from 200-400 homes to 500-650 home, doubling the amount up to 10 storeys in entirely inappropriate for the site and Mitcham. The density and height will forever change Mitcham and not for the better. If anything it will mar the aspects of what is currently a relatively 'eyesore free' suburb on the edges of zone 3 in London. There has been no valid evidence to justify such a large development and with substantive reasoning. The proposed modification wanting a development to “reflect the local aspirations” is commendable BUT local input must be properly included in considerations. Previous information and local petitions have proven overwhelmingly that Mitcham residents reject plans for a development of over 400 homes and over 5/6 storeys (that height being the height of current buildings in the area). Yes housing is required but Mitcham and Merton needs quality houses to enable residents to live full and enriching lives. If the pandemic has completely slipped out of our minds, please can I remind you that it was community and immediate environment that aided people's coping mechanisms The new Local Plan is to “provide a sound basis for planning decisions” - there is NOTHING sound about the potential change to increase the density, masses and storeys of MM62. I re-iterate so there can be no confusion, I object to these changes to MM62. To all Ward Councillors and Siobhain, our local MP, I implore you to all object to these changes for now and the future. The residents of Mitcham and Merton deserve better and the site does not need to be a tick box for bureaucracy.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
133	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.29		8.1.29. A Section 10 Reservoir Act inspection report was carried out in 2014 which included statutory requirements that needed to be actioned to ensure compliance with the Act for Reservoir Safety. The council carried out a bathymetric survey of the silt levels in 2015. The council completed the Wimbledon Park Lake Reservoir Safety scheme in 2022, which has addressed reservoir safety requirements and made some improvements to the landscape and lake edge. As part of the wider opportunities of this project, the Council were able to deculvert an open section of the Wimbledon Park Brook in the public park to help create additional flood storage <b>but without fully and properly addressing the improvement of the landscape and biodiversity.</b> The lake may need de-silting to ensure its amenity and historic value, to ensure water quality is not compromised, as the climate changes and hotter summers become more frequent. <b>This however needs further assessment.</b> De silting will be likely to help to reduce the number and length of algal blooms, improve its ecological capacity, increase oxygenation and continue to use the Lake safely and fully for watersports, angling, heritage, biodiversity and amenity. <b>However desilting operations may threaten the valuable ecology of the current lake margins, would be extremely expensive to implement requiring long distance off site disposal, and there may be alternative means of promoting improved water quality for example by pumped recirculation and mechanical aeration and by restricting further siltation with silt traps at inlets. Capability Brown's lakes were quite often very shallow.</b>	No change proposed. The Wimbledon Park masterplan 2018 (LBM10) supports de-silting of the lake and the poor condition of the lake is one of the reasons that Wimbledon Park is on the Heritage at Risk register.
134	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.3		8.1.3. Wimbledon Park is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of Wimbledon Park, owned by Merton Council is currently publicly accessible, <b>although the former golf course was a municipal facility on which the public were able to pay and play with discounts for local residents</b> The All England Lawn Tennis Club's main grounds lies to the west of Wimbledon Park across Church Road and <b>a commercial arrangement with the other owners to provide land for car parking, overnight camping, the Queue and concessions in</b> the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park.	No change proposed. Details suggested are not necessary for the Local Plan's soundness.
135	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.5		8.1.5. Wimbledon Park lake is the clearest surviving feature of Capability Brown's original design. Other surviving landscape features over 200 years old include veteran trees and the presence of woodland at Horse Close <b>Wood</b> and Ashen Grove ( <b>ancient woodland</b> ). The lake is also a registered 'large raised' Reservoir under the Reservoir Act 1975, an active watersports destination and a Site of Importance for Nature Conservation, containing protected species and their habitats. The Lake connects via the Wimbledon Park Brook and surface water sewer network into the River Wandle downstream in Earlsfield.	Amendment proposed to MM112 "Horse Close Wood"
136	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.8		8.1.8. Wimbledon Park supports a wide range of sports and recreational uses including angling, watersports, athletics, bowls, hockey, cricket, mini-golf, tennis, <b>squash, netball</b> , and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play. In line with policy IN14.3 we will safeguard existing sport and recreation facilities, encourage further opportunities for sport, recreation and play, encourage co-location of services and improve community access.	No change proposed - the list of sports starts with "including" and isn't expected to be an exhaustive list
137	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.14		8.1.14. The remainder is privately owned and is not <b>openly accessible to the public, although the former golf course granted rights for the public to pay and play.</b> 30 hectares is the freehold of the All England Lawn Tennis Club. In 2016 when Wimbledon Park was added to Historic England's "Heritage at Risk" register, Wimbledon Park Golf Club was the leaseholder of this land which was used as a golf course for many decades until January 2023. The remaining c4 hectares is owned by the Wimbledon Club.	No change proposed. Details are not necessary for the soundness of the Local Plan
138	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.19		8.1.19. Younger, faster growing trees have been planted to <b>frame</b> fairways as part of the former golf course operations; sometimes obscuring the views and parkland setting and sometimes in too close proximity to veteran trees. Faster growing conifers and <b>poplars</b> planted to screen the athletics track also dominate the landscape negatively.	No change proposed. Details are not necessary for the soundness of the Local Plan

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139	40		Friends of Wimbledon Park	08 Wimbledon Park	N8.1 Wimbledon Park	8.1.25		8.1.25. It is a registered as a Grade A large, raised reservoir, regulated under the Reservoir Act 1975. The reservoir is retained by an earthfill embankment, some 320m long. The height of the embankment varies from approximately 1m to a maximum of about 4m. The Lake flows into the River Wandle downstream in Earlsfield via the Wimbledon Park Brook and the surface water sewer network. <b>For this and the fact that Wimbledon Park is in the Wandle Valley it should be included in the Wandle Valley Regional Park</b>	No change proposed. Wimbledon Park is not part of the Wandle Valley Regional Park
140	40		Friends of Wimbledon Park	15 Green and Blue Infrastructure	O15.6 Wandle Valley Regional Park		MM298	d. Support the <b>protection and completion of the Wandle Trail, as shown on the 'Wandle Trail /National Cycle Network Route 20 (NCN20)' Policies Map and the 'Indicative Cycle Network' Policies Map.</b>	Support welcomed
141	40		Friends of Wimbledon Park	15 Green and Blue Infrastructure	O15.6 Wandle Valley Regional Park			15.6.15. There are also future opportunities for the Wandle Valley Regional Park to <b>a) incorporate a large area of open space stretching from Mitcham Common and Three Kings Piece to Beddington, in the neighbouring borough of Sutton. We will continue to work with the relevant bodies to support the expansion of this green space and enable access to and from the borough.</b> <b>b) To include Wimbledon Park which is in the Wandle Valley and linked to the River Wandle by Wimbledon Park Brook</b>	No change proposed. There are no proposals to include Wimbledon Park in the designated Wandle Valley Regional Park.
142	40		Friends of Wimbledon Park	15 Green and Blue Infrastructure	O15.6 Wandle Valley Regional Park		MM298	Policy O15.6  Wandle Valley Regional Park  We are committed to protecting the Wandle Valley Regional Park and maintaining it as a strategic, biodiverse and accessible corridor through the borough We will:  a. Support the Wandle Valley Regional Park as one of London's major green networks, protecting biodiversity and supporting opportunities for formal and informal recreation through enhanced accessibility.  b. Protect and enhance the River Wandle, including its green and blue infrastructure, biodiversity and wildlife corridors.  c. Support opportunities for green infrastructure improvements to the Wandle Valley Regional Park and along the River Wandle.  d. Support the <b>protection and completion of the Wandle Trail, as shown on the 'Wandle Trail /National Cycle Network Route 20 (NCN20)' Policies Map and the 'Indicative Cycle Network' Policies Map.</b>  e. Require development within 400m of the Wandle Valley Regional Park boundary to consider its relationship to the park in terms of visual, physical and landscape links, and ensure that new development positively enhances accessibility to the park through improvements to walking and cycling.  f. Expect all new development within 400m of the Wandle Valley Regional Park to provide green infrastructure elements on site through Urban Ggreening  g. Work with the Environment Agency, Thames Water, the Greater London Authority, landowners and developers to implement flood risk reduction measures which include Ggreen linfastructure, that manage river and surface water flooding while delivering wider benefits for water and air quality, people and wildlife.  h. Encourage the celebration of the Wandle Valley Regional Park through community celebrations, arts, cultural events and sporting activities that will support and promote tourism and recreation in Merton.	Support welcomed
143	41		Gardner. N	04 Mitcham	Mi16 Mitcham Gasworks			I would like it to be noted that I object to having high rise hosts and the increased number of homes in the Mitcham gasworks area. It is not in keeping with the local area and should not be allowed. I round be grateful for an acknowledgement to this email.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
144	42		Gatwick Airport	General comment - Whole Plan				No concerns.	Support welcomed.
145	43		Gelbart. L and E	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	In 2022, Merton Council submitted a new Local Plan to the Planning Inspector for approval, which included the provision that no building in Colliers Wood should exceed the height of the current Britannia Point. In February 2024, the Planning Inspector told the Council that in his view this restriction should be removed, and that there should be no maximum height for buildings in Colliers Wood. As residents of Colliers Wood we believe it is wrong. For one, the already existing Britannia Point is completely out of character with the low-rise nature of our neighbourhood. Britannia Point towers far above any structure locally, and can be seen from as far as Streatham and Sutton. No one would approve such a structure today. It's simple common sense. It therefore makes little sense to build a tower even taller than what we have currently. Not only will any new tower further detract from the prevailing setting, but have a huge physical impact on residents too. The shadows such a structure would cast would rob homes of sunlight and further worsen the already wind impacts felt around the tower by pedestrians and cyclists. The current building creates an enormous wind vortex as one tries to walk from Colliers wood station towards Colliers Wood Christchurch. Obviously, that will become much worse if an adjacent taller building is permitted to be built. We also do not believe that such a tall building is needed to meet Merton's housing targets. Merton has a track record of meeting or exceeding its housing targets in recent years and there are hundreds of sites across the borough that could contribute to this target. It should not be on Colliers Wood to bear the brunt for meeting these targets, rather than carrying out a balanced and reasoned development plan across the borough.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.



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146	44		<b>Goble, N</b>	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		<p>Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 scheme for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed.</p> <p>Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.</p> <p>In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.</p> <p>As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs.</p> <p>Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from today with many run down/derelict buildings/sites around the borough that are not financially viable to regenerate.</p>	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
147	45		<b>Godino, P</b>	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>I hereby state my objection to the proposed removal of the clause which states that no building taller than 19 storeys shall be built in Colliers Wood. Britannia Point is already far above any local structure and can be seen from as far as Streatham and Sutton. Therefore, not only will any new tower further detract from the prevailing setting, but have a huge physical impact on residents. The shadows such a structure would cast would rob homes of sunlight and further worsen the already wind impacts felt around the tower by pedestrians and cyclists.</p> <p>Merton has a track record of meeting or exceeding its housing targets in recent years and there are hundreds of sites across the borough that could contribute to this target. It should not be on Colliers Wood to bear the brunt for meeting these targets, rather than carrying out a balanced and reasoned development plan across the borough.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
148	46		<b>Gordon, D</b>	01c Urban Development vision and objectives				<p>I have been a resident Wimbledon Hillside for over 40 years and accept that change whether through evolution or regeneration are part of the urban landscape, but consider this latest version of the Local Plan gives no consideration to any harmony between residential property and what seems an accelerated drive to create " tall buildings"</p>	No change proposed. The London Plan 2021 requires Local Plans in London to identify appropriate building heights for development throughout the borough. Tall buildings are supported in a limited number of places where there are existing tall buildings and commensurate with urban design and character and not in most of the borough.
149	46		<b>Gordon, D</b>	12 Places and Spaces	D12.6 Tall Buildings		MM236	<p>D12.6 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 now changed to Tall buildings in the borough are defined as a minimum of 21m from the ground level to the top of the uppermost storey. So the minimum has increased in size. Integra House, Alexandra Road developers have just this month produced their plans to be 46m in height, immediately massively higher than building close to it.</p>	No change proposed. Please see the Mayor of London's response to Merton's Local Plan in September 2021 <a href="https://www.merton.gov.uk/system/files/Greater%20London%20Authority%20Merton%20Local%20Plan%20Stage%203%20response%20Sept21.pdf">https://www.merton.gov.uk/system/files/Greater%20London%20Authority%20Merton%20Local%20Plan%20Stage%203%20response%20Sept21.pdf</a> which confirms that this modification has been proposed for clarity, accuracy and to ensure Merton's Local Plan is in general conformity with the London Plan As a matter of guidance, we would advise Merton to use a definition which is based on a measurement taken from the ground level to the very top of the building. Assuming a floor to ceiling height of 3m, this would result in an overall height of 21m. To be clear the Mayor would support a definition of 21m from ground level to the very top of the building. This clarity will help to avoid confusion in terms of determining planning applications and in providing guidance to prospective applicants.
150	46		<b>Gordon, D</b>	12 Places and Spaces	D12.6 Tall Buildings	12.6.6	MM239	<p>12.6.6 In instances where an applicant is proposing the redevelopment of a site immediately adjacent to the tall building boundaries and clusters identified in the Strategic Height Diagrams, local Design Guides or Design Codes may be used as part of a robust design led approach to demonstrate the appropriate stepping up of heights above or below those stated and avoid abrupt transitions in building heights.</p> <p>This change also clearly signals the message build tall, and should be reconsidered. Reading through the document I can see no reference to the wording "up to" in reference to the height of a building, everything is about the maximum therefore what opportunity would any group wishing to appeal against a proposed tall building have any grounds to do so. This plan as it stands has removed most of the planning safeguards in place in relation to height of new buildings that are appropriate for a mixed residential and commercial area.</p>	No change proposed. MM236 has been recommended to ensure the plan is positively prepared, effective, justified, in general conformity with the London Plan and consistent with national policy in relation to making effective use of land. This matter was discussed at the examination hearings in June and October 2022.
151	46		<b>Gordon, D</b>	01c Urban Development vision and objectives		1.2.43		<p>KEY OBJECTIVES: WIMBLEDON 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. In 1.2.43 the description has changed from "taller buildings" to "tall buildings" immediately changing the likelihood of any graduated building design to fit in with the existing layout of commercial and residential footprint.</p>	<p>No change proposed. Policy D12.6 Tall Buildings demonstrates that tall buildings will only be supported where they take account of surrounding development, e.g. LBM31, with proposed modifications incorporated:</p> <p>a. Their massing, bulk and height are appropriately sized and located, and demonstrate they take into account local character and heritage assets and their settings through townscape analysis of short, mid and long views.</p> <p>b. They avoid harm to the setting and significance of /or relationship with neighbouring heritage assets.</p> <p>c. They are of exemplary design and architectural quality.</p> <p>d. They respond to the council's Design Review Panel, where applicable, which provides independent design scrutiny from a panel of industry experts.</p> <p>As set out in MM6 in the Schedule of Main Modifications (Document LBM29) as part of the examination and as discussed in the Examination Hearings, the phrase "taller" has been amended to "tall" throughout the Local Plan to ensure the Plan is clear and effective.</p>

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152	46		Gordon. D	12 Places and Spaces	D12.6 Tall Buildings			D12.6 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 now changed to Tall buildings in the borough are defined as a minimum of 21m from the ground level to the top of the uppermost storey. So the minimum has increased in size. Integra House, Alexandra Road developers have just this month produced their plans to be 46m in height, immediately massively higher than building close to it.	Amendment proposed to MM251 The change in the location of measurement, from the (internal) floor of the uppermost storey (@18m above ground level) to the (external) top of the uppermost storey, for the definition for tall buildings does not result in an effective increase in height for tall buildings.  The proposed changes stems from the GLA's 6 September 2021 response to the Stage 3 consultation and the March 2022 Statement of Common Ground between Merton Council and the GLA (0D13a).  Matters regarding tall buildings were discussed at the Planning Inspectors' public hearings in June 2022 (see Matter 13) and in September 2022 (see Matter 4).  However, the proposed new paragraph below 12.6.1 (MM251) needs to be amended to be consistent with the wording in the proposed (MM239) the definition for tall buildings in the initial sentence of policy D12.6. The change to MM251 should be as follows: <b>Merton's definition of 'a minimum of 21m from the ground level to the top of the building's last habitable floor uppermost storey' provides further clarity and is equivalent to the London Plan definition of 'tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey'.</b>
153	46		Gordon. D	12 Places and Spaces	D12.6 Tall Buildings	12.6.6	MM239	12.6.6 In instances where an applicant is proposing the redevelopment of a site immediately adjacent to the tall building boundaries and clusters identified in the Strategic Height Diagrams, local Design Guides or Design Codes may be used as part of a robust design led approach to demonstrate the appropriate stepping up of heights above or below those stated and avoid abrupt transitions in building heights. This change also clearly signals the message build tall, and should be reconsidered. Reading through the document I can see no reference to the wording "up to" in reference to the height of a building, everything is about the maximum therefore what opportunity would any group wishing to appeal against a proposed tall building have any grounds to do so. This plan as it stands has removed most of the planning safeguards in place in relation to height of new buildings that are appropriate for a mixed residential and commercial area.	No change proposed. MM236 has been recommended to ensure the plan is positively prepared, effective, justified, in general conformity with the London Plan and consistent with national policy in relation to making effective use of land. This matter was discussed at the examination hearings in June and October 2022.
154	47		Greater London Authority (GLA)/Mayor's office.	02 Climate change	CC2.2 Minimising greenhouse gas emissions	2.2.21	MM23	MM23 2.2.21 The Mayor welcomes the proposed modification which makes it clear that for proposals where viability is called into question, that priority is given to those elements set out in Policy DF1D of the LP2021. Namely affordable housing and necessary transport improvements.	Support welcomed
155	47		Greater London Authority (GLA)/Mayor's office.	05 Morden	Mo1 Morden Regeneration Zone	5.1.34	MM75	Policy D9B2 of the LP2021 is clear that 'appropriate building heights should be identified on maps in Development Plans'. As such, appropriate building heights can only be established in the borough's Local Plan and not through supplementary planning guidance. More clarity on what the design code would contain would be useful in this instance, including a proviso, that it will not contain alternative building heights than those set out in the Local Plan, specifically in relation to the Morden Regeneration Zone	No change proposed. Matters regarding the tall buildings were discussed at the Planning Inspectors' public hearings in June 2022 (see Matter 13 in the Exam Library) and in September 2022 (see Matters 4 'Tall Buildings' and 8 'Site Allocations' in the Exam Library). In response to the Inspectors' post hearing letter (INSP22), in particular paragraphs 16-19, and their subsequent clarifications (INSP23), which state in paragraph 3)(b) "Yes, any references to maximum building heights should be removed in favour of referring to "appropriate" heights.", related modifications are now proposed throughout the plan. It is clear from the National Design Guide and the National Model Design Code that 'height' can be included in both design guides and codes, and to ensure that the approach to tall buildings follows the genuinely design-led approach advocated by Policy D3 of the London Plan and optimises the use of land to meet as much of the identified need for housing as possible (INSP22, paragraph 18), the following modification is proposed for all the site allocations that are identified as being suitable for tall buildings, in part 1.e. of draft policy D12.6 'Tall buildings': "...appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code which could be prepared either by applicants or the council.". This phrase is however not needed for the site allocations suitable for tall buildings within Wimbledon town centre because of the height details within the Future Wimbledon SPD (9D1).
156	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.2 Housing provision		MM139	The proposed modification is to include a requirement for at least 25% First Homes on the intermediate element of the proposed affordable housing obligation from residential development. The Mayor published a practice note on First Homes in July 2021 to assist boroughs in their policy making in this respect. It makes it clear that First Homes could make up a proportion of the intermediate element for affordable housing, but that requirements for them in Local Plans should be based on robust local and up to date evidence. It is advisable that the draft Plan takes a more flexible approach in case there is no market appetite for First Homes in the borough or if it is unsuitable as an affordable housing product for Merton's residents in some parts of the borough.	No change proposed. The requirements of Policy H11.1 concerning First Homes complies with national policy on First Homes as expressed in the 'Affordable Homes Update' Written Ministerial Statement (WMS) of 24 May 2021. We will continue to support the GLA in their evidence gathering for the London Plan review (including that on First Homes) which is likely to come forward in advance of Local Plan Review review which is currently at pre-adoption stage.
157	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.1 Housing Choice	11.1.14	MM145	The proposed modification states "On schemes where policy compliant provision of First Homes does not result in 10% of the overall housing yield of the site being available for affordable home ownership, any shortfall in this respect would need to be made up from the rest of the intermediate contribution before other types of intermediate affordable housing would be considered." The modification is ambiguous and unclear and as such could lead to poor outcomes. As such it should be amended to make be clearer, while taking into account the Mayor's comments in relation to MM139 above.	Amendment proposed to MM145 to improve clarity: <b>The policy compliant 25% First Homes contribution must make up or contribute to the 10% of the overall number of homes expected to be an affordable home ownership product. On schemes in which 25% of the affordable homes are First Homes does not deliver enough to meet the 10% affordable homeownership government requirement, additional affordable home ownership homes would need to be provided to make up this shortfall before other types of intermediate affordable housing would be considered.</b>
158	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.1 Housing Choice		MM146	The Mayor welcomes the reference to LP2021 Policy DF1 which makes it clear that on those schemes where viability is called into question, priority should be given to affordable housing and necessary transport improvements.	Support welcomed.

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159	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.1 Housing Choice		MM150	The proposed modification is consistent with Policy H8 of the LP2021 and is welcomed by the Mayor. The inclusion of a reference to Policy H8 of the LP2021 would also be welcomed as it provides a little more detail regarding the correct approach relating to matters such as the 'right of return' for existing residents. More information and guidance can also be found in The Mayor's Good Practice Guide to Estate Regeneration <sup>3</sup>	Support welcomed and amendment proposed. Suggested inclusion agreed and will be added to MM150 as follows together with additional wording to further improve clarity and consistency : <b>Estate regeneration that involves the loss and replacement of affordable housing should comply with the requirements of Policy H8 (Loss of existing housing and estate redevelopment) of the London Plan, including delivering an uplift in the quantity and quality of 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. In accordance with London Plan Policy H8 demolition of affordable housing as part of Estates regeneration must be replaced by an equivalent amount of existing affordable housing floorspace. Existing affordable housing floorspace includes both occupied and vacant floorspace regardless of the current condition of the stock. More information and guidance can also be found in the Mayor's Good Practice Guide to Estate Regeneration</b>
160	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.2 Housing provision		MM153	The proposed modification would result in the introduction of a table setting out the borough's proposed annual stepped housing targets for the period 2021/22 to 2037/38. The Mayor's housing target for Merton for the period 2019/20 to 2028/29 is for the delivery of 9,180 homes. The Mayor expects this target to be met within the period that ends in 2028/29 to be in general conformity with the London Plan. Any shortfall since 2019/20 and before the Plan period begins should be added on to the housing target so that the 10-year target can be achieved by 2028/29. The proposed stepped target for the period 2020/21 until 2028/29 is for the delivery of 5,618 new homes. According to Merton's latest Annual Monitoring Report 929 dwellings were delivered in the period 2019 to 2021 and is short of the LP2021 annualised housing target by 1,033 homes. This means that if Merton were to apply and meet the proposed annual housing targets (in this proposed modification) it would fall short of the London Plan target by 2,633 homes. This is more than 2.5 years of the borough's annualized LP2021 housing target. It is the Mayor's opinion that if implemented the proposed modification would mean that the draft Plan is not in general conformity with the LP2021. It is noted that Merton are proposing to address this deficit with an increased housing target in the period immediately post-2029, however, the modifications do represent an overall drop in the annual average delivery across the plan period which has the effect of undermining the delivery housing within London	No change proposed. Merton's proposed annual stepped target realistically sets out how the Mayor's strategic housing target for Merton will be delivered over the Local Plan Period 2021 to 2037/38, including how shortfalls will be addressed as quickly as possible in the years beyond 2029.  It is considered that Merton's stepped target represents the most realistic approach which is underpinned by robust, thorough evidence including a thorough assessment of sites to include as site allocations and a clear demonstration that all suitable options for meeting the LP2021 target have been exhausted. This approach has been extensively examined and assessed throughout the Local Plan Examination to date including two Hearing sessions held in June and October 2022 and also the extensive number of published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors Matters Issues and Questions and Inspector's requests for housing delivery topic papers.
161	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.2 Housing provision	11.2.7 and Figure 11.2.2	MM159	The Mayor notes that the proposed modification removes Figure 11.2.2 which previously clearly illustrated a stepped housing target that would meet the Mayor's ten-year housing target to deliver 9,180 homes between 2019 and 2029 as set out in Table 4.1 of the LP2021	No change proposed. Merton's proposed annual stepped target realistically sets out how the Mayor's strategic housing target for Merton will be delivered over the Local Plan Period 2021 to 2037/38, including how shortfalls will be addressed as quickly as possible in the years beyond 2029.  It is considered that Merton's stepped target represents the most realistic approach which is underpinned by robust, thorough evidence including a thorough assessment of sites to include as site allocations and a clear demonstration that all suitable options for meeting the LP2021 target have been exhausted. This approach has been extensively examined and assessed throughout the Local Plan Examination to date including two Hearing sessions held in June and October 2022 and also the extensive number of published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors Matters Issues and Questions and Inspector's requests for housing delivery topic papers.
162	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.2 Housing provision	H11.2€+K264	MM155	The proposed modification intends to set a housing target which will fail to meet the borough's strategic housing target as set out in Table 4.1 of the LP2021 which is not in general conformity with the LP2021	No change proposed. Merton's proposed annual stepped target realistically sets out how the Mayor's strategic housing target for Merton will be delivered over the Local Plan Period 2021 to 2037/38, including how shortfalls will be addressed as quickly as possible in the years beyond 2029.  It is considered that Merton's stepped target represents the most realistic approach which is underpinned by robust, thorough evidence including a thorough assessment of sites to include as site allocations and a clear demonstration that all suitable options for meeting the LP2021 target have been exhausted. This approach has been extensively examined and assessed throughout the Local Plan Examination to date including two Hearing sessions held in June and October 2022 and also the extensive number of published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors Matters Issues and Questions and Inspector's requests for housing delivery topic papers.
163	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.2 Housing provision		MM156	NEW PARAGRAPH: If the Mayor's housing target for the borough cannot be met by 2028/29 the draft Plan should clearly demonstrate how that shortfall can be achieved in the first few years after 2028/29.	No change proposed. Merton's proposed annual stepped target realistically sets out how the Mayor's strategic housing target for Merton will be delivered over the Local Plan Period 2021 to 2037/38, including how shortfalls will be addressed as quickly as possible in the years beyond 2029.
164	47		Greater London Authority (GLA)/Mayor's office.	11 Housing	H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.		MM183	The proposed modification notes the updated definition in the national planning policy for Gypsy and Traveller sites which was updated in December 2023. The Mayor welcomes Merton's intention to produce an updated assessment of need following the adoption of the Local Plan and before or during 2025.	Support welcomed.
165	47		Greater London Authority (GLA)/Mayor's office.	12 Places and Spaces	D12.6 Tall Buildings		MM239	The proposed modification is consistent with the one agreed in the SoCG between the Mayor and LB Merton on 31 May 2022 and is welcomed. It simplifies the definition of a tall building and is consistent with the one in the LP2021, and it sets out the locations considered suitable for tall buildings throughout the borough. The proposed new inclusion of part 1f is noted. This states that 'Tall buildings are only acceptable... On sites immediately adjacent to the above locations, where they would provide design-led opportunities for appropriate transitional elements between differing building scales.' To be consistent with Policy D9B2 the proposed approach would only be considered acceptable where these adjacent areas are illustrated and appropriate heights within them set out clearly on maps.	No change proposed. Please see Inspectors post hearing letter and clarifications (dated April 2023 - documents INSP22 and INSP23 in the examination library) for information on avoiding abrupt transitions between tall buildings and their surroundings. It is considered that the term "adjacent" can be understood by applicants, decision makers and others using the Local Plan without being defined on a map.

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166	47		Greater London Authority (GLA)/Mayor's office.	12 Places and Spaces	D12.6 Tall Buildings	New paragraphs below 12.6.1	MM251	The proposed modification includes a definition of tall buildings that is not consistent with the one included in Policy 12.6 of the draft Plan. Both need to be aligned with each other.	Amendment proposed to MM251 The change in the location of measurement, from the (internal) floor of the uppermost storey (@18m above ground level) to the (external) top of the uppermost storey, for the definition for tall buildings does not result in an effective increase in height for tall buildings.  The proposed changes stems from the GLA's 6 September 2021 response to the Stage 3 consultation and the March 2022 Statement of Common Ground between Merton Council and the GLA (0D13a).  Matters regarding tall buildings were discussed at the Planning Inspectors' public hearings in June 2022 (see Matter 13) and in September 2022 (see Matter 4).  However, the proposed new paragraph below 12.6.1 (MM251) needs to be amended to be consistent with the wording in the proposed (MM239) the definition for tall buildings in the initial sentence of policy D12.6. The change to MM251 should be as follows: <b>Merton's definition of 'a minimum of 21m from the ground level to the top of the building's last habitable floor uppermost storey' provides further clarity and is equivalent to the London Plan definition of 'tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey'.</b>
167	47		Greater London Authority (GLA)/Mayor's office.	12 Places and Spaces	D12.6 Tall Buildings	New paragraphs below 12.6.1	MM251	The proposed modification includes a table setting out indicative building heights in relation to storeys. The table is not clear how the building heights are measured and this creates further ambiguity. The inclusion of this table is considered to be unnecessary as building heights alone (in metres) are enough to meet the requirements of Policy D9 of the LP2021.	No change proposed. The table is clearly stated as illustrative. It acts as a guide for users of the Local Plan who are not property professionals to understand what a height in metres might equate to in storeys, and also that the same height in metres might result in a different number of storeys depending on the composition of the building. It is considered important to ensure that the Local Plan's content can be widely understood.
168			Greater London Authority (GLA)/Mayor's office.	General comment - Whole Plan				Thank you for consulting the Mayor of London on Merton's Local Plan Main Modifications consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The LP2021 was formally published on the 2 March 2021, and forms part of LBM's Development Plan containing the most up-to-date policies. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which endorse, and which are attached at Annex 1.  The Mayor provided comments on the earlier Merton New Local Plan Stage 2a consultation on 1 February 2021 (Ref: LDF24/LDD08/LP03/HA01) and the New Local Plan Publication Stage 3 consultation (Regulation 19) on the 6 September 2021 (Ref: LDF24/LDD08/LP04/HA01). In his Regulation 19 response, the Mayor made it clear that, as written, the draft Plan didn't identify on maps, locations which are considered suitable for tall buildings, nor had appropriate building heights been set out within those areas. This meant that, at that time, the approach was not consistent with Policy D9 of the London Plan 2021 (LP2021) and the Mayor considered it not to be in general conformity with the LP2021. GLA and Merton Officers worked together to resolve the general conformity issues in relation to Merton's proposed approach to tall buildings. The outcome of this collaboration resulted in proposed modifications to the draft Plan, which the Mayor considered, resolved the general conformity matters raised in his earlier response. The proposed modifications referred to, were agreed between the Mayor and LB Merton (LBM) on 24 and 25 February 2022 via a Statement of Common Ground (SoCG) and this has now been published as part of Merton's examination library <sup>1</sup> . The SoCG was again updated (May 2022) to include further clarifications on Merton's proposed approach to tall buildings; proposed modifications which the Mayor welcomed. At the request of Merton officers, the Mayor provided his opinion on the general conformity of the draft Plan with the LP2021 on 31 May 2022 (Ref: LDF24/LDD08/LP06/HA01). In that statement, the Mayor made it clear that if implemented as set out in the agreed latest SoCG between Merton and the GLA, it was his opinion that the draft Plan would be in general conformity with the LP2021.  This letter follows on from that earlier advice and, following a review of Merton's main modifications proposals, sets out where you should make further amendments so that the draft Plan is consistent with the LP2021. These comments should be read alongside the Mayor's previous responses	Support welcomed.
169	47		Greater London Authority (GLA)/Mayor's office.	General comment - Whole Plan				<b>General</b> The Mayor is pleased that the proposed modifications agreed through the SoCG, mentioned earlier, have been included in the draft Plan. However, Merton are now proposing some additional modifications in relation to tall buildings and housing targets which raise some concerns. In relation to tall buildings areas, Merton are intending to produce design codes, which is welcomed. However, to be in general conformity with London Plan Policy D9, building heights should be contained in Development Plan Documents and should not be set through Supplementary Planning Documents. Merton have also included a modification which allows for tall buildings in areas adjacent to identified tall building zones. To be in general conformity, these areas also need to be set out in maps and include appropriate building heights. In relation to housing targets, at Regulation 19, the draft Plan made it clear that the LP2021 housing target could be met for the period 2019-2029. The current consultation however includes proposed modification MM153, which now states that LBM is not able to meet its LP2021 housing target to deliver 9,180 new homes for the period 2019/20-2028/29 as set out in Table 4.1 of the LP2021. It is noted that this is due to a revision of Merton's housing trajectory after a review of a number of large sites. The reasons for this are understood. It is noted that in the event that LBM were not going to meet their 10 year LP21 target, they should have clearly demonstrated that all suitable options for meeting the LP2021 target have been exhausted. This therefore raises a general conformity issue, although the late stage of the plan-making process and testing of the spatial strategy through the examination is recognised. Where a borough cannot clearly demonstrate that the 10-year target will be met by 2028/29, it should add the shortfall to the target identified beyond 2028/29 (including any shortfall in delivery in the period from 2019/20 until the start of the Plan period), demonstrating how the deficit can be made up as quickly as possible in the first few years beyond 2029. It is noted that Merton are proposing to address this deficit with an increased housing target in the period immediately post-2029. However, it is also noted that the modifications also represents an overall drop in the annual average delivery across the plan period. Although the aggregate target has been increased to 12,084 compared to 11,732 at Regulation 19, this is over an additional 2 years. This has the effect of reducing the average annual target of 782 units from Regulation 19 (over a 15 year period) compared to 710 units at main modifications (over a 17 year period). As such, this has the effect of undermining the delivery housing within London. As currently written, the Mayor considers that the proposed modifications in relation to the borough's housing target would result in the draft Local Plan not being in general conformity with the LP2021. Noting this is main modifications, GLA officers are happy to continue to offer their support going forward to resolve the general conformity issue raised in this letter. Detailed comments on the proposed main modifications to Merton's Local Plan are set out in the table below. <b>(LBM note- the following cells)</b>	Amendment proposed to MM161 to provide minor updates to Merton's housing trajectory to ensure it is up to date. Merton's proposed annual stepped target realistically sets out how the Mayor's strategic housing target for Merton will be delivered over the Local Plan Period 2021 to 2037/38, including how shortfalls will be addressed as quickly as possible in the years beyond 2029.  It is considered that Merton's stepped target represents the most realistic approach which is underpinned by robust, thorough evidence including a thorough assessment of sites to include as site allocations and a clear demonstration that all suitable options for meeting the LP2021 target have been exhausted. This approach has been extensively examined and assessed throughout the Local Plan Examination to date including two Hearing sessions held in June and October 2022 and also the extensive number of published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors Matters Issues and Questions and Inspector's requests for housing delivery topic papers.

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170	47	Greater London Authority (GLA)/Mayor's office.	Site allocations - multiple chapters	CW2, Mi1, Mi16, Mo4, RP3, Wi12,		MM 44, MM56, MM62, MM86, MM95, and MM120	The proposed modification sets out that buildings of around 52m in height (or another height in relation to the specific allocation listed in the first column cell) may be appropriate on this site, and this is consistent with Policy D9 of the LP2021 and is welcomed. However, the following sentence states that "...appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code which could be prepared either by applicants or the council". Policy D9B2 of the LP2021 is clear that 'appropriate building heights should be identified on maps in Development Plans'. As such appropriate building heights can only be established in the borough's Local Plan and not through supplementary planning guidance. More clarity on what the design code would contain would be useful in this instance, including a proviso, that it will not contain alternative building heights than those set out in the Local Plan site allocation. A more suitable approach may be for the site allocation to include an appropriate range of heights and the future design code could then be more precise about how heights are to be distributed in the area within that range.	No change proposed. Matters regarding the tall buildings were discussed at the Planning Inspectors' public hearings in June 2022 (see Matter 13 in the Exam Library) and in September 2022 (see Matters 4 'Tall Buildings' and 8 'Site Allocations' in the Exam Library). In response to the Inspectors' post hearing letter (INSP22), in particular paragraphs 16-19, and their subsequent clarifications (INSP23), which state in paragraph 3)(b) "Yes, any references to maximum building heights should be removed in favour of referring to "appropriate heights.", related modifications are now proposed throughout the plan. It is clear from the National Design Guide and the National Model Design Code that 'height' can be included in both design guides and codes, and to ensure that the approach to tall buildings follows the genuinely design-led approach advocated by Policy D3 of the London Plan and optimises the use of land to meet as much of the identified need for housing as possible (INSP22, paragraph 18), the following modification is proposed for all the site allocations that are identified as being suitable for tall buildings, in part 1 e. of draft policy D12.6 'Tall buildings': "...appropriate design-led height parameters for this site should be informed by a Design Guide or Design Code which could be prepared either by applicants or the council.". This phrase is however not needed for the site allocations suitable for tall buildings within Wimbledon town centre because of the height details within the Future Wimbledon SPD (9D1).
171	48	Grosvenor.D	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	I oppose the Idea of any building above 6 storeys in Colliers wood and surrounding area. It's not bloody New York or Hong Kong you know.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
172	49	Hill.S	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -2036/38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 scheme for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.  As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.  In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.  As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.  These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June 2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
173	50	Historic England - Archaeology Advisor - Stevenson, M	15 Green and Blue Infrastructure				As a Non-Designated Archaeology Advisor, I have considered the proposed additions and deletions as contained within the following four documents: lbm29_schedule_of_main_modifications_dated_january_2024 While it should be noted that my Historic England policy team colleague will respond under separate cover, I note on page 118, Topic 7: Heritage (including landscape, architecture and archaeological heritage) my comment is that the scope of 'archaeological heritage' should reference both statutory designated and non-designated heritage assets. lbm30_schedule_of_additional_modifications_dated_january_2024 While it should be noted that my Historic England policy team colleague will respond under separate cover, I specifically note and support on page 70, AM354 p.627 the changes regarding Archaeological Priority Areas. lbm31_mertons_local_plan_incorporating_proposed_modifications_february_2024 While it should be noted that my Historic England policy team colleague will respond under separate cover, I support this document. lbm32_sustainability_appraisal_of_mertons_local_plan_dated_january_2024 While it should be noted that my Historic England policy team colleague will respond under separate cover, I support this document.	Support welcomed.

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174	51		Housden. M	08 Wimbledon Park	W13 All England Lawn Tennis Club Church Road			<p>You have asked for comments on the main modifications to Merton's draft local plan . The documents enclosed run to hundreds of pages and have been prepared by persons employed by Merton to do this full time for their living . It is clear from the content of the initial 163 pages , that Merton's local plan is heavily focused on climate and green matters . The modifications have the appearance of not only being orchestrated by the green woke contingent of Merton Council but also of being adapted to make it easier for Merton council to do that which it ( Merton Council) wishes to achieve, where the possibility exists that Merton council may be prevented from achieving its goals by the opposition of its residents .</p> <p>A prime example of such tinkering is the adjustments to the AELT site on page 161</p> <p>It is clear that Merton Council is totally unconcerned about all its excessive, out of perspective, green initiatives , when Merton Council believes it can make money for itself</p> <p>If Merton really believed in its green rhetoric it would not have voted to ignore the covenant associated with this park land currently comprising a golf course as part of a Capability Brown designed Grade 2 registered park .</p> <p>It would also not change the original wording of its former plan ( delete paragraph 7 ) to facilitate and make it easier to concrete over the majority of this land and demolish a Grade 2 registered park for the benefit of AELT .</p> <p>Whilst it is impossible to read every word that Merton's paid full time employees have written it is clear that Merton's approach is a disgrace and intended to manipulate democracy . It is a disgrace because Merton is ignoring the cost to its residents of its head long rush to go green, but is wanting to cram in the Borough numerous further houses and redevelop the centre with high rise buildings .</p> <p>Most EU countries have now realised that rushing forward with excessively short time horizons is not sensible and are rowing back on imposing unnecessary hardship on its citizens when Europe's contribution to climate change is minimal relative to other economies and the precise causation now claimed, was not a contributing factor in historic climate changes .</p> <p>Notwithstanding Merton's rush to impose revenue earning measures and additional expense on its residents, Merton seeks to develop Merton with High rise buildings unwanted by residents and, aid with its tweaks referred to above , the development of a park for the benefit of AELT club again when unwanted by its residents .</p>	No change proposed to the council's overall Local Plan strategy.
175	51		Housden. M	General comment - Whole Plan				<p>I have already sent in a response to the below reminder .I further hope Merton will be more prudent with its finances going forward and think carefully about rushing into redevelopment that ratepayers do NOT want before they follow Birmingham into bankruptcy It could also revert to producing its publications in the language of this country ( English ) rather than an additional 15 other languages once again at the expense of rate payers . Stop messing with grandiose plans and focus on what resident want .Residents do not want green spaces turned into tennis courts or high rise buildings Wimbledon is desirable just as it is .It's the village concept that resident want and desire - not council officials trying to make a name for themselves or leave their ugly stamp on our infrastructure</p>	No change proposed. The council did not receive any request to print the draft Local Plan in any other language to date.
176	52		James, J	04 Mitcham	M16 Mitcham Gasworks		MM62	<p>Dear all,</p> <p>This email is in response to the latest modification to the planned development of the Mitcham gasworks site.</p> <p>MM62 indicates a significant increase in the number of allocated dwellings and an increase to height of the proposed buildings. What is the evidence for these increases? I live very close to the site. This is a deprived and under-resourced area with more betting shops than actual shops in the town centre, with amenities and services that are struggling to provide for residents already in the area and with seeming no hope of any meaningful regeneration. We residents have made it clear that high rise buildings are not in keeping with the other buildings in the area and would look unsightly. We want buildings to be built that complement the area that we live in! We want houses built that families can live in comfortably. We want to see evidence that amenities and services are being improved in the area.</p> <p>It doesn't feel like we, the people who live here and will have to deal with all the potential problems if this is given the green light are being listened to; every modification seems to go against the concerns that have been raised by us previously - why is that?</p> <p>I've come to the cynical conclusion that someone or people will clearly benefit if this latest iteration of the planned development goes ahead, I know for sure it won't be the residents who already live here nor will it be any family these proposed dwellings are supposedly being built for.</p>	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
177	53		Jennings. T	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>As a long term resident of Colliers Wood - as indeed my grandparents lived and raised my mother - I am shocked to discover that the Planning inspectorate are even thinking about allowing high rise buildings, presumably with the logic of "well someone right royally screwed up once so what the heck LOL YOLO" etc</p> <p>If anything the Black &amp; Root/Britannia should have served as a cautionary tale about the ugly blight such monstrosities force upon the natural low rise landscape.</p> <p>Messing up (or rather being forced) once to allow Britannia Point to somehow be passed is bad enough, but to then compound the error to allow it to become the norm in Colliers Wood and the surrounding area will cause immeasurable harm to existing residents' quality of life, and light. There are very clear pockets and places for regeneration of brownfield sites and other areas in order to meet quotas. As inter alia LBM28 and LBM28a show.</p> <p>This is the way forward. Slow and careful management, not allowing some wild west free-for-all and we'll worry about infrastructure and unintended consequences for some planning inspectorate in the future.</p> <p>My mother is as appalled as me at the idea of more monstrosities being built, ruining the landscape and 'feel' of Colliers Wood. If people want to live in some soulless vertical urban hellscape, then they are free to go enjoy the brave new world of Central London, or along the Thames at Wandsworth, or any other areas of unnatural ugliness that can at least be contained and not allowed to spill out and spread like a cancerous growth. You can stick cladding on a tumour, but it's still a tumour.</p> <p>Let another one, or two, or five sprout up, just because and oh well we have some targets to reach, and you've got a real problem, far surpassing the original cover-up.</p> <p>Leave the suburbs alone - at least limiting heights to reasonable amounts which fit into the existing ambience and infrastructure, like traffic and so forth. There may well be 'targets' to be met, and immediate short-term problems to be solved: but as the Brown &amp; Root tower has proven, it is impossible to unring a bell.</p> <p>Hell is paved with good intentions. So I implore you to consider the ramifications of your high rise future very carefully before allowing the floodgates to open on our still somewhat cute little low rise suburban heaven.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
178	54		John Innes Society (The)	05 Morden	N5.1 Morden and D12.6 Strategic heights diagram			<p>We wish to lodge strong objections to the current proposals for the development of Morden. No meaningful public consultation has taken place since 2021 and then it only registered very few responses from a catchment area of some 6,000 households, yet that has been used as evidence of public approval for massive intensification. It was not.</p>	No change proposed Merton's Local Plan - consultation statement 2021 (0D8) and more specifically, the council's response to Matter 15, Issue (I), Question 6 from the Planning Inspectors, before the public hearings in June 2022, set out in detail the comprehensive public consultation that has been carried out with regards to the regeneration plans for Morden. Since the submission of the draft Local Plan in November 2021, there has been no further consultation on the regeneration plans for Morden, while the Inspectors' report on the proposed site allocation within the draft Local Plan and its subsequent adoption, is awaited.

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179	54		John Innes Society (The)	05 Morden	N5.1 Morden and D12.6 Strategic heights diagram			When that consultation was carried out, assurances were given that any tall new building within Morden Town Centre would be no higher than the Civic Centre (58m). Since then, a Strategic Heights Diagram – Morden Regeneration Zone has appeared, showing a core area in Morden where tall buildings of "circa 71m could be appropriate" and a Regeneration Zone boundary of a wider area, abutting residential areas, "where building of circa 39m could be appropriate". Morden is in the flood plain of the River Wandle. Have any studies been undertaken to establish whether its subsoil would be capable of supporting a 71m high building without affecting the Water Table?	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Supported by studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1), earlier versions of the draft local plan have not included references to the Morden Civic Centre building as being a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone. The proposal that the Morden Civic Centre building should be a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone, had been raised in a number of representations, at various consultation stages for the draft local plan. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text for the tall buildings cluster within the Strategic Heights Diagram for the Morden Regeneration Zone, now states that it is an indicative location for a "...tall building cluster where buildings of circa 71m could be appropriate, ..." and paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code. The Merton Strategic Flood Risk Assessment Online Map (15D7) shows that no part of the Morden Regeneration Zone is within Flood Zone 2 or 3.
180	54		John Innes Society (The)	05 Morden	N5.1 Morden and D12.6 Strategic heights diagram			Building on that scale and density would transform Morden from a useful and functioning town centre and transport interchange, into an urban jungle lacking any attempt at human scale. Its only purpose would be to pacify those who set targets for new housing without any thought as to quality of life. Where are all those new residents going to work, be educated, seek Health Care or leisure and recreation? Unless appropriate sites are allocated and safeguarded for social infrastructure then these are plans for social unrest and poor health. The tall blocks of flats at Phipps Bridge had to be demolished because they caused just such problems. Policies referring to social infrastructure are hollow unless sites are provided. In this Local Plan, every potential site is allocated for high density housing throughout the Borough. That is unsustainable. On the Plan as a whole, we have seen the representations from the Wimbledon Society and wish to register our support for them.	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Supported by studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1), earlier versions of the draft local plan have not included references to the Morden Civic Centre building as being a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone. The proposal that the Morden Civic Centre building should be a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone, had been raised in a number of representations, at various consultation stages for the draft local plan. Matters regarding the Morden Regeneration Zone site allocation and Infrastructure, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4, 8 and 9 Issue(ii) within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text for the tall buildings cluster within the Strategic Heights Diagram for the Morden Regeneration Zone, now states that it is an indicative location for a "...tall building cluster where buildings of circa 71m could be appropriate, ..." and paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code.
181	55		Joyce, J	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	I would like to object to this proposal. I believe that the building of tall buildings in Colliers Wood is contrary to the look and feel of the neighbourhood. In addition, densely populating the area further is currently not supported by the services available to residents, for example, nurseries are over subscribed, primary school is over subscribed, there is no secondary school and it is not possible to get an appointment at the doctors surgery. There is also a considerable problem with fly tipping, litter and street cleanliness.  The current tall building in Colliers Wood has been an absolute disaster. I am fully supportive of relaxing planning generally and am fully aware that there is a housing shortage and people need places to live, but these need to be quality homes with sufficient supporting services.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
182	56		Kane, W	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	Please do not build higher. It is already dark and depressing in Colliers Wood, without building higher, stopping the sunshine to reach the streets	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
183	57		Lee, C	04 Mitcham	Mi16 Mitcham Gasworks		MM62	Good afternoon I want to add my objection to the proposal of new flats being built on the gaswork site. While I agree Merton needs more affordable housing there is no way Mitcham can accommodate this amount of houses in such a small site. The roads are already grid locked. Schools are over subscribed. Local doctors surgeries are too busy. There isn't even enough good local shops or amenities. Also there is no new evidence that I'm aware of saying it is safe to build on a the site.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a> . Please also see LBM16 Merton's Infrastructure Delivery Plan which assesses the infrastructure needed to support new homes (school places, healthcare, digital infrastructure etc) <a href="https://www.merton.gov.uk/system/files/lbm16_-_merton_infrastructure_delivery_plan_-_september_2022.pdf">https://www.merton.gov.uk/system/files/lbm16_-_merton_infrastructure_delivery_plan_-_september_2022.pdf</a>

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184	58		<b>Letbe-Holder, E</b>	04 Mitcham	M16 Mitcham Gasworks		MM62	<p>I hope I'm not too late to register my extreme disappointment that the idea of permission for 10 storey buildings on the Mitcham Gasworks site, has again surfaced in the local plan.</p> <p>This flies in the face of everything local residents have told the council, but passionately and urgently for several years now. There were many representations made by residents when the issue went to the planning committee and was refused, how many times do we have to state that Mitcham does not want its character permanently altered in this way? Please, as our representatives, take our wishes into account and restrict the height allowed on this site to that of neighbouring properties, none of which are above 6 or 7 stories tall.</p> <p>I hope you will hear us this time and put the idea of overly tall tower blocks on this site to bed for good.</p>	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
185	59		<b>Lines, S</b>	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	<p>Britannia Point is already out of keeping with the rest of Colliers Wood. These days when councils do not properly police or enforce building regulations it is foolish to invite more inhuman built up environments. It seems to have cost the Council a lot just to get the greedy irresponsible developer of Britannia Point to face up to any accountability in their incompetent irresponsible dangerous build as shown by the window fiasco. Don't further rip the heart of out of the Colliers Wood community soul with more soul-less monstrosities no one cares for.</p> <p>Be creative and inventive and make our borough a place of soul where people actually want to live and be proud of. Let's try not to sink to the lowest common denominator in taste and style for the short term acclaim of getting any old "units" built for the sake of quotas and tick boxes.</p> <p>Let's go for community and integrity and some self respect in the area. Let's make the most of the green and historic area and its historic and beautiful rive - the one people not so long ago revived from a dead and brown unloved refuse pit.</p> <p>Let's value imagination, self respect, sustainability and long term thinking instead. Let's keep and further the Colliers Wood identity.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
186	60		<b>London Parks and Gardens</b>	08 Wimbledon Park	N8.1 Wimbledon Park			<p>I write as a member of the Planning and Conservation Working Group for London Parks and Gardens (LPG). LPG is affiliated to The Gardens Trust (TGT) — a statutory consultee in respect of planning proposals affecting sites included in Historic England's Register of Parks and Gardens. LPG is the County Gardens Trust for Greater London and makes observations on behalf of TGT in respect of Grade II registered sites and may also comment on planning matters affecting other green open spaces of historic interest, especially when included in LPG's Inventory. In London Borough of Merton, historic green spaces are listed on the LPG Inventory and will be affected by the Local Plan policies proposed. A list of the sites we regard of heritage merit can be found here.</p> <p>Given our role as a statutory consultee status as part of The Gardens Trust, we wish to highlight several concerns and suggestions regarding policy N8.1.</p> <p>1. Heritage at Risk and Policy Recommendations</p> <p>We recommend removing policy N8.1 and introducing a more targeted amendment to ensure protection of heritage assets at risk. Specifically, we suggest adding a new policy:</p> <p>1. "Proposals affecting heritage assets on the 'at risk' database must comprehensively address the reasons for their at-risk status."</p> <p>2. Landscape Management Plan</p> <p>We propose the development of a Landscape Management Plan for Wimbledon Park, to be collaboratively crafted with key stakeholders including the London Borough of Wandsworth and local community groups. This plan should be completed within one year of this Plan's adoption, with a clear commitment from Merton Council for funding and implementation within five years.</p> <p>3. Rationale for Adjustments</p> <p>The existing modification N8.1 does not adequately protect Wimbledon Park's heritage. The focus on development over conservation could undermine the historical and ecological value of the park. Our suggestions aim to realign the plan with national policies on heritage conservation and ensure effective stewardship of Wimbledon Park.</p> <p>We appreciate Merton's efforts in updating the Local Plan and hope our feedback contributes to a robust strategy that respects and enhances the heritage assets within the borough.</p>	No change proposed. The creation of policy N8.1 arises from extensive discussion throughout the Local Plan examination including the public hearings and site visits. It is considered that it would greatly weaken the significance of Wimbledon Park in the local plan to remove any policy reference to Wimbledon Park within the Local Plan.
187	61		<b>Love Wimbledon</b>	09 Wimbledon	N9.1 Wimbledon			<p>On behalf of Love Wimbledon, the Business Improvement District for Wimbledon Town Centre, please find herewith our thoughts on the revised Merton Local Plan. Please note given we operate exclusively within Wimbledon Town Centre, we have reserved our comments exclusively to our geographic area of responsibility.</p>	No change proposed; none proposed in this part of the representation.
188	61		<b>Love Wimbledon</b>	09 Wimbledon	N9.1 Wimbledon			<p>Wimbledon Town Centre Context</p> <p>Footfall and expenditure data for Wimbledon Town Centre is currently hugely encouraging, with footfall above pre-pandemic levels, and expenditure rising to 33% higher than the weighted 6-year average (Source: GLA High Streets Data). This reaffirms the town centre's resilience post-pandemic and continuing success as a place offering retail, culture, hospitality, leisure and work opportunities. Many newer developers are now actively engaged with local communities too, creating thoughtful and human-centric designs for the future, such as the proposed Gather hotel in Worple Road, recently submitted to Merton's Planning Committee.</p> <p>We have developed an overview of areas which we believe require particular attention in the new Local Plan. We have witnessed a change in post-pandemic needs, particularly regarding office space, and it is important that we manage developments' heights and sizes to suit the area's evolving requirements. This area deserves its own vernacular based on local surrounding including the low-rise residential streets, and should not be the destination for buildings which could be designed for any city in the world. There needs to be a strong balance between development and occupancy for now and in the future, ensuring over-development does not damage Wimbledon's identity.</p>	No change proposed. Policy N9.1 supports this approach.
189	61		<b>Love Wimbledon</b>	09 Wimbledon	N9.1 Wimbledon			<p>01 Offices / CBD</p> <p>• We are supportive of a thriving central business district, clustered around St George's Road, to support Wimbledon's continuing success as Merton's primary economic engine. We welcome new office developments or retrofitted office spaces that are energy efficient, attractive and in keeping with the local architectural vernacular, to retain existing and attract new employers to Wimbledon. The development at 247 The Broadway is an excellent example of the progress being made with this, and follows a similarly successful development in Wellington House, on Wimbledon Hill.</p>	Support welcomed.
190	61		<b>Love Wimbledon</b>	09 Wimbledon	N9.1 Wimbledon			<p>We have concerns about some of the proposed scaling within the CBD outlined within the draft Plan, and also the location of the proposed 42m zone within clearly residential roads. We are not opposed to tall buildings, but right now we are acutely aware that most of our largest employers in the town centre are looking to relocate or sublet floors within their premises, to reduce their office allocation levels</p>	Amendment proposed to the indicative strategic heights diagram for Wimbledon to align with the policy as written Wimbledon town centre that supports buildings with a range of height commensurate to existing Wimbledon town centre building heights and on consideration of character and appearance.
191	61		<b>Love Wimbledon</b>	09 Wimbledon	N9.1 Wimbledon			<p>Given many businesses are reporting significantly lower office occupancy post-pandemic, we are concerned that new buildings at 49m scale could have significant non-occupancy, which would have a negative impact on the perception of the town centre. Work has still not commenced on the St George's East building approved by Merton planning in 2022, presumably because of both construction costs and ongoing uncertainty in the office sector. We should request that the developers now provide a coherent plan for occupancy before any new building work commences.</p>	No change proposed. The Local Plan is a 15-year plan and speculative offices have continued to seek planning permission in Wimbledon town centre throughout and following the pandemic due to the attractiveness of the area: internationally recognised location, excellent transport access, close to green spaces and good infrastructure and schools, representing a viable alternative to businesses who no longer wish to locate in central London. This is key to attracting new businesses into Wimbledon. There are vacancies in older offices while new builds and new refurbishments are continuing to be attractive to businesses and continuing to have high yields and normal levels of market churn.



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192	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			With new schemes locally, our view is it would be better to scale down proposed new developments to the existing height of the major commercial premises on St George's Road, and develop plans to attract businesses to relocate to Wimbledon in first-class new offices. Our priority should also not only be to build new premises on unworkable current sites, it is equally important that we retrofit currently neglected buildings such as One Francis Grove, to make them marketable again for attracting new businesses into Wimbledon.	No change proposed. The Local Plan is a 15-year plan and building heights around St George's Road are based on the extensive public consultation and analysis carried out for the FutureWimbledon SPD which also considered prevailing building heights around St George's Road. We would welcome the retrofit of One Francis Grove or its redevelopment as per planning permission (19/P3814) granted in December 2020.
193	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			Transport I Air Quality/ Sustainability/ Greening • We remain concerned about traffic and air quality within the town centre, the overall experience for pedestrians and cyclists navigating the town centre and the lack of public spaces. The proposed pedestrianisation of St Mark's Square, identified as a priority public realm project in the Wimbledon Masterplan, would be a welcome addition to the town centre to address this.	No change proposed. Policy N9.1 Wimbledon and other Local Plan policies address air quality and sustainable travel improvements. Delivery of travel initiatives can take place outside the planning system
194	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			It is imperative that a person-first methodology is considered for long term public realm works (widening footpaths, reducing traffic lanes) and creating greener corridors to encourage walking. We are also concerned that often 'greening' referenced in planning schemes is not then put into action, e.g. outside Premier Inn and outside New Wimbledon Theatre, whereby planning applications were different to actual delivered changes with less or no greening. These sites should be revisited, and there is still considerable local frustration that these schemes have not delivered what was promised	No change proposed. LoveWimbledon were involved with the council on the Met Police advice on hostile vehicle risk management around Wimbledon town centre and the measures, including metal bollards necessary for public safety installed outside Centre Court Shopping Centre and New Wimbledon Theatre as hostile vehicle harm prevention.
195	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			Wimbledon Town Centre has suffered from a lack of investment into Cycle Lanes and improved connectivity for bikes, this needs to be a confirmed part of the long-term plan. We are also seeing increasing number of e-bike hires being left in awkward places around the town centre, creating obstacles for the visually impaired, and users of wheelchairs and pushchairs. The current parking bay solution on Wimbledon Bridge has not worked, this should be moved to nearer the station (emphasising bikes over cars) and appropriate signage / edging added. A long-term solution to bike parking would be welcomed.	No change proposed. Please contact the e-bike hire companies if you see e-bikes discarded in inappropriate places as they will take action to move them and work with their customers to dissuade this from happening again. These matters relating to more immediate travel measures not connected with the planning system have been passed to the council's Traffic and Highways team.
196	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			Delivery Bikes -- we have increased issues (like much of the country) with delivery bike parking. As Deliveroo and Uber take no accountability of their self-employed workforce, we see anti-social behaviour, dangerous driving, and no facilities provided for the drivers. This needs to be tackled on both a national and local level. On a local level a better solution to where mopeds are idling needs to be found, as the solution at Wimbledon Bridge has not worked, and the issue has just been displaced to other areas in the town centre.	No change proposed. These matters relating to more immediate travel measures not connected with the planning system have been passed to the council's Traffic and Highways team.
197	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			We agree that the safeguarding strategy to create more bridges for cars should be removed unless they can demonstrate they reduce traffic for the town centre and the surrounding neighbourhood. There is evidence that more roads just bring more cars. However, we would be supportive of pedestrian and cycling bridges that improve town centre connectivity for these groups.	No change proposed. The aspiration to build another bridge to the north of the town centre has been removed as there is no evidence to support that government funding will be available for such a substantial project within the 15-year lifetime of this Local Plan (either via Crossrail2 or another government source)
198	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			We anticipate a surge in visitors over the next few years, drawn to Wimbledon by ongoing sporting excellence and everything it offers to visitors looking to seek a different aspect of London-very much the strategy for international inbound visitors being developed by London & Partners. To support this, the station needs to have a clear investment strategy to make it attractive, practical to use and to ensure it reflects how Wimbledon should be perceived on an international platform - a green and inspiring place to visit, and London's only train/ tube/ tram I bus interface. The current platforms and general visitor experience should be considerably upgraded to enhance their experience.	No change proposed. We would wholly support investment in the Network Rail / Transport for London Wimbledon Station
199	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			Similarly, any future development in the Wimbledon Park area for AELTC (assuming their proposed scheme is approved) must give special consideration to a clear sustainable transport solution from the main station in Wimbledon to the new site, as it will significantly increase the number of users of the station over a longer period of time than our current 2-week surge around the Championships.	No change proposed. Any increase in the number of visitors to Wimbledon Park from any of the three landowners will be required to prioritise sustainable travel in line with the travel policies in Chapter 16
200	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			03 Conservation • Conservation of our heritage including the improvement of historical buildings, spaces and places of architectural merit should always be invested in and considered in both strategic decisions and everyday decisions. At the moment, the word 'conservation' does not give any legislative outline to maintain and improve buildings in these areas and we often see shop frontages and signage which do not merit the buildings they reside in, with conservation guidelines often ignored for ungainly signage. To create a better-quality environment, the conservation regulations in Wimbledon Town Centre should be changed to be mandatory in highlighted areas.	No change proposed. Regulations relating to conservation areas such as the Planning (Listed Buildings and Conservation Area) Act 1990 are set nationally.
201	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			04 Place for Business • We believe it would be beneficial to have a business strategy to attract sectors in which we have excellence, much in the same way that some areas are looking at Life Sciences (e.g. SC1, in SE1), or cancer research (Sutton). We believe the Borough should become a hub for sports business (include tech and communication), together with associated sectors around health, fitness and wellbeing. We already have several world-leading businesses operating in this space, and it would further endorse Merton's strategy to be recognised as the Borough of Sport.	No change proposed. Not a Local Plan matter.
202	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			• A good example of this occurred this week, when Mountain Warehouse announced its closure in June. Love Wimbledon contacted the landowner to discuss specific known shortages in our current town centre offering, but they had already arranged for a Popeye's Chicken to open on the site. While we welcome retail units not being vacant, we are concerned that this will only make our over-dependency on convenience food outlets ever more unsustainable, and lead to further unhappiness from consumers regarding the lack of retail within Wimbledon now.	No change proposed. Government's national planning rules support maximum flexibility for business premises and landowners are not required to seek planning permission from their local council to convert a building from a shop to restaurant, café, GP surgery, estate agent, indoor sports, creche and other business activities.
203	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			In light of successful new commercial developments, such as 247 The Broadway and Wellington House, the successful transition of Centre Court Shopping into Wimbledon Quarter, and the forthcoming arrival of a major new boutique hotel for Wimbledon when Gather hopefully opens in 2027, we ask Merton Council to work with us and invest more in creating a placemaking strategy for Wimbledon that celebrates its heritage, culture, green spaces, retail and hospitality choices, and connectivity. This will drive new business and further footfall into Wimbledon and future-proof its ongoing success.	No change proposed. The FutureWimbledon SPD 2020 is Wimbledon town centre's placemaking strategy and the sites listed in the representation are all contained in the FutureWimbledon SPD and represent its ongoing successful delivery.
204	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			The Local Plan discusses the desire to activate empty retail units as pop-ups for businesses or cultural experiences. We welcome this, but it requires much greater enforcement with property owners who are not local - e.g. investment and pension fund portfolios. We do not have many empty retail units in the town centre currently, but those we do have, such as the former Auntie Ann's and San Lorenzo units, are operated under complex ownership arrangements in which there appears to be no time pressure to provide a solution. We want to see a legal commitment to getting changes in place to bring in short-term pop-up activations that provide more affordable spaces for smaller and newer businesses, or at minimum to dress the vacant frontage to an acceptable standard. The long-standing eyesore at the former O'Neills Pub on the Broadway is a good example of this.	No change proposed. The Local Plan already contains policies to support meanwhile uses via the planning system.
205	61		Love Wimbledon	09 Wimbledon	N9.1 Wimbledon			05 Street Level Design • The Pavement, a colonnade of independent shops and services located on Worple Road, is not highlighted as a Neighbourhood Parade strategy for investment. These shops are in a conservation area, in stunning Edwardian buildings, and provide local and essential services for residents and businesses. They are located opposite Wimbledon Library and the Alexandra pub (both of similar strength architectural merit, as highlighted in the consultation). These buildings should be brought up to the same standards as the surrounding buildings on Wimbledon Hill. Previous bids for funding via Neighbourhood Community Infrastructure Levy (NCIL) to make this investment has proven unsuccessful, but investing in refurbishing the shop fronts of the Pavement would be a significant enhancement to the town centre and a celebration of independent retail continuing to thrive.	No change proposed. Please speak to the council's Regeneration and Economy Team about the previous Neighbourhood Fund allocation for Hartfield Walk which also included a contribution to support cleaning the Pavement shopfronts and awnings.
206	62		Marks .M	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 .MM44	It is an insult to Colliers Wood to remove this restriction, after one removal and subsequent reinstatement. The Tower/Britannia Point is a 1960s planning aberration which dwarfs everything for miles around and is already setting a precedent by distorting the Local Plan into allowing more buildings of the same height. The council already agreed to it being squared off (increasing its shadow) and a six-storey lump added to the front when it was clad. To contemplate casting shadows over an even larger area beggars belief. Criterion Capital has demonstrated repeatedly its contempt for its neighbours, most recently by leaving scaffolding erected around the base for 18 months, blocking the cycle lane on the High Street, after failing to eliminate the risk from falling glass. It treats its residents just as badly by failing to maintain their services properly. The more it is allowed to build on site, the greater the risk to council tax payers from the council having to take action against its illegal behaviour.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.

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207	63		Maslin, P	04 Mitcham	Mi16 Mitcham Gasworks		MM62	<p>I oppose the change to the site allocation for the old Mitcham gasworks site - specifically, a change from 200-400 homes to 500-650 homes.</p> <p>As demonstrated by an ample number of responses to planning application 22/P3620, whilst the local community are supportive of the idea that the site is used to build new homes, there are deep concerns that the only proposal put forward thus far suggested building 595 flats, about a third, single aspect, when what would address the need for family homes better would be a smaller number of units comprising a mixture of houses and flats.</p> <p>If the change to the site allocation is allowed, this will surely pave the way for a resurrection of planning application 22/P3620 or something similar. In turn, there will undoubtedly be a massive community campaign opposing it.</p>	<p>No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a>) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a></p>
208	64		Merton Centre for Independent Living	01b Good Growth		1.2.49	MM7	<p>Chapter 1b – Good Growth Strategy – Main Modification 7 1.2.49. states that the Opportunity Area Planning Framework 'would be prepared in a collaborative way with Merton's diverse communities (including children and young people, Black, Asian and other ethnic minority groups, businesses and stakeholders).' It then goes on to list key priorities, including 'creat[ing] mixed and inclusive communities' and 'tackling inequalities and environmental, economic and social barriers that affect the lives of people in the area.' In light of the emphasis on recognising diversity, valuing inclusivity, reducing inequality, and removing social barriers, we suggest that it would be apt to include Deaf people and Disabled people in the list of examples of communities</p>	<p>The council has made appropriate change to the paragraph.</p>
209	64		Merton Centre for Independent Living	11 Housing	H11.1 Housing Choice	11.1.38	MM151	<p>Chapter 11 – Housing Provision – Main Modification 151</p> <p>We note the following addition to 11.1.38: 'There may be site specific factors and viability issues which may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3) requirements set out in Policy 11.1(d) for specific developments. The council will have regard to the exceptional circumstances detailed in PPG (Housing for Older and Disabled People); Government Housing: optional technical standards and paragraph 3.7.6 of the London Plan or subsequent updates to these in determining where the application of flexibility is warranted.'</p> <p>We are concerned that 'flexibility' may lead to a dilution of the London Plan's target for at least 10% of new dwellings to meet Building Regulation M4(3) ('wheelchair user dwellings') and all other new dwellings to meet Building Regulation M4(2) ('accessible and adaptable dwellings')1. We hope that the Council will have a high threshold for meeting the 'exceptional circumstances' laid out in 3.7.6. of the London Plan2</p>	<p>No change proposed. The proposed main modification ensures that the Plan is not only consistent with the London Plan but also with national policy concerning this matter.</p>
210	64		Merton Centre for Independent Living	12 Places and Spaces	D12.1 Delivering well designed and resilient neighbourhoods		MM197	<p>We welcome the addition of the following to 12.1.3, which concerns the 'Principles of good urban design': 'Development in the borough must consider all sections of the community, in particular disabled people. An inclusive environment is one which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people as set out in the chapter Health and Wellbeing.'</p>	<p>Support welcomed.</p>
211	64		Merton Centre for Independent Living	16 Sustainable Travel	T16.4 Parking and low emission vehicles	Part d	MM340	<p>Chapter 16 – Sustainable Travel – Main Modification 340</p> <p>In d of T.16.4 'Parking and Low Emissions Vehicles', we note the insertion of 'where possible' after 'Disabled persons' parking should be ... accommodated within the development site'. We are concerned that this may lead to Disabled people's parking spaces being too far away to be of any use.</p> <p>That said, we are pleased that 16.4.7 states: 'It is essential that disabled parking facilities are fully accommodated on site wherever possible and should be incorporated within the overall design at feasibility stage. Disabled parking provision should be designed in accordance with recognised design standards to be conveniently located, provide adequate access space and be provided in accordance with requirements and design standards set out in London Plan Policies T6, T6.1, T6.5. In exceptional circumstances, where the developer has justified why it is not feasible to provide some or all the disabled parking for the development on site, consideration may be given to accommodating disabled parking on the public highway, subject to an appropriate financial contribution to facilitate this.' We hope that the Council will have a high threshold for meeting 'exceptional circumstances'.</p>	<p>No change proposed. Paragraph 16.4.7 sets out that there must be exceptional circumstances to justify why a development can't contain all disabled parking on site ; this may arise for small sites with limited dwellings.</p>
212	64		Merton Centre for Independent Living	General comment - Whole Plan				<p>Additional Observation</p> <p>The draft Local Plan makes numerous references to increasing 'walking and cycling'. We suggest that the phrase is amended to 'walking, wheeling and cycling', as this would recognise the essential use of mobility equipment, including self-propelled wheelchairs, powered wheelchairs (sometimes referred to as powerchairs), and mobility scooters.</p>	<p>Amendment proposed throughout the Local Plan to change walking and cycling to "walking, <b>wheeling</b> and cycling" and to amend the Glossary as follows <b>Wheeling (as in walking, wheeling and cycling)</b> <b>An equivalent to walking; the action of moving at walking speed using any kind of aid to mobility such as wheelchairs, pushchairs, mobility scooters etc</b></p>
213	64		Merton Conservative Group	04 Mitcham	Mi16 Mitcham Gasworks		MM62	<p>Mitcham – is a local town centre and should not have dense development or overdevelopment. The Mitcham Gas Works site though brownfield should be sympathetic in size and scale, and no higher than any other building in Mitcham (i.e. max limit of six storeys).</p>	<p>No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a>) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a></p>
214	64		Merton Conservative Group	05 Morden	N5.1 Morden and Mo1 Morden Regeneration Zone			<p>Morden – council and TfL land can be used for reasonable development, respecting the adjoining suburban nature of the low-level residential areas.</p>	<p>No change proposed.</p> <p>Both the council and TfL's land is within proposed site allocation Mo1 'Morden Regeneration Zone' and the wording in para 5.1.34 and the site allocation refer to the avoidance of "inappropriate abrupt transitions of building heights". Furthermore, in para 5.1.34 it is stated that: "The scale of existing buildings within the suburban Morden Neighbourhood, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties", and in part 5 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone', it states that: "The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter."</p>
215	64		Merton Conservative Group	General comment - Whole Plan				<p>Merton Conservatives remain deeply concerned by the detail of Merton's Local Plan as this is a fundamentally flawed document that does not address the need for sustainable growth in the borough. This plan has been rushed through following the delayed realisation by the Labour administration that the Labour Mayor of London had increased the borough's housing target to such an extent that Merton was unable to demonstrate a five-year housing land supply. This meant that we have been unable to prevent predatory development applications such as the Redrow application on the Tesco's site on Burlington Road.</p> <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 their needs. After 14 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. Sadly, this plan will lead to further parts of the borough being concreted over by developers when we should be focusing on developing brownfield sites which are plentiful in Merton.</p>	<p>No change proposed. The Plan has been in preparation for 6 years including more than nine months of public consultation so has not been rushed through. National government policy requires Local Plans to identify and meet housing needs within their local area. Please see the Planning Inspectors submitted documents INSP26 Written Ministerial Statement "Long term plan for housing" <a href="https://questions-statements.parliament.uk/written-statements/detail/2023-12-19/hcws161">https://questions-statements.parliament.uk/written-statements/detail/2023-12-19/hcws161</a> and INSP27 Housebuilding in London, letter from the Secretary of State to the Mayor of London which both emphasise national government's requirements on local authorities to support housebuilding.</p>

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216	64		Merton Conservative Group	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	Colliers Wood – any new building must be lower and stepped down significantly than the tallest existing building – Britannia Point	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
217	64		Merton Conservative Group	09 Wimbledon	N9.1 Wimbledon			We oppose any building of towers in Wimbledon Town Centre, and no building should be taller than six storeys. That the definition of the town centre should be minimised and reduced from what is proposed, to respect the fact that residential areas directly abut the town centre location. The long-term policy to build another bridge over the railway (to the north of the Wimbledon Quarter, linking Queens Road with Alexandra Road), is to be reinstated. The removal of 'public open space via public realm improvement' should also be reinserted as the public in Wimbledon have long called for a better public open space in Wimbledon town centre.	No change proposed. Buildings in Wimbledon town centre are already taller than six storeys. Wimbledon town centre boundary is the same in the existing Local Plan as the new Local Plan and reference is made to the town centre being tightly bound by attractive residential streets so the town centre can't expand.
218	64		Merton Conservative Group	09 Wimbledon	N9.1 Wimbledon			The long-term policy to build another bridge over the railway (to the north of the Wimbledon Quarter, linking Queens Road with Alexandra Road), is to be reinstated.	No change proposed. The aspiration to build another bridge to the north of the town centre has been removed as there is no evidence to support that government funding will be available for such a substantial project within the 15-year lifetime of this Local Plan (either via Crossrail2 or another government source)
219	64		Merton Conservative Group	09 Wimbledon	N9.1 Wimbledon			The removal of 'public open space via public realm improvement' should also be reinserted as the public in Wimbledon have long called for a better public open space in Wimbledon town centre.	No change proposed. Policy N9.1 Wimbledon already references streetscene improvements and public realm enhancements appropriate to this major town centre location c. <i>Enhancing the experience for people coming to Wimbledon commensurate to its international reputation by requiring exemplary design and landscaping, street scene and public realm investment, taking the Healthy Streets Approach including opportunities to green Wimbledon</i> and at (f) ... <i>Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.</i>
220	64		Merton Conservative Group	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	We do not support the building or concreting over off MOL and such land should be protected for public use within the Local Plan. In particular we reject the suggested new policy N8.1 as it is unsound and wrong to tie it to the AELTC application. We therefore call on the council to start listening to local residents. It's not too late to produce a Local Plan that both protects our borough and provides the homes that people need.	No change proposed. The Local Plan continues to protect Metropolitan Open Land. Policy N8.1 is not unsound.
221	64		Merton Conservative Group	07 South Wimbledon	N7.1 South Wimbledon			South Wimbledon – enhance the public realm and not build any building that are taller than existing buildings, respecting the unique sub town centre location and heritage.	No change proposed; policy N7.1 proposes enhancements to the South Wimbledon local centre
222	65		Merton Cycling Campaign	General comment - Whole Plan		14,121, 202,303	MM6	In addition we want to see reference made to the fact that increased density results in more pedestrian/cycle movements, so clearly the public realm needs to become less dominated by motor vehicles. New residents, who won't own cars, should be able to cycle, which requires quality cycle infrastructure. Pedestrians should be supported with adequate pavement width and crossings that prioritise their journeys. Road danger reduction is key	No change proposed. Strategic Transport policy 16.1 addresses road safety, traffic dominance and active travel
223	65		Merton Cycling Campaign	01c Urban Development vision and objectives	Spatial vision		MM9	The wording "Made progress" has no value in our view. It is not a quantitative target; neither does it describe qualitative changes that are required. We recommend a firm target for carbon emissions reduction (which may be caveated for factors that are not within the Council's control). Other targets may also be acceptable, but they need to be specific and measurable	No change proposed. The council's target for the borough is Net Zero by 2050 as set out in the council's 2020 Climate Strategy and Action Plan. This is outside the lifetime of this local plan and the Local Plan isn't the only mechanism to help deliver it. Progress to deliver the action plan towards making progress to the 2050 target can be found in the annual climate delivery plans on the council's website which set out what progress has been made towards specific targets in previous years and what is being planned for forthcoming years. Please see <a href="https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change/strategy">https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change/strategy</a>
224	65		Merton Cycling Campaign	03 Colliers Wood	CW1 Baltic Close	Design and accessibility guidance	MM35	This seems vague and under-ambitious. The wording "there is a lack of space on the public highway to facilitate additional cycle parking" has a baked-in assumption that all the highway space currently used for motor vehicle movement and parking (and there is a lot of it) will continue to be so used. Such an assumption does not belong in this document. Wording such as "Consideration should be Given" pretty much guarantees that it won't happen: we prefer a much clearer duty to provide cycle parking. If cycle parking isn't increased very significantly then requirements elsewhere in the document to increase cycling become unachievable	No change proposed. MM35 relates to site CW1 Baltic Close in Colliers Wood, a very small site of 0.02ha just off the A24. The A24 road includes the Cycle Superhighway C7 at this point; bus lanes and single lane traffic for vehicles in each direction. At this location there is no car parking on the public highway. Within 20metres of the site, outside Colliers Wood underground station, there is a large amount of cycle parking which is very well used. It remains the case that there is a lack of space on the public highway at this location to facilitate additional cycle parking, hence the Local Plan proposes that it should be considered for this site.
225	65		Merton Cycling Campaign	03 Colliers Wood	CW2 Britannia Point land south of	Design and accessibility guidance	MM40,	These are largely duplicates of MM35 and would best be references to avoid confusion.	No change proposed. MM35 relates to Site CW1 Baltic Close, a very small site owned by Transport for London. MM40 relates to Site CW2 and South of Britannia Point, a larger privately owned site. MM49 relates to Site CW4 Colliers Wood Station and surrounding commercial development The issue of demand for additional cycle parking in Colliers Wood and a lack of space on the public highway is an issue in this area that is relevant to all site allocations.
226	65		Merton Cycling Campaign	03 Colliers Wood	CW4 Colliers Wood Station	Design and accessibility guidance	MM49	These are largely duplicates of MM35 and would best be references to avoid confusion.	No change proposed. MM35 relates to Site CW1 Baltic Close, a very small site owned by Transport for London. MM40 relates to Site CW2 and South of Britannia Point, a larger privately owned site. MM49 relates to Site CW4 Colliers Wood Station and surrounding commercial development The issue of demand for additional cycle parking in Colliers Wood and a lack of space on the public highway is an issue in this area that is relevant to all site allocations.
227	65		Merton Cycling Campaign	07 South Wimbledon	N7.1 South Wimbledon	Part k	MM106	The "reason" includes the statement that " <i>opportunities to promote walking, cycling and public transport are identified and pursued</i> " This area and the junction is highly polluted (one of London's pollution hotspots) and hostile for cycling and walking. The benefits of this scheme must include addressing the dominance of motor traffic, prioritising of cycling and walkin, and reduction in pollution. Just providing cycle parking and a public space isn't enough. The word "encouraging" we feel is too vague. Again, there's a baked in assumption here that "busy main roads" are an immutable feature of this location. This assumption is not compatible with promoting walking/cycling or indeed public transport - we note that buses are often held up at this location due to the constant congestion and inadequate bus priority measures.	No change proposed. MM106 relates to heritage assets in policy N7.1 South Wimbledon. This policy has a number of points relating to travel which promote cycling and walking and help address traffic congestion including (i) <i>Support improvements to the transport infrastructure that will help to reduce road congestion and improve the public realm, particularly for pedestrians and cyclists;</i>
228	65		Merton Cycling Campaign	09 Wimbledon	N9.1 Wimbledon	Part j	MM108	The Plan should not only ensure improvements to public transport, but also to cycle provision which is notably lacking in central Wimbledon, which is dominated (as noted in this same section) by motor traffic. The gyratory system is particularly disadvantageous for cyclists, forcing longer journeys and raising road danger.	No change proposed. The previous clause in policy N9.1 addresses cycling and cycle safety i. <i>Improving health and wellbeing by promoting walking and cycling: making the Town Centre more attractive, greener, safer, easier to get around for pedestrians and cyclists.</i>
229	65		Merton Cycling Campaign	14 Infrastructure	IN14.1 Infrastructure		MM287	We recommend this be changed to "public transport and active travel (cycling and walking) improvements" This also applies to MM287. [officer note - other reference is to MM146]	No change proposed. Reference is to the London Plan 2021.

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230	65		Merton Cycling Campaign	11 Housing	H11.5 Student Housing, other housing with shared facilities such as HMOs and bedsits	new para below 11.5.6	MM180	The wording implies that only sites with existing good PTAL/walking/cycling infra are appropriate for student accommodation. A key goal of the Plan must be to raise standards of PTAL/walking/cycling infra, indeed this is specified by MM329 and Policy IN 14.1, so the wording here is not consistent with that policy. We suggest that the wording be changed to include wording such as: "The council shall ensure that sites selected for student accommodation are served by good, safe walking and cycling infrastructure and public transport, by improving the infrastructure as needed, in alignment with the Cycling, Walking and Kerbside Strategy (and/or other future relevant documents that may be issued)."	Amendment proposed. Having carefully considered the proposed suggestions the following amendments are proposed to MM174 and MM180 to ensure clarity and effectiveness of the Plan as follows :  MM174 xii. provides high quality <u>walking, cycling and</u> cycle parking facilities-;  MM180 <b><u>We consider the most appropriate sites for student accommodation proposals to be well connected locations with good levels of access to public transport (PTAL 4 or higher) including those supported by good walking and cycling infrastructure and where student residents have access to a wide range of services and facilities within a 15-minute walking distance. Such proposals are also supported where the development is capable of having good access to public transport, cycle and pedestrian networks and facilities as a result of proposed transport and infrastructure improvements and make suitable contributions towards improving these networks where required. Proposals will be required to meet the requirements of all relevant local plan policies including Policy T16.2 (Prioritising active travel choices) and Policy IN 14.1 (Infrastructure). It is considered that applicants should give priority during the site selection process to locations in proximity to the institutions that the development will serve.</u></b>
231	65		Merton Cycling Campaign	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	New para below 12.3.6	MM222	Note that LTN 1/20 also applies. There may also be additional standards and guidance that are introduced during the lifetime of the Plan so we recommend that the wording reflects that the cycle infrastructure (and the public realm in general) be designed in accordance with best-practice and with the latest standards and guidance, to ensure the longest design life/avoid future rework. See also MM325.	Amendment proposed to MM222 (second paragraph) to read " <u>Cycle infrastructure should be well designed and integrated into buildings or the public realm in accordance with best practice and the latest standards and guidance available during the lifetime of this plan. As at 2024 guidance includes TfL's London Cycle Design Standards and LTN1/20 Cycle Infrastructure Design.</u> "
232	65		Merton Cycling Campaign	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	New para below 12.3.6	MM222	Communal amenity often has a "movement" function: permeability is important so that pedestrians and cyclists have direct routes out of a development, and are not forced to use busy roads, indirect routes or to go round 3 sides of a development to gain access.	Amendment proposed to MM222 (third paragraph) to ensure design and location of communal amenity space considers access as per the representation " <u>Communal amenity should be multifunctional: designed for playing, socialising and relaxing and if outdoors, be green and biodiverse. It should provide sufficient space to meet the requirements of the number of residents and be inviting and easily accessible for its intended users</u> ".... etc
233	65		Merton Cycling Campaign	15 Green and Blue Infrastructure	O15.6 Wandle Valley Regional Park	Part d and para 15.6.10	MM298	The wording "fully accessible to all users, at all times of the year." sets a high bar. While improvements have been made recently to install sealed surfaces there are still sections that do not have smooth sealed surfaces (particularly in Ravensbury Park and further south), and there is a lack of lighting on all sections south of Merton High Street. Smooth sealed surfaces are important to avoid excluding disabled users, especially in winter when the path becomes wet and muddy, and lighting is important particularly for women and others who may not feel safe in a dark environment. If the Plan is not going to address these issues then the path won't be fully accessible, and in that case an alternative, fully-accessible route should be provided	No change proposed. Paragraph 15.6.10 starts with a point of fact that echos the representation: that while some sections of the Wandle Trail are in a good condition, there are some sections that will require future investment and improvement to enable a continuous trail that is fully accessible to all users at all times of year.
234	65		Merton Cycling Campaign	16 Sustainable Travel	T16.1 Sustainable travel	Part e	MM323	The term "road danger reduction" is preferred over "road safety" as the latter implies casualty-count reduction, which can result in exclusion of vulnerable road users from areas, rather than actually reducing danger. The "road safety" approach leads to excessive use of guard rail, underpasses/overpasses, indirect pedestrian/cycle routes, rather than addressing the causes of danger. (The term is also used elsewhere in the doc.)	No change proposed. Highway safety, safety of road users, sense of safety are all terms that are found in the NPPF and the London Plan and their use is not considered to result in poor urban, street or public realm design.
235	65		Merton Cycling Campaign	16 Sustainable Travel	T16.2 Prioritising active travel choices	16.2.4	MM328	The statement that cycling provision is "not of adequate standard in all areas" is misleading because the standard is generally inadequate and not up to LTN 1/20 or LCDS standards (with a few exceptions). We find it odd that "severance created by busy roads" is the only barrier to cycling that is called out here. Of far greater significance are the lack of continuous, safe cycle routes, the dominance of motor traffic in many residential areas, the lack of segregated tracks on main roads, and the lack of a continuous network. A huge barrier to the use of routes across parks and open spaces (and also elsewhere) is the presence of chicane barriers, which make cycling slow on standard cycles, and impossible on non-standard cycles in many cases. Such barriers are not Equality Act-compliant and exclude many disabled users. Merton has an unusually high density of such barriers compared with other boroughs. We feel these points should be specifically mentioned, because they are major impediments to active travel choices and must be addressed. We should not mislead on the amount of work the Council needs to do to raise the level of cycling provision to an acceptable standard.	Amendment proposed to MM328 remove dates for walking and cycling council support as this is likely to happen on more than one occasion throughout the 15-year lifetime of the Local Plan.
236	65		Merton Cycling Campaign	16 Sustainable Travel	T16.2 Prioritising active travel choices	16.2.6	MM330	The issue is not only access, but permeability. We would like to see a specific requirement for permeability for active travel i.e. cycles and pedestrians should be able to travel through a development at all times.	No change proposed. Policies in the Local Plan require access and permeability however it is not intended to establish a requirement for pedestrians and cyclists from outside a development to be able to travel through all developments at all times.
237	65		Merton Cycling Campaign	16 Sustainable Travel	T16.1 Sustainable travel	Part B		Note that private electric vehicles are not sustainable for a number of reasons so don't belong in "sustainable transport" but it appears that in the Plan there is indeed a separate section for EVs. The absolute number of EVs can't be the only indicator: we need both a target to increase the percentage of registered vehicles that are pure EV and a target to reduce the total number of registered vehicles. Also note that not all EVs are the same. A large SUV is more damaging than a small car.	No change proposed; the council is developing an electric vehicle, walking and cycling strategy where the details of electric vehicles can be considered
238	65		Merton Cycling Campaign	General comment - Whole Plan				We note that the history of this new Local Plan goes back to 2019, and there are certainly various respects in which the plan is already out-of-date. We think the approach of a "grand plan" is the wrong one for the current era; there is so much continuous change going on in various aspects - public policy, climate change, technology - that any plan will be out-of-date before it's published, especially if it takes 5 years (and counting) to get it over the line. For example, electric bikes and scooters hardly existed for most practical purposes in 2019; now Lime bikes are everywhere, as are delivery e-bikes.  We suggest that a more "agile" approach is needed, where policies are added and adjusted in response to real-world developments. We understand that developers and other interested parties need some stable point of reference and that compliance with moving targets is difficult, but at the same time we cannot represent the real policy environment as static, and to do so risks outcomes that are less and less aligned with current reality as time passes.	No change proposed. Policy T16.2 references mobility hire services (e.g. e-bikes, e-scooters) and para 16.2.12 states " <i>Mobility hire services are becoming more mainstream and include dockless electric bikes and electric scooters. These innovative services have the potential to provide a cost-effective, sustainable and convenient way of getting around as an alternative to car and public transport use. We support these services where they are appropriately licenced and accredited through nationally recognised organisations, ensure safety for users and other road users and do not undermine take up of active travel. To accommodate these services, we will seek to provide designated parking locations and may require appropriate developments to provide suitable space for this purpose, particularly in town centres where trip generation is likely to be high and alternative available highways space is limited.</i> "
239	66		Merton Friends of the Earth	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	Merton Friends of the Earth are writing to object proposed amendments to the site brief for CW2, the car park adjacent to Britannia Point – specifically, Major Modifications MM39 and MM 42.  Merton Friends of the Earth are a Friends of the Earth local community group, made up of volunteers campaigning for a greener and fairer in Merton.  We believe that allowing the modification to go ahead would cause serious harm to the local environment, air quality, public health, biodiversity, and the natural heritage; and it would impede local efforts to tackle climate change.  We wish to take this opportunity to express our full support for the detailed objections and their summary prepared by the Colliers Wood Residents Association, including proposal for new modification, which we have attached to this email.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.

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240	67		Merton Liberal Democrats	04 Mitcham	Mi16 Mitcham Gasworks		MM62	We note that proposals to reduce height limits on this site to nine stories did not have the support of the inspectorate. Proposals for ten stories on the site should be stepped up and consider the views of existing residents in the adjacent development. Mitcham Gasworks will form an important part of Merton's future housing mix and additional transport connections to the site should be encouraged. Any new developments throughout Mitcham should follow a design-led approach as in new Policy 12.3. They should have regard to paragraph z where it states that single aspect homes are strongly discouraged.	Support welcomed for developments having a design led approach with good transport connection and discouraging single aspect homes
241	67		Merton Liberal Democrats	05 Morden	N5.1 Morden			In Policy N5.1 at paragraph e, it is unfortunate that the line 'Tall buildings should be located appropriately' has been removed. Many residents would feel that the Civic centre at 58m should act as a pinnacle building, but it does not form part of the Morden regeneration zone and the large site allocation Mo1. Merton Park residents are being asked to accept a 39m height limit for much of the town centre. The strategic heights diagram for Morden does, as listed at 5.1.34, instead mark a new pinnacle with up to 71m at Morden Underground station which maximises the delivery of housing. We support the point in this paragraph that such building heights will need to be justified in accordance with policies D12.3, D12.5 and D12.6 'Tall Buildings'. It is unclear if design codes limit height or just design, but a Morden Regeneration design code should be a priority for Merton.	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Supported by studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2) and the Morden Town Centre Visual Impact Assessment (5D3), earlier versions of the draft local plan have not included references to the Morden Civic Centre building as being a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone. The proposal that the Morden Civic Centre building should be a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone, had been raised in a number of representations, at various consultation stages for the draft local plan. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text for the tall buildings cluster within the Strategic Heights Diagram for the Morden Regeneration Zone, now states that it is an indicative location for a "...tall building cluster where buildings of circa 71m could be appropriate, ..." and paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone states that design-led height parameters should be informed by a design guide or design code. It is clear from the National Model Design Code that 'height' can be included in design codes.
242	67		Merton Liberal Democrats	05 Morden	Mo6 York Close car park			We support development of site Mo6, York Rd car park whilst retaining parking for residents in adjacent properties. Emphasis should be given to the addition in paragraph 5 which requires proposals to improve access to publicly accessible space. An opportunity exists for public realm improvements around the site.	Support welcomed
243	67		Merton Liberal Democrats	05 Morden				On Morden Park, the 2020 Green and Blue Infrastructure Study recommends that the Site of Importance for Nature Conservation be extended to include the whole of the eastern portion of the park, which we fully support. The park is identified as having value for its contribution to biodiversity and ecological resilience. Whilst it may be dismissed as 'neutral grassland', it is a mix of grasses with intrinsic value for wildlife, particularly butterflies.	Support welcomed
244	67		Merton Liberal Democrats	06 Raynes Park	RP7 Rainbow Estate			It is right that in the Design and Accessibility guidance for site RP7 at page 252 that there is a change from 'implemented' to 'commenced' especially regarding the kiss and ride for Raynes Park station. In 2018, we said, 'The station should be enabled to become the proud heart of the Local Centre' and since then it has become clear that work here has stalled.	Support welcomed
245	67		Merton Liberal Democrats	06 Raynes Park	RP3 Burlington Road	P239		Site RP3 (page 239), namely the Tesco development, has had access to the Pyl Brook area added at paragraph 5 and is now under construction having been granted permission at appeal. Residents in West Barnes have been asked to accept 52m tall buildings on the site despite this not being within the designated Opportunity Area. We would like to see the latter part of the paragraph realised where it aims to 'provide public access for pedestrians and cyclists' to Pyl Brook.	Support welcomed for the provision of access for pedestrians and cyclists to Pyl Brook, which could be secured by this policy from future development.
246	67		Merton Liberal Democrats	06 Raynes Park	N6.1 Raynes Park			In Policy N6.1, we understand reference to Wimbledon Chase has only been removed because it has been moved to the Wimbledon chapter. We are happy to see Raynes Park step-free explicitly added to paragraph I.	Support welcomed.
247	67		Merton Liberal Democrats	07 South Wimbledon	N7.1 South Wimbledon			In our 2018 consultation response we said, 'We would like to see site allocation Wi8 as part of a larger plan for South Wimbledon, rather than a tack on to the Wimbledon Policy'. We are therefore pleased to see South Wimbledon has its own chapter and its own neighbourhood (encompassing all of Abbey ward). Whilst mostly impacted by a separate policy on Merton's estates, we hope to see resources put into the whole ward without limiting this to High Path. This would prevent any areas in between from being left behind.	Support welcomed.
248	67		Merton Liberal Democrats	09 Wimbledon	D12.6, N9.1, Wi9, Wi10, Wi13			Of much interest to residents will be Policy D12.6 on 'Tall buildings' - This should be read in conjunction with the Strategic Heights Diagram for Wimbledon Town Centre, copied here: [officer note - please see original response for image] We would ask for clarity please to the yellow and red dotted lines on indicative heights. We do not support Paragraph 5.3.60 of the Future Wimbledon Supplementary Planning Document, which allows for buildings to be higher than those specified in the Document and feel that the Local Plan is an opportunity to remedy this. If 40m buildings are to be constructed in Wimbledon Town Centre, the dotted indicative location lines should be contained within the black line boundary, and these should end at Francis Grove rather than extending to residential Tabor Grove as they do in the image above. The potential for 48m tall buildings, (marked with the red dashed line) should also not be permitted to extend beyond this location. We are also of the opinion that the limitation on tall buildings should be rigorously applied by the planning authority. It is acknowledged that Wimbledon is a large part of Merton's Opportunity Area and that a plan is already published for 40m buildings in the area covered by site allocations Wi9, Wi10 and Wi13. But these should be design-led and not height-led and would be best served by feedback from Merton's Design Review Panel. Buildings which abut residential areas should not exceed the height in the plan for Wimbledon town centre which is suggested to be 24m (subject to all other policy requirements). We encourage the production of a local Design Guide or Design Code as soon as possible, as well as potentially a Tall Buildings SPD. We agree with paragraph 3.26 on tall buildings within the EIA attached to the local plan which highlights the importance of 'appropriate stepping up of storey heights in the environs of both the boundaries of the areas where tall buildings are considered suitable and adjacent to identified clusters, to avoid abrupt transitions.'	Amendment proposed to the indicative strategic heights diagram for Wimbledon to align with the policy as written for Wimbledon town centre. The Strategic Heights Diagram supports buildings with a range of height commensurate to existing Wimbledon town centre building heights and on consideration of character and appearance, having regard to the Future Wimbledon SPD.
249	80		Parkside Residents Association	09 Wimbledon	N9.1 Wimbledon		AM158	In Policy N9.1 we note at page 289 that references to both Hartfield Rd and Broadway East in respect to taller buildings have been removed from paragraph e. Both references return though at 9.1.8 on page 293. Whilst we agree that any pinnacle building should be focussed around the station site, we welcome news that a proofreader will be looking at the plan with a view to finding inconsistencies like this.	Amendment proposed to delete 9.1.8. Views through the Town Centre and beyond from Wimbledon Hill will be respected, with taller developments set away from the historic core, located at the station, St-George's Road and Broadway East to align with AM158
250	67		Merton Liberal Democrats	09 Wimbledon	N9.1 Wimbledon	9.1.33		9.1.33 We feel that Wimbledon Chase has been added to this neighbourhood as an afterthought as in a previous draft it was in the neighbourhood of Raynes Park. We feel that it not being listed as its own distinct area has led to a confused approach to planning. We do question how the environmental improvements mentioned on page 297 can progress with a recently approved development for the station site. This may in fact limit 'provision of better facilities for buses, pedestrians and cyclists, with planting to improve the quality of the environment' as it takes space away for each of these things. It also does not directly provide step-free access at Wimbledon Chase. Residents tell us they care about building heights, and this Local Plan should provide clear guidance on appropriate heights, and protection in areas not identified as appropriate for tall buildings. This includes Wimbledon Chase. The question residents will ask is if the plan will make it harder to approve buildings contrary to policy. The answer is that developers can continue to submit plans at any height and committee can continue to use its judgement on what comes before them subject to planning rules. We would recommend though that members refer to the local plan for guidance in this area once it has been adopted. Neighbourhood parades are not Town or District Centres.	No change proposed. Policy D12.9 provides the Local Plan approach to building heights.
251	67		Merton Liberal Democrats	09 Wimbledon	Wi7 Rufus Business Centre, Ravensbury Terrace			Environmental improvements should continue to be sought even after planning permission is granted, and we support the following addition to paragraph 2 in the infrastructure requirements for site Wi7 (Rufus business centre): '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.'	Support welcomed.

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252	67		Merton Liberal Democrats	10 Health and Wellbeing	HW10.2 Delivering Healthy Places	10.1.27, 10.1.31, 10.2.3		<p>We are glad to see, on Page 348, that mental health is now considered in the header alongside the rest of health and integrated care.</p> <p>10.1.27 It is good when considering dementia friendly design that neurodiversity and those with sensory impairments have been added to this paragraph about inclusive neighbourhoods.</p> <p>10.1.31 Officers, Design Review Panelists and DPAC members will appreciate the addition of an expectation to demonstrate the incorporation of dementia-friendly approaches to planning applications, and we support this addition. It would be good to see detail published on what is expected in this regard.</p> <p>Policy HW10.2 Paragraph d – The changes in this paragraph make it a lot less liberal, and we prefer the initial drafting. An outright ban on hot food takeaways does not take into account circumstances where a school is situated within 400 metres of a high street or neighbourhood parade, and where a blanket ban on hot food takeaways may therefore detract from access to amenities and undermine the viability of the shopping parade. 'Manage and monitor' would be better than 'not permit' and we would agree with businesses operating in compliance with the Healthier Catering Commitment standard. With these food options often being more affordable, the key is education and encouragement to eat healthily. 'Not normally permit' in Policy TC13.8 paragraph g is more acceptable.</p> <p>10.2.3 This presents the same problem but requires revision as it states Merton will not permit new hot food takeaways but then states 'The council will have regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of hot food takeaway outlets and healthy eating initiatives taking place at the school.' The quoted part of the paragraph, we support.</p> <p>On page 361 with the new heading Indices of Multiple Deprivation, we believe that listing 10 out of 20 wards is exclusionary. A suggestion at DPAC was that another ward was added, but we would support a revision that removes any ward by name. Instead of 'However, there are pocket of deprivation across Merton with more in the east (wards Abbey, Colliers Wood, Cricket Green, Graveney, Lavender Fields, Longthornton, Lower Morden, Pollards Hill, Ravensbury and St Helier) of the borough', we would suggest 'However, there are pockets of deprivation across Merton.' We do not support any local initiatives that exclude applicants by post code or presume there is little deprivation in wards which are not mentioned in this new paragraph. Lower-layer Super Output Area data does not always reflect what is happening at an individual property level.</p>	Support welcomed
253	67		Merton Liberal Democrats	11 Housing	H11.1 Housing Choice	11.1.15, 11.1.20, 11.1.18, 11.6.6		<p>We are glad that our consultation response from six years ago has been considered when we wrote 'We feel that small site developments should continue to provide affordable homes. Over 90% of the planning applications Merton receives for new homes are for sites providing less than 10 homes'. This is a sentiment reiterated at 11.1.15 in this plan.</p> <p>We additionally stated, 'We would go further, and require that 50% of the housing it builds each year must be affordable housing.' Now 50% is the figure reflected in this local plan, so we are in support of that change.</p> <p>Another commendable change is the proposed requirement for a 20% financial contribution for affordable housing when developing small sites of 9 or fewer dwellings. It is often difficult to attract interest from housing associations where the site is small. It is therefore good if this money could be used to add affordable housing to other developments where a delivery partner has already been identified.</p> <p>11.1.20 We support the commitment to publish guidance to assist in the delivery of the affordable housing requirements for small sites, explaining how the viability assessments will be carried out.</p> <p>11.1.18 We note the new addition of this paragraph which states that priority be given to affordable housing if other policies need to be reduced to compensate for costs when viability is on the margins. Whilst affordable housing is one of the most important policy areas, this paragraph should not be used to ignore other policy areas as standard. For example, the Wimbledon Chase neighbourhood parade is not designated for tall buildings, and yet one was given permission by members in 2023 as the planning application was amended to include a small amount of affordable housing (after initially being proposed without any). Unfortunately, there is no guarantee that the developer will be able to find a delivery partner, and residents are left with the worst of all worlds – a building that is inconsistent with local planning rules on heights and density and that does not contain an affordable housing element. The local authority should not be afraid to ask developers to return with a viable scheme when options are presented that require moving away from agreed policy.</p> <p>11.6.6 We support this change to the Local Plan which now considers updates to legislation and London policy regarding traveller sites to 'ensure that any extra provision meets their needs and takes account of the size of the site and the needs and demographics of the families resident on them.'</p>	Support welcomed.
254	67		Merton Liberal Democrats	12 Places and Spaces	D12.2 urban design	Policy D12.2 Paragraph b –	MM202	<p>Policy D12.2 Paragraph b – This seems to be an unnecessary deletion and we should all strive that 'urban layouts are permeable to cyclists and pedestrians'. Then in paragraph s, we agree this addition which suggests consideration of designing out crime, anti-terrorism, dementia friendliness, green and blue infrastructure and flood risk at the earliest stage of planning the public realm.</p>	No change proposed. This is deleted as national policy (NPPF para 16) requires no unnecessary repetition and the issue is already contained in the Local Plan at D12.3 and in the sustainable transport policies
255	67		Merton Liberal Democrats	12 Places and Spaces	D12.2 urban design	12.2.11		<p>12.2.11 It is right that a section on protecting the public realm during development work has been added and that expenses can be recovered from the landowner where it is damaged and then in need of repair. Our group agrees that 'The long-term maintenance and management of public realm should be considered from the start of the design process.'</p>	Support welcomed.
256	67		Merton Liberal Democrats	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	12.3.1		<p>12.3.1 We support the addition of information here encouraging the use of Design Access Statements. The section on 3D renders is also welcome as these have made a substantial difference in deciding applications at DPAC either as a substitute for or in addition to a site visit.</p>	Support welcomed.
257	67		Merton Liberal Democrats	12 Places and Spaces	D12.5 managing heritage assets	12.5.14		<p>12.5.14 It is good to see better language surrounding heritage assets and climate change. It is important to have policies in areas like solar panels on roofs. Retrofitting should also be supported where it does not cause harm to its setting.</p>	Support welcomed.
258	67		Merton Liberal Democrats	12 Places and Spaces	D12.9 Shop front design and signage	D12.9 Urban design, Paragraph d) ii 12.2.11, 12.3.1, 12.5.14		<p>Policy D12.9 Paragraph d) ii – Whilst security screens should be installed on the inside of shopfront windows to deter graffiti and enhance the streetscape, it is right that the line has been added 'unless it can be demonstrated for specific security reasons.' They will continue to not be permitted on the outside of a shop front, but this gives enforcement the ability to make exceptions where required.</p>	Support welcomed.
259	67		Merton Liberal Democrats	13 Economy	TC13.5 Merton's town centres and neighbourhood parades	Table 13.5a Merton's town centre designation		<p>Whilst existing betting shops are unaffected, we support Policy TC13.5, Paragraph B) iii insofar as betting shops will no longer be considered appropriate new uses within the primary shopping area. Problem gambling is outside the scope of this plan, but part of the response should include not opening new premises in our Major and District Town Centres.</p> <p>Table 13.5a: Merton's town centre designations As this is new, we support Wimbledon being listed as the only Major Town Centre and think Colliers Wood, Mitcham and Morden are appropriate for designation as District Town Centres. Tall buildings will not be appropriate in Local Town Centres outside of site allocations.</p>	Support welcomed
260	67		Merton Liberal Democrats	14 Infrastructure	IN14.1 Infrastructure	14.1.3		<p>Policy IN 14.1 We support this addition on viability assessments for affordable housing, especially late stage review. We agree that infrastructure should be completed prior to occupation.</p> <p>14.1.3 It is right that local development funds infrastructure improvements. An addition in this paragraph outlines recourse to seek payments from applicants for the cost of viability assessments. The developer should indeed be required to demonstrate what can viably be achieved.</p>	Support welcomed
261	67		Merton Liberal Democrats	15 Green and Blue Infrastructure	W16 Centre Court Shopping Centre, The Broadway	15.6.10		<p>We support the update to the Wandle Trail paragraph (15.6.10) within the Green &amp; Blue Infrastructure chapter which now includes the word 'protection'. We are also keen to emphasise the importance of last mile distribution to help with Merton's congestion and air quality concerns and applaud the addition of this use to site allocation W16(Wimbledon Quarter).</p>	Support welcomed
262			Merton Liberal Democrats	15 Green and Blue Infrastructure	O15.1 Open space, green infrastructure and nature conservation			<p>15.6.10The Wandle Trail is on the path to completion, and we are glad to see the currently inaccessible section from Trewint Street to Ravensbury Terrace added specifically by inspectors. It is good to see that Section 106 contributions are in place and that access has already been secured through some development sites. This project should not be allowed to stall due to delays in the adoption of this plan.</p>	Support welcomed. S106 contributions have been secured to investigate the feasibility of the Missing Link project at the Wandle Trail at Earlsfield and this is not tied to the adoption of this Local Plan. Securing the "missing link" in Merton's (and Wandsworth's) local plans shows co-operation between the two boroughs on planning matters and facilitates a route to secure planning contributions towards the Trail's construction, should this be feasible.

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263			Merton Liberal Democrats	15 Green and Blue Infrastructure	O15.1 Open space, green infrastructure and nature conservation			Strategic Policy O15.1 The correction of 'green spaces' to 'Open Spaces' protects biodiversity but realises the importance of connectivity via walking and cycling both to and through these spaces. We would encourage that the borough's Walking & Cycling strategy is published and its recommendations implemented in time for the adoption of the local plan.	O15.1 - Merton's Walking and cycling strategy is underway independently of the Local Plan.
264			Merton Liberal Democrats	15 Green and Blue Infrastructure	O15.2 open space and green infrastructure	15.2.16, 15.2.17		15.2.16 The addition of hedges to important green infrastructure is supported by our group. 15.2.17 Community orchards should be an ambition for all wards within London Borough of Merton and we agree with the adding of orchards to this paragraph to support community cohesion and to offer food growing opportunities.	Support welcomed
265			Merton Liberal Democrats	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	Paragraph D		O15.3 – Paragraph D: Whilst a national requirement, it is good that this paragraph is updated to lock in 10% of Biodiversity Net gain in planning applications. Merton's Biodiversity Net Gain Group should have its membership reviewed every year to ensure that it contains officers with the correct and most up to date environmental expertise with which to contribute to strategy. It is right in this new addition that when it comes to removing trees 'The benefits of the development' will need to 'outweigh the amenity value of any features that would be lost.' It achieves a financial contribution to secure 'appropriate' replacement trees, and this is welcomed, but should still be second in preference to the retention or replacement of trees onsite.	Support welcomed
266			Merton Liberal Democrats	15 Green and Blue Infrastructure	O15.4 Protection of Trees, Hedges and Other Landscape Features	15.4.10		15.4.10 We support the stronger language with the change from 'minimise impacts' to 'protect and retain' when it comes to existing trees. It is only right that developments within proximity of existing trees are required to provide protection from any damage during development.	Support welcomed
267			Merton Liberal Democrats	15 Green and Blue Infrastructure	F15.8 managing local flooding	15.8.16		15.8.16 In the Basement and subterranean Supplementary Planning Document, the addition of ii is good in that it protects neighbouring property. The basement should not result in an increased risk of flooding to other locations.	Support welcomed
268			Merton Liberal Democrats	15 Green and Blue Infrastructure	F15.9 Sustainable drainage systems	Paragraph D		Policy F15.9 Paragraph d – In many of our wards, we have seen front gardens paved over for parking spaces, so we support this change to require green spaces where possible. Soft landscaping should be retained rather than losing all the permeable surfaces.	Support welcomed
269	67		Merton Liberal Democrats	15 Green and Blue Infrastructure	P15.10 air quality, pollution and land stability			Policy 15.10 There have been recent occurrences of plant use (such as heat pumps) causing neighbourhood disputes. The addition of the following to paragraph b is welcomed: 'The design and layout of new development must endeavour to minimise conflict between different land uses, taking account of users and occupiers of new and existing developments.' We agree that there should be 'no detrimental impacts on living conditions, health and wellbeing or local amenity.'	Support welcomed
270	67		Merton Liberal Democrats	16 Sustainable Travel	T16.1 Sustainable travel	Para d Para e 16.2.4 16.2.12 16.4.5 16.5.16		Policy T16.1 Paragraph e – We should seek to reduce traffic dominance in our borough. This new paragraph encourages the management of vehicle use to minimise impact on the network. 16.2.4 We agree with this new entry that cycle and pedestrian provision in Merton is not of adequate standard in all areas. When barriers to cycling and pedestrian journeys are discovered, they take too long to remedy. This must be a priority moving forward. 16.2.12 It is hoped that designated parking locations for cycle hire schemes like Lime and Forest might expedite the rollout of parking bays which did not accompany the borough-wide rollout of the cycle hire schemes. Policy T16.4 Paragraph d – It is good that disabled spaces will include electric charge points and be accommodated within the development site where possible. But is it right that 16.4.5 be removed in its entirety? Not objecting to the conversion of front gardens to parking is a policy that could serve Merton well to encourage electric vehicle car use. This should be considered alongside the provision of streetlamp charging points and cable gullies that run from residence to road. We would encourage 16.4.5 not being deleted, so it can be followed where appropriate and where permeable materials are used. We direct attention to the recommendations of Merton's Electric Vehicle Charging Task Group. 16.5.16 We are concerned that this paragraph is not adequately replaced. Some cycle routes require significant development but now the paragraph is struck out. 'Where the proposed cycle network includes pedestrian links where cycling is currently prohibited and cyclists are required to dismount, we will assess whether the route can be enhanced to safely accommodate cyclists including consideration of a "share with care" approach where separate facilities are not feasible.' This is particularly obvious outside Raynes Park station where the cycleway that runs from New Malden comes to an abrupt end.	Support welcomed.
271	67		Merton Liberal Democrats	17 Monitoring Framework	M17.1 Monitoring		MM350	The new tall buildings policy does not replace an old one directly because, put simply, Merton has not had a policy on tall buildings and now relies on D12, plus a range of impending design guides and design codes per each site allocation. As these could be prepared either by applicants or the council, we suggest that the preparation of these be a priority for the coming municipal year. We welcome many areas of the local plan, subject to the representations made above, and look forward to the publication of the more specific guides and codes that the plan calls for	Support welcomed.
272	67		Merton Liberal Democrats	General comment - Whole Plan				Please find below the response of Merton Liberal Democrats to the 2024 consultation. All bold headings refer to the sections and Policies in the Plan, and numbers in italics thereunder correspond with the numbered policies and/or paragraphs where relevant. We thank officers for their hard work over several years bringing Merton's Local plan to this stage as it gets close to adoption. Whilst a legal requirement, there has been a long delay in getting to this stage and it is clear the borough requires this process to reach its conclusion. Adoption of the new Local Plan should offer a 'go-to' for residents, developers, and members to understand the aims and ambitions for development within Merton. Whilst our response mainly has regard to modifications since the last consultation, it should be read in conjunction with our responses on Stage 1 in 2017, our Stage 2 response in 2018, and to Stage 2a in 2021.	Support welcomed.
273			Merton Liberal Democrats	08 Wimbledon Park	N8.1 Wimbledon Park			We welcome the removal of the old golf course site from the W13 site allocation that encompasses AELTC. The recent planning application has received significant local objection and this change to the site allocation removes those areas from consideration as part of the site. We do understand though that inspectors have asked for a policy on the Registered Park and Garden opposite, and the result is new policy N8.1. It should be noted that this is a new policy, and there has not been consultation in previous stages – Additional weight should therefore be given to representations received pertaining to this chapter (we note particularly detailed comments from the Wimbledon Park Residents Association and the Wimbledon Society, which need to be fully considered as part of this process). The accompanying Equality Impact Assessment states that the policy will only cover the part of the green space within Merton and that a large part of the site is in Wandsworth.	Support welcomed.
274			Merton Liberal Democrats	08 Wimbledon Park	N8.1 Wimbledon Park			Whilst some parts of the chapter come from the original site allocation, we feel it is drafted in a way that attempts to be 'all things to all people'. By starting the chapter with 'We will do this by supporting development proposals that...', it frames everything that follows in a way that accepts the premise that the site should be developed in the first place. With the new policy only covering the geographical area outlined in red below, this is not the position of many residents or local groups: [image of Wimbledon Park policy map]	No change proposed. National policy requires plans to be positively prepared and a Local Plan will only be engaged if development is taking place.
275			Merton Liberal Democrats	08 Wimbledon Park	N8.1 Wimbledon Park			This is most obvious when approaching paragraph g: 'Consider the removal of insensitive tree and other non-native planting, particularly on the former golf course and around the athletics track.' This line seems to reference proposals from existing planning applications that frame the trees being removed as a positive thing, for example to remove previously marked fairways - It is our position that this will facilitate overdevelopment of the site and many residents will not support this.	No change proposed. The proposal to remove insensitive trees and other non native planting arises from evidence including the Wimbledon North (Wimbledon Park) Conservation Area Character Appraisal 2006 which states on page 45 "Issues relating to the historic character of the Park Landscape - conifer screening and mature Lombardy Poplars to perimeter of athletics compound dominate park landscape... Insensitive tree and other planting on golf course" On the same page it also says that the same athletics track trees and the insensitive tree planting on the golf course obstruct the historic views across the lake
276	67		Merton Liberal Democrats	08 Wimbledon Park	N8.1 Wimbledon Park		MM115	The area marked out in red above includes three different owners and despite what is written on the page, the reality on the ground is that anglers are having issues with getting access to the shoreline to clear detritus. Within site allocation W13 for AELTC (page 308), as the boundary has changed, reference should not now be made to the lake. Whilst the lake remains in the ownership of London Borough of Merton with these changes, we would want this to continue to be the case to ensure that residents retain access. We support the addition of the final paragraph: 8.1.30. 'Given the size of this historic asset and its London location, the lake shoreline currently has very limited public access. We will work with all landowners to improve public access around the whole lake, taking into account biodiversity habitats, sporting, safety and reservoir management considerations.' As mentioned above, access to the lake should not be used as a 'trade off' for otherwise inappropriate development. We also note that access to the lake by means of a walkway around its entirety is currently required under the terms of the covenant agreed by the AELTC when they bought the golf course land and effective from when it ceased to be used as such.	Amendment proposed. MM115 proposes to delete the reference to Wimbledon Park Lake in the Site W13 site allocation.

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277	67		Merton Liberal Democrats	01a Introduction				This section shows the level of engagement at consultation stages during the formation of the plan. It neglects to note that this is the first time members of the public have been invited to comment on the new policy for Wimbledon Park. We continue to encourage engagement with ward councillors and residents during pre-app and throughout consideration of individual proposals. In our 2017 response we stated 'Currently the role of the public in Merton seems very limited. The development of the new local plan is an opportunity to change this.' Unfortunately, we do not see that the new Local Plan will address any new ways for residents to be involved in engagement around individual planning decisions, particularly at a pre-application stage. We encourage inspectors to consider resident feedback on site allocations and the neighbourhoods in which they live during this final stage.	No change proposed. Merton's Statement of Community Involvement (SCI) sets out how the council will involve local people, local businesses, other key organisations and stakeholders when preparing planning policies documents (for example Local Plans) and on submitted planning applications. All local planning authorities (the council) are required under section 18 (1) of the Planning and Compulsory Purchase Act 2004 to prepare and maintain a SCI.
278	67		Merton Liberal Democrats	General comment - Whole Plan				1.2.10 - 'effective master planning and/or Neighbourhood Plans will be essential for future growth in Merton' Whilst the Future Wimbledon Supplementary Planning Document (SPD) provides some guidance on building heights in a part of the borough (although with discretion remaining with DPAC), we think it is important that the Design Guides/Codes called for in all site allocations that point to tall buildings are produced as soon as possible; equally we think there is a strong argument for a new SPD on tall buildings. These documents should be ready for adoption at the same time as the local plan for effective master planning.	No change proposed; no amendment to main modifications proposed in this part of the representation.
279	67		Merton Liberal Democrats	General comment - Whole Plan				1.2.17 We support the change from 'Residents suffering from poor health in Merton are concentrated in our most deprived wards' to 'tend to be'. There are 20 wards in Merton and listing ten wards specifically (as in this paragraph), runs the risk of ignoring those struggling who can be located all throughout the borough.	Paragraph 1.2.17 amended to amend wording to "tend to be"
280	67		Merton Liberal Democrats	01b Good Growth				1.2.43 Density and mixed uses – We support the idea that this paragraph highlights that once the new local plan is adopted that tall buildings should be deemed to be appropriate only in those locations identified within the plan. As mentioned above, we do feel there should be clear guidance on tall buildings whether site specific, or more generally (or both). 1.2.54 We support the adding of social uses to Mitcham regeneration plans which include new homes, employment, and community use.	Support welcomed
281	67		Merton Liberal Democrats	01c Urban Development vision and objectives	Spatial vision			Spatial Vision After recent attempts to build on the borough's MOL and in registered parks, we welcome this new addition on page 35: 'Protected and improved access to the borough's Metropolitan Open Land (MOL), parks and open spaces, and have protected and enhanced biodiversity and areas of nature conservation'. We feel very strongly however, that 'access' to some open space should not be the 'price' for allowing development on otherwise protected open space.	The council welcome the support and note comment made regarding access to some open space.
282	67		Merton Liberal Democrats	02 Climate change	CC2.1 Promoting sustainable design to mitigate and adapt to climate change	2.1.11		2.1.11 We support the minimum of 12,084 additional homes to be built during the plan period as stated here, however planning approvals are not habitable homes and the Council should do all it can to get these projects delivered. We note that over the period of the last 20 years, only around 66% of homes with planning permission have been built. We would encourage that the Small Sites Toolkit be updated to assist with Merton's multiple small sites and infill development.	Support welcomed.
283	67		Merton Liberal Democrats	02 Climate change	CC2.4 Low carbon energy	2.4.3		2.4.3 With 98% of homes in Merton using gas, we would suggest prioritisation of low carbon gas initiatives like the use of hydrogen or biomethane. The local impacts of a ban on gas before these changes are in place will place a significant burden on the less affluent and the vulnerable and localized support may be required. 2.4.14 With heat pumps already being a large part of the movement toward net-zero carbon by 2050, we support the need to ensure living conditions of existing and future occupiers of any proposed development are not materially harmed by heat pumps. These should always be located and installed in a neighbourly fashion, with resulting noise and vibrations taken into account.	No change proposed. Introducing low carbon gas initiatives to power homes, business and other buildings would require governmental support.
284	67		Merton Liberal Democrats	02 Climate change	CC2.4 Low carbon energy	2.4.14		2.4.14 With heat pumps already being a large part of the movement toward net-zero carbon by 2050, we support the need to ensure living conditions of existing and future occupiers of any proposed development are not materially harmed by heat pumps. These should always be located and installed in a neighbourly fashion, with resulting noise and vibrations taken into account.	Support welcomed. In addition Policy 15.10 Air quality, pollution and land stability includes protection for existing noise-sensitive situations including para 15.10.20 If a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity be designed to protect existing users or residents from noise impacts"
285	67		Merton Liberal Democrats	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	3.1.12 We are broadly in support of the Merton Opportunity Area which does not limit house building to one location within the borough, with an aim to producing 5,000 homes in total including 2,000 in Morden and 2,000 in South Wimbledon. 3.1.18 Colliers Wood has a high PTAL rating and is a suitable location for further housing. We support the striking out of Colliers Wood town centre from uniformly being considered suitable for tall buildings. CW2 (Britannia Point car park) is a sensible site allocation, along with the lower building heights proposed at site CW5 (Priory Retail Park). We would support Britannia Point remaining the pinnacle of any cluster of buildings at these combined locations. We would point to reference in the site allocation which mentions the 15-storey limit from the Merton Character Study. The site should retain the necessary safe-guarded space for any future Colliers Wood-Sutton tram link. Our general comments on tall buildings are also relevant here.	Support welcomed.
286	68		Merton Park Ward Residents Association	01b Good Growth		1.2.3 / p.10		(1) "Creating liveable attractive and safe places for people to live, study, work and visit. ...."These principles and objectives are at odds with a town centre dominated by tower blocks at its core and their inherent adverse impact on human scale and interaction at street level.	Support welcomed.
287	68		Merton Park Ward Residents Association	01b Good Growth	D12.6 Tall buildings	1.2.43 / p.17		(2) "In accordance with the London Plan 2021... Tall buildings are one form of high-density development that can be appropriate ..... subject to exemplary design ... and impact on existing character, heritage and townscape."  The extent of intensification (see also Comment number 12) is wholly inappropriate for a suburban town characterised by low rise housing, human scale developments and close proximity and access to Metropolitan Open Land.	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1) have been published as part of the examination library. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text within the Strategic Heights Diagram for the Morden Regeneration Zone have been amended to refer to 'appropriate' heights and in paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone, it states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code. It is pointed out in the 'Impacts a designated open space' part of the site allocation for the Morden Regeneration Zone that the site is adjacent to Metropolitan Open Land. The details within a design guide or a design code and development proposals, will therefore be assessed against policy Policy O15.2 'Open Space and Green Infrastructure' and part-k of policy D12.2: "Positively contribute to the amenity of designated open space or Metropolitan Open Land that is in close proximity, if applicable."



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288	68		Merton Park Ward Residents Association	01c Urban Development vision and objectives		4 b / p.33		(3) "all development is supported by necessary infrastructure ... benefits for local and surrounding communities"see later observations	No change proposed. Part 2 in 'Infrastructure Requirements', within the 'Morden Regeneration Zone' site allocation, states: "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." The draft local plan contains policies such as, Policies HW10.1 'Health (including mental health) and Wellbeing', HW10.2: 'Delivering healthy places', 14.1 'Infrastructure' and IN14.2 'Social and Community Infrastructure', which requires the assessment of any impacts that development proposals will have on health infrastructure and the mitigation of these impacts. The delivery of health related infrastructure will be delivered in collaboration with the local Health and Wellbeing Board and NHS Property Services.
289	68		Merton Park Ward Residents Association	01c Urban Development vision and objectives		p.35		(4) "improved community health and wellbeing" see observations under Comment number 21	No change proposed The response to point 21 is copied below for ease of reference:  No change proposed. Deleted during the Local Plan Examination. The Plan should be read as a whole and the planning system operates alongside other relevant regulations, therefore it is unnecessary to duplicate in the Plan.
290	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	p.178		(5) "Improving public space - prioritise pedestrians and cyclists ..." see later observations	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1) have been published as part of the examination library. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text within the Strategic Heights Diagram for the Morden Regeneration Zone have been amended to refer to 'appropriate' heights and in paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone, it states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code.
291	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	part e / p.183		(6) " <del>located appropriately and relate well to surrounding context</del> " see observations under Comment numbers 2,12,15	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1) have been published as part of the examination library. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text within the Strategic Heights Diagram for the Morden Regeneration Zone have been amended to refer to 'appropriate' heights and in paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone, it states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code.
292	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.1 - 5.1.3 / p.184		(7) this deleted section should be reinstated so that its context is better understood in relation to future planning	No change proposed. This background text is not necessary to make the draft local plan 'sound' and its deletion makes the supporting text more concise.
293	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.4 / p.185		(8) "opportunity to create new character areas and features ...." but this must be respectful of its very close proximity to the adjacent low rise residential housing.	No change proposed. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). The concerns raised will be addressed by the following references within the draft local plan: - both paragraph 5.1.34 and part 4 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone' refer to the avoidance of abrupt transitions of building heights. - paragraph 5.1.34: "The scale of existing buildings within the suburban Morden Neighbourhood, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties." - part 5 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone': "The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter."

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294	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.14 / p.186		(9) "optimising intensification"  it is perhaps a more palatable description but nevertheless it is actually intensification by another name - see later comments	No change proposed. The modification is necessary to improve clarity and consistency with the use of similar wording to that in London Plan policies SD6, D1 D3 and H1.
295	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.17 / p.187		(10) "...appropriate protection against decline ..."  there needs to be provision for aging local long-term residents who (due to mobility issues) wish to remain in familiar local settings close to amenities but move from family houses to more compact accommodation, and through this release housing for families. The condition of housing stock in elderly occupation invariably declines as the ability and finances to undertake routine maintenance also diminishes.	No change proposed. This paragraph is not necessary to ensure that the draft local plan is 'sound' and it is proposed to be deleted to avoid unnecessary duplication of matters that are adequately addressed in other Local Plan policies and to make the supporting text more concise.
296	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.49 / p.194		(11) "The surrounding Morden neighbourhood"  it is difficult to see how the immediately adjacent low density suburban character can be "respected" if it is to be overshadowed by tower blocks of 13-22 storey tower blocks. See also later comments.	No change proposed. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). The concerns raised will be addressed by the following references within the draft local plan: - both paragraph 5.1.34 and part 4 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone' refer to the avoidance of abrupt transitions of building heights. - paragraph 5.1.34: "The scale of existing buildings within the suburban Morden Neighbourhood, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties." - part 5 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone': "The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter."
297	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.56 - 5.1.64 / p.195 - 196		(12) "Delivering the Morden Regeneration Zone (Site Mo1)"  The need for some regeneration of the town centre is accepted, but not at any cost. As proposed, there is a real risk that the core positive attributes and intrinsic character that exist to make Merton Park, and this area of Morden, so attractive to residents, will be wholly undermined by this overbearing intensification of Morden Town Centre, whose tower blocks will dominate the skyline, create lakes of shading and loss of natural light to surrounding homes. The intensification of Morden town centre at the proposed level of high density conflicts with its own Policy 12.1.1 where the council states that the "... character, distinctiveness and viability of a successful area often is in the quality of its built environment and public realm ..... to help deliver principles of good design .... Merton Council has produced a variety of SPD..." The proposal to develop the core centre with tower blocks does not bode well in terms of building character, and high quality public realm.	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1) have been published as part of the examination library. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text within the Strategic Heights Diagram for the Morden Regeneration Zone have been amended to refer to 'appropriate' heights and in paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone, it states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code.
298	68		Merton Park Ward Residents Association	05 Morden	N5.1 Morden	5.1.63 / p.196		(13) 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.  Many members of this Association have lived in the plan area for many decades. They each have years of lived experience of accessing medical and allied services in the Morden area. The services are at breaking point now. Making provision for "additional health infrastructure to meet local needs" should be the precursor to any redevelopment and prioritised now, not contingent upon it. To plan for 2,000 or so additional homes within the town centre alone (say 4,000 additional people) simply cannot be sustained.	No change proposed. Part 2 in 'Infrastructure Requirements', within the 'Morden Regeneration Zone' site allocation, states: "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." The draft local plan contains policies such as, Policies HW10.1 'Health (including mental health) and Wellbeing', HW10.2: 'Delivering healthy places', 14.1 'Infrastructure' and IN14.2 'Social and Community Infrastructure', which requires the assessment of any impacts that development proposals will have on health infrastructure and the mitigation of these impacts. The delivery of health related infrastructure will be delivered in collaboration with the local Health and Wellbeing Board and NHS Property Services.
299	68		Merton Park Ward Residents Association	05 Morden	Mo1 Morden Regeneration Zone	p.207		(14) Map  The northernmost finger of land currently occupied by Kenley Road Car Park is in the heart of low rise traditional semi detached and terraced housing and, but for its narrow accessway from Kenley Road, would otherwise be an entirely separate parcel of land. Its close juxtaposition to neighbouring residential housing, and abutting the open space of Kendor Gardens, renders it worthy of a separate definition under "Site allocation" in order to protect the amenities of the neighbouring occupiers from overlooking and intensive future uses.	No change proposed. Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). The concerns raised will be addressed by the following references within the draft local plan: - both paragraph 5.1.34 and part 4 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone' refer to the avoidance of abrupt transitions of building heights. - paragraph 5.1.34: "The scale of existing buildings within the suburban Morden Neighbourhood, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties." - part 5 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone': "The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter."

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300	68		Merton Park Ward Residents Association	05 Morden	Mo1 Morden Regeneration Zone	1.c. / p.208		<p>(15) "Transforming the appearance, and user experience and air quality of Morden Town Centre by relocating the bus stands outside the Morden underground station away from their current location and creating to help create healthier streets and a welcoming public space outside the Morden underground station entrance."</p> <p>Relocation as a bus stand accommodating numerous buses is to be welcomed but for those travellers with reduced mobility, a safe and level access route is essential. We agree with relocation of the bus stands, but provision should be made to ensure that bus stops are within ready and level reach of the underground station entrance.</p>	<p>No change proposed.</p> <p>These changes seek the relocation of the bus stands and the accessibility of bus stops will be secured via part-c of policy T16.5 'Supporting transport infrastructure':</p> <p>"Redevelopment of existing public transport sites must demonstrate how services and access for all users will be protected and improved through the provision of new or upgraded facilities and adequately maintained during the construction phase of development."</p>
301	68		Merton Park Ward Residents Association	05 Morden	Mo1 Morden Regeneration Zone	Site Location / p.210		<p>(16) Strategic Height Design</p> <p>The indicative plan shows a Tall Buildings (tower blocks) cluster in the central part of Morden town centre. Research and experience clearly demonstrates that high rise flats and the potentially hostile environments they create at street level are inappropriate uses within a suburban location such as this. Policies already noted in the Local Plan seek to require buildings to be easily and readily maintained, which is unlikely to be the case with tower blocks. Regrettably it seems that policies to protect scale and appropriateness-to-setting have been abandoned.</p>	<p>No change proposed.</p> <p>Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library).</p>
302	68		Merton Park Ward Residents Association	05 Morden	Mo5 Morden Road Clinic	p.213		<p>(17) Infrastructure requirements</p> <p>Protection against over high development on this site, and especially its sensitive edges, needs to be afforded to the low rise traditional housing immediately adjacent to this site.</p>	<p>No change proposed.</p> <p>This site is not identified as being suitable for tall buildings and is not within the Morden Town Centre boundary.</p> <p>Within part-I of policy N5.1 'Morden' it states that within the surrounding Morden Neighbourhood, in which this site is located, the local plan will "Ensure that development conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure".</p> <p>The following policies will also be applicable:</p> <p>Policy D12.2 part-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."</p> <p>Policy D12.3 part-a: "Take a design-led approach that responds positively to the sites context and character."</p> <p>Policy D12.3 part-c: "Enhance local distinctiveness by responding positively to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area."</p>
303	68		Merton Park Ward Residents Association	05 Morden	Mo1 Morden Regeneration Zone			<p>We enclose a schedule of our findings all of which we feel require further attention. There is one matter that we have discussed with Future Merton colleagues over many years that we now cover under Comment 14 on the map of Mo1. It seemed understood that a building height of four stories with a fifth in a mansard roof is as high as should be considered for the Kenley Road Car Park in order for it to relate in scale to the adjacent Daybrook Road and other surrounding streets. The inclusion of that Car Park in the Morden Regeneration Zone would surely tempt developers to think that something much higher is now acceptable. Kenley Road Car Park should be treated as a separate site. Any green link of Kendor Gardens to the Town Centre can be treated as a separate matter. Our Comment 17 regarding over high development at Morden Road Clinic also relates directly to Daybrook Road.</p>	<p>No change proposed.</p> <p>Matters regarding the Morden Regeneration Zone site allocation and the tall buildings within it, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4 and 8 within the Exam Library). The concerns raised will be addressed by the following references within the draft local plan:</p> <ul style="list-style-type: none"> <li>- both paragraph 5.1.34 and part 4 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone' refer to the avoidance of abrupt transitions of building heights and to be informed by a design guide or design code.</li> <li>- paragraph 5.1.34: "The scale of existing buildings within the suburban Morden Neighbourhood, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties."</li> <li>- part 5 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone': "The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter."</li> </ul>
304	68		Merton Park Ward Residents Association	11 Housing	H11.2 Housing provision	H11.1(d) / p.363		<p>(18) "Provide step-free accessible and adapted housing in accordance with London Plan Policy D7"</p> <p>See also observations under Item 10 We agree there is a need for adapted housing in close proximity to the town centre.</p>	<p>No change proposed.</p> <p>The Local Plan needs to be read as a whole. In addition to Policy H11.1(d) there is Policy H11.4 which sets out the requirements that proposals for supported care housing for vulnerable people needs to meet to be considered suitable. This includes the need for such proposals to be in close proximity to public transport facilities and the convenience of the sites' location in relation to local shops, services and community facilities. Supporting paragraph 11.4.7 states that: "Town or local centres may also provide suitable opportunities for provision, given the proximity of such locations to good public transport and local amenities, but this needs to be balanced against other relevant suitability factors e.g. noise."</p>
305	68		Merton Park Ward Residents Association	11 Housing	H11.2 Housing provision	11.1.18 / p.370		<p>(19) "Merton's Local Plan Viability Study (2020) notes that where viability is already on the margins, other policy requirements may need to be reduced to compensate for these costs"</p> <p>There should be no dilution of other policy requirements as a sop to developers seeking mitigation of their obligations under design or planning criteria.</p>	<p>No change proposed.</p> <p>The phrase "other policy requirements may need to be reduced to compensate for these costs" is an extract from Merton's Housing Viability Study 2020, which has been prepared in accordance with the requirements of the NPPF and NPPG. In particular paragraph 34 of the NPPF states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."</p>

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306	68		Merton Park Ward Residents Association	11 Housing	H11.2 Housing provision	11.1.38 / p.375	MM150	(20) "Estate regeneration that involves the loss and replacement of affordable housing should deliver an uplift in the quantity and quality of affordable housing wherever possible."  The phrase "... wherever possible" should be deleted to prevent net loss of essential affordable housing.	Amendment is proposed to MM150 to further improve clarity and consistency with the London Plan as this phrase is consistent with that set out in supporting paragraph 4.8.5 of the London Plan: <b>Estate regeneration that involves the loss and replacement of affordable housing should comply with the requirements of Policy H8 (Loss of existing housing and estate redevelopment) of the London Plan, including delivering an uplift in the quantity and quality of 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. In accordance with London Plan Policy H8 demolition of affordable housing as part of Estates regeneration must be replaced by an equivalent amount of existing affordable housing floorspace. Existing affordable housing floorspace includes both occupied and vacant floorspace regardless of the current condition of the stock. More information and guidance can also be found in the Mayor's Good Practice Guide to Estate Regeneration</b>
307	68		Merton Park Ward Residents Association	11 Housing	H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.	11.4 a vii / p.390	MM173	(21) "The quality of accommodation complies with all relevant standards for that use."  This strikethrough should be reinstated	No change proposed. Deleted during the Local Plan Examination. The Plan should be read as a whole and the planning system operates alongside other relevant regulations, therefore it is unnecessary to duplicate in the Plan.
308	68		Merton Park Ward Residents Association	12 Places and Spaces	D12.1 Delivering well designed and resilient neighbourhoods	12.1.3 / p.408		(22) "Development in the borough must consider all sections of the community, in particular disabled people. An inclusive environment is one, which can be used safely, easily and with dignity by all. It is convenient and welcoming with no disabling barriers, and provides independent access without added undue effort, separation or special treatment for any group of people as set out in the chapter Health and Wellbeing."  Intensification at the degree implied by the Tall Buildings policy and the town centre core tower blocks is at odds with this policy. Mental health and general wellbeing will be adversely impacted through the loss of skyline, natural light, overshadowing, wind tunnels and sense of overbearing "imprisonment" at street level as a result of inhuman scale of the development.	No change proposed. Policies HW1, HW2 D1 to D6 set out extensive urban design and layout parameters for all developments.
309	68		Merton Park Ward Residents Association	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	D12.3 f / p.418	MM213	(23) "Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens "  This strikethrough must be reinstated. Adequate levels of natural light and sunlight are a core factors in maintaining good mental health and wellbeing generally. The council's own policies elsewhere in the Local Plan endorse the vital need for amenity space, the natural environment and privacy. The deletion of these protections conflicts with its own policies and provides a route for unneighbourly intensification to the detriment of the existing homeowners.	No change proposed. National policy (NPPF para 16) prevents unnecessary repetition in local plans and the issue of acceptable light and privacy levels for existing and future residents and requiring a high standard of amenity for the development and its surroundings is also addressed in the same policy, point (g).
310	68		Merton Park Ward Residents Association	12 Places and Spaces	D12.4 Alterations and extensions to existing buildings	D12.4 b, e, f, h, j / p.429	MM225	(24) "b. Respect and complement the design and detailing of the original building; e. Respect space between buildings where the rhythm contributes to the character f. Complement the character and appearance of the wider setting. h. Where the proposal incorporates a new or altered roof profile, ensure that materials are sympathetic to the original building and the surrounding area. j. Ensure proposals for dormer windows are of a size and design that respect the character and proportions of the original building and surrounding context do not dominate the existing roof profile and are sited away from prominent roof pitches, unless they are a specific feature of the area."  All the deletions should be reinstated to ensure harmony in context and scale within neighbouring settings.	No change proposed. National policy (NPPF para 16) prevents unnecessary repetition in local plans and the deletions are contained elsewhere in the same policy. For example the character and appearance of the wider setting appears in point (e.); the reference to rooflines and dormer windows (deleted F and j) now appears in k
311	68		Merton Park Ward Residents Association	12 Places and Spaces	D12.6 Tall Buildings	p.438	MM225	(25) "They accord to the most up to date and relevant national guidance and London Plan and council policies, guidance and relevant site allocations."  The potential scale, massing, bulk and overbearing intensity arising out of the introduction of tall buildings (and ultra tall tower blocks in the core area) have an adverse and harmful impact, not only on occupiers but also on the occupiers of residential homes in the neighbouring locations. In the race to meet stepped housing targets, little regard appears to be paid to whether such intensive development is "user friendly" "occupier friendly" or contributes to enhancing the inherent character of the surrounding area.	No change proposed as the issues are already contained elsewhere in the Local Plan or are not supported by evidence. MM225 is proposed to ensure consistency with national policy in terms of achieving clarity, avoiding unnecessary repetition, and design and amenity considerations (paragraph 16 and section 12 NPPF).
312	68		Merton Park Ward Residents Association	12 Places and Spaces	D12.6 Tall Buildings	p.441		(26) Strategic Heights Diagram  The introduction of an arbitrary indicative outline where tall buildings of up to 71 m will be permitted should be deleted. It is entirely incompatible in relation to the overall size of the Morden Regeneration Zone, especially given the area's close proximity to the National Trust Park and existing traditional low rise residential housing. To pursue such excessive heights would lead to "Croydonisation" of the town centre and destroy Morden's sense of community and human scale.	No change proposed. The Morden Regeneration Zone is large site (8.4ha), in a highly accessible location (PTAL 6) and can contribute to providing a substantial number of new homes (~2000), including affordable homes, for Merton residents. Supported by studies such as the Morden Strategic Development Framework (5D1), the Morden Heritage Review (5D2), the Morden Town Centre Visual Impact Assessment (5D3) and the Merton Borough Character Study (12D1), earlier versions of the draft local plan have not included references to the Morden Civic Centre building as being a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone. The proposal that the Morden Civic Centre building should be a pinnacle building with regards to the height of the new buildings with the Morden Regeneration Zone, had been raised in a number of representations, at various consultation stages for the draft local plan. Matters regarding the Morden Regeneration Zone site allocation and Infrastructure, were discussed at the Planning Inspectors' public hearings in June 2022 (see Matters 13 and 15 within the Exam Library) and in September 2022 (see Matters 4, 8 and 9 Issue(ii) within the Exam Library). In response to the Inspectors' post hearing letter (INSP22) and clarifications (INSP23), the text for the tall buildings cluster within the Strategic Heights Diagram for the Morden Regeneration Zone, now states that it is an indicative location for a "...tall building cluster where buildings of circa 71m could be appropriate, ..." and paragraph 5.1.34 and the site allocation for the Morden Regeneration Zone states that design-led height parameters should avoid abrupt transitions in building height and be informed by a design guide or design code.
313	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	Mi16 Mitcham Gasworks		MM62	MM62 – We do not support the proposed modification to the site allocation for Mitcham Gasworks. The indicative site capacity should remain as in the submitted plan as 200- 400 homes. It should not be identified as a location suitable for tall buildings. The proposed modification to 500-650 homes up to 11 storeys is the latest in a series of unjustified changes which have been made to this site allocation since the Plan was submitted: • March 2022 – Merton Council modifies the site allocation in the submitted plan to support development of "up to 9 storeys" and consideration of impacts on "existing character, heritage and townscape" was dropped (OD4i). The site capacity of 200-400 homes was unchanged • May 2022 - Merton Council modifies the site allocation again to support "around 650 new homes" "of up to 10 storeys" (LBM05). This was then backed up with a Statement of Common Ground with St William in June 2022 which was prepared in camera and without any other input. The result was a developer-led and not plan-led approach to the future of Mitcham Gasworks • September 2022 - Merton Council modifies the site allocation for the third time in seven months to support a development of "450-650 new homes" "of up to 9 storeys" (LBM15) • February 2024 – Proposed Main Modification (MM62) proposes a fourth change to the site allocation which supports "500-650 new homes" and "an upper limit of around 33m (10 storeys)"	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>

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314	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	Mi16 Mitcham Gasworks		MM62	The Main Modification is justified on the basis of an "initial analysis of the site". Merton Council has confirmed in response to a Freedom of Information request that this "initial analysis" is the LBM19 Mitcham Gasworks Topic Paper provided to the Examination in September 2022. It is a Government requirement that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence" (paragraph 31, NPPF) so they can be justified and found sound by the examination process (paragraph 35, NPPF). It is self-evident this has not been the case with the site allocation for Mitcham Gasworks because: <ul style="list-style-type: none"> <li>• Topic Paper LBM19 on which the site allocation is based is a scant document which offers very limited analysis of the site's capacity. The majority of the document is a description of other evidence (Merton's Borough Character Study) and the pre-application process for a development which has subsequently been confirmed as unsuitable (see below). Topic Paper LBM19 is an entirely unsuitable basis on which to base such a significant decision about a site allocation which would change the entire character of Mitcham</li> <li>• Professional planners in Merton Council and the Inspectors have come to continuously changing and dramatically different conclusions about the capacity of the site and the appropriateness of different heights – this constant change of views with no change of evidence defies credibility and fatally undermines public confidence in the whole process</li> <li>• The unsuitability of the site for tall buildings has been demonstrated in practice via a planning application from a major national housebuilder which sought to construct 595 homes rising to nine storeys. Merton Council has confirmed that "following a detailed review of the proposal, Officers are not satisfied with predominantly, the following:  o Design  o Parking provision and arrangement  o Highways  o General site layout and operational impact when the development is in full occupation  o Quality of accommodation  o Landscaping/Ecology" The failure of an experienced developer to bring forward an adequate scheme in relation to all these issues can be considered to provide significantly more robust evidence than a scant "initial analysis" when deciding what is appropriate for the site allocation</li> </ul>	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
315	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	Mi16 Mitcham Gasworks		MM62	Additionally, there is other contradictory evidence which sits alongside Topic Paper LBM19 and confirms its lack of suitability of Mitcham Gasworks as a location for tall buildings, including: <ul style="list-style-type: none"> <li>• Townscape Analysis – This provides a few poorly executed images for highly selective locations around the site and cannot in all seriousness be considered a robust evidence base. The one image showing the scheme as it appears to those living next to it simply confirms how out of character it will be as an oversized bulk sitting in the heart of Mitcham Village</li> <li>• Borough Character Study – This is a very limited document when it comes to assessing tall buildings for the Local Plan. It considers that the only heritage assets to matter are those which are designated and it uses a misleading "suitability heatmap" (page 139) to justify the selection of locations appropriate for tall buildings. This includes part of Mitcham Gasworks. Yet, the "key site allocations suitable for residential development" in the Local Plan is used as an input to the heatmap.</li> </ul>	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
316	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	Mi16 Mitcham Gasworks		MM62	The result is a circular argument where the evidence used to justify suitable locations for tall buildings in the Local Plan is itself justified by them being identified as suitable in the Local Plan. Take out the site allocations and the Borough Character Study shows the Mitcham Gasworks site as being of only moderate suitability which like so much of the rest of Merton is not appropriate for tall buildings. We welcome the proposed modification to support use of Design Guide or Design Code and especially welcome that this "should be based on effective community engagement and reflect local aspirations for the development of the area". However, this introduces a non-sequitur into the site allocation as a development of up to 650 homes rising to 10 storeys cannot meet local aspirations. There is clear evidence that local aspirations for the site have emphatically rejected this option, including in the Street Audit undertaken of local residents and the views of local ward councillors. The results of the Street Audit could not be more emphatic: The methodology and results of this Street Audit have not been questioned by any representations on the Local Plan or at the Examination. The site impacts on three wards represented by nine ward councillors and other than where they cannot speak publicly about the issue because of their role on the Planning Committee these councillors have all raised objections to the planning application for a more modest scheme than proposed in the modified site allocation. The local MP has also expressed serious reservations. We do not believe it possible to square the circle of Mitcham Gasworks being developed for 650 homes rising to ten storeys in a manner that will "reflect local aspirations". We conclude that the modification to the site allocation policy for Mitcham Gasworks lacks any credible evidence base. The non sequitur between the proposed height/capacity and the need to "reflect local aspirations" also means the site allocation policy is not "clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" as required by national planning policy (paragraph 16, NPPF). We believe the modification results in a policy that is not sound.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
317	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	N4.1 Mitcham		MM54	MM54 – We support the proposed modification. This clarifies the role of Mitcham in the hierarchy established in the London Plan and its role as a District Centre. The change needs to be consistently applied throughout the Plan with the deletion of all references to "Mitcham Town Centre" and associated changes relating to Policy TC13.5 and other Main Modifications, including MM274	Support welcomed.
318	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	Mi5 Land at Canons		MM59	MM59 – The proposed addition misnames the adopted supplementary planning document and should read The Canons Conservation Management Plan. This document was adopted on 18/9/17 and yet still fails to appear on the part of Merton Council's website listing supplementary planning documents.	Amendment made "The Canons Conservation Area Management Plan"
319	69		Mitcham Cricket Green Community & Heritage	04 Mitcham	Mi11 Raleigh Gardens car park		MM61	MM61 – We support the proposed modification, confirming Raleigh Gardens car park is not a suitable location for tall buildings.	Support welcomed.
320	69		Mitcham Cricket Green Community & Heritage	18 Appendices	Metropolitan Open Land - policies Map		MM353	MM353 – We have identified two further clarifications relating to Metropolitan Open Land <ul style="list-style-type: none"> <li>• MOL14 is misnamed as it extends to significant areas outside Mitcham Common, including Mitcham's registered Greens. The description of the physical boundaries to the west is inaccurate with, for example, areas of Metropolitan Open Land west of the A239 at Cranmer Road (extract below)</li> <li>• MOL18 – The Wandle Valley MOL is not located in the Morden neighbourhood area as indicated in the Open Space appendix. As the Site Description now states "The Wandle Valley MOL stretches across a large area of the borough, through the Mitcham, Morden, Colliers Wood and Wimbledon Neighbourhoods"</li> </ul>	Point 1: no change proposed. The name "Mitcham Common MOL" is used for brevity. The site description for Mitcham Common MOL makes it clear that it includes nearby MOL such as Cranmer Green.  Point 2: no change proposed. Each of the nine sections of MOL in Merton has been listed against one neighbourhood in the MOL table on page 710 although the MOL may extend into multiple neighbourhoods. The description of the Wandle Valley MOL is clear that it extends to different neighbourhoods. It was listed against Morden in the MOL table on page 710 as the largest part (Morden Hall Park; Ravensbury Park) is in the Morden neighbourhood.
321	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks		MM62	While we realise that a site allocation is not a planning application, the currently live planning application for this site, and the involvement of Merton Council with the developer (see below), provides useful context for analysing why the proposed site allocation is inappropriate. The evidence of Merton Council's response to the currently live planning application 22/P3620, which is for less than the proposed upper number of dwellings and a lower maximum building height, provides ample confirmation that even this lower, less dense scheme is of unsuitable quality. 5. Planning application 22/P3620, described the proposal as (our bold text): 2 FULL PLANNING APPLICATION FOR THE ERECTION OF NEW BUILDINGS TO PROVIDE RESIDENTIAL ACCOMMODATION (CLASS C3) AND FLEXIBLE COMMERCIAL/COMMUNITY SPACE (CLASS E AND/OR CLASS F2), WITH ASSOCIATED ACCESS, PARKING AND LANDSCAPING ARRANGEMENTS, INCLUDING THE DEMOLITION OF THE EXISTING TELECOMMUNICATIONS MAST AND RE-PROVISION OF NEW TELECOMMUNICATIONS MAST N.B - THE APPLICANT'S PROPOSALS AS CURRENTLY SUBMITTED ARE FOR A SCHEME COMPRISING 595 FLATS IN 6 BLOCKS RANGING BETWEEN 5 AND 9 STOREYS WITH 135 PARKING SPACES, VEHICLE ACCESS FROM WESTERN ROAD AND PORTLAND ROAD AND WITH 363 SQ.M OF FLEXIBLE COMMUNITY/COMMERCIAL FLOORSPACE. 6. We have seen correspondence from a planning officer to Mitcham Cricket Green Community & Heritage dated 13 July 2023, relating to 22/P3620 which states the following (below, our italics). The wide-ranging list of issues of concern, and the implication that those mentioned are just the "predominantly" surfacing issues, clearly, and obviously indicates that the proposal is unfit for the site in fundamental, major respects that are material for a planning decision: Following a detailed review of the proposal, Officers are not satisfied with, predominantly, the following: • Design • Parking provision and arrangement • Highways • General site layout and operational impact when the development is in full occupation • Quality of accommodation • Landscaping/Ecology 7. We should note that 22/P3620 has been submitted by a well known, national homebuilder, St William (part of Berkeley Group), whose work has involved other constrained sites – including former gasworks. They are not inexperienced, yet they have proved woefully incapable of submitting a proposal that is fit for the site. 8. On the basis of the above response from a planning officer to a proposal at a lower height with fewer homes than the modified Site Allocation we fail to see how it is possible for a Site Allocation to increase both height and density and produce development which is fit for purpose and capable of meeting Merton Council's policies. 9. A Statement of Common Ground between Merton Council and St William first published in May 2022 and revised in September 2022, contains no substantive context or justification for a change from 200 – 400 homes to 500 – 650 homes. Is it really possible that Merton Council's initial calculations were so woefully flawed as to justify doubling the lower limit and almost tripling the upper limit of dwellings. This seems unlikely.	No change proposed. The representation relates to a live planning application reference 22/P3620.

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322	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks			10. There has been considerable variance in different versions of the Local Plan submitted and put out for public consultation. To summarise: 3 March 2022. The original site allocation of 200-400 homes remains, but development of up to 9 storeys has been added where no height was previously specified. Notably, the phrase in the section "approach to tall buildings" has had the need to take into consideration "existing character, heritage and townscape" removed. (OD4i). May 2022. The site allocation is modified and now includes the huge jump to "around 650 new homes" while building height jumps to "of up to 10 storeys" (LBM05). Merton Council does not include a range numbers in the homes designation, simply a ball park figure, vaguely described as "around" 650. The publication of a Statement of Common Ground with St William indicates that there was discussion between Merton Council and the developer, but no substance has been released into the public domain that allows us to understand the logic, reasoning or calculations involved in raising the minimum allocation of 200 by 225% and the upper allocation of 400 by 62.5%. Our conclusion is that at this point the site allocation shifted from being plan-led to developer led. September 2022. Yet another change, as Merton Council again modifies the site allocation, this time including a range of "450-650 new homes" "of up to 9 storeys". Now the lower allocation of 450 is 125% higher than the original 200, and the higher allocation 62.5% higher than the original allocation of 400. (LBM15). February 2024. A proposed Main Modification from the Planning Inspector brings yet another rise in proposed density, now with "500-650 new homes" and "an upper limit of around 33m (10 storeys)". The original lower allocation of 200 homes is now up by 150%, and we are back to 10 storeys (MM62).	No change proposed. The proposed site allocation Mi16 for Mitcham Gasworks was discussed at length at the public hearings in June and October 2022. The Planning Inspectors made it clear at the hearings and again in the post hearings letter INSP22 dated April 2023 that they were not persuaded by the council's position on housing supply and (then) maximum building heights. Main Modifications have been proposed to address this issue.
323	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks			11. The only published analysis that we have seen of this site is the Mitcham Gasworks topic paper LBM19 - Mitcham Gasworks Mi16 Topic Paper - September 2022. This paper lacks substantive content. It gives a history of the gasworks site. It makes mention of technical constraints "The applicant has informed the council that the site has significant technical constraints that inform the emerging applications [sic] proposed density which results in buildings over 21m." It is possible to read this as the experienced developer, St William (part of Berkeley Group), coming cap in hand to Merton Council asking for generosity in the site allocation. Is this evidence of developer-led policy making? Later in this Topic Paper the preapplication process with St William is discussed in some detail. Is this further evidence that the Local Plan allocation for this site is developer-led?	No change proposed. LBM19 Mitcham Gasworks topic paper contains sufficient information relative to a site allocation in conjunction with other relevant Local Plan evidence (e.g. Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan.)
324	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks			12. In a Local Plan, Site Allocations should be mindful of how planning applications that come forward can be designed to comply with policies on areas like single aspect homes, biodiversity standards, access to amenity space, quality of homes, design, density and massing. We have seen from 22/P3620 that even an experienced developer can not meet these policies with a proposal that is less dense than the currently proposed Site Allocation. The original allocation of 200 – 400 homes is fit for purpose in this respect.	No change proposed; comments relate to a planning application.
325	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks			13. Planning application 22/P3620 has received hundreds of objections from local people, including a petition signed by more than 660 people. 14. A door to door survey of residents living within 100m of the site (295 people) conducted by local people found 99% rejected plans then in place for a development rising to 10 storeys. The report of that survey is appended to this paper. 15. All councillors in Figges Marsh, Lavender Fields and Cricket Green wards who were at the time not prohibited from commenting by their role on DPAC or as Mayor made representations on 22/P3620. Many of the comments made point out issues which exist as a function of the attempt to overdevelop the site. They could be readily mitigated by a less greedy development, based on the original allocation of 200 – 400 homes. Figges Marsh ward, representation from Cllr Natasha Irons, representing herself and Cllr Agatha Akyigyina (Cllr Aidan Mundy - Chair of DPAC) "...welcome the opportunity for this brownfield site to be developed and to see good quality homes for our community..... However, we have a number of concerns that we feel must be addressed for this scheme to be a success." "current proposals fall short on the allocation of affordable housing" "disappointed that this scheme does not include ANY low-rise family houses" "concerned that so many of the units in the tower blocks are proposed to be single-aspect" "we believe the current proposals are too dense" "the site will be packed in with very little natural light and will do little to improve the visual amenity of the area." Lavender Fields ward representation from Cllr Billy Christie representing himself and Cllr Edith Macauley, Cllr Slawek Szczepanski "No low-rise family homes, and too many single-aspect homes. We support the council's ambition to deliver a diverse mix of housing types. We are therefore disappointed that the development includes only multistorey blocks and no family houses. We are also concerned that so many of the units in the tower blocks are proposed to be single-aspect, and urge the developer to consider re-designing the scheme to significantly reduce the number of singleaspect units." "Access to green space. We believe that there is not enough green space included in the current proposal, and urge the developer to seek creative ways of increasing the amount of green space within the development, to contribute to a proper amenity for future residents." 5 Cricket Green ward representation from Cllr Usaama Kaweesa representing himself (Cllr Michael Butcher- on DPAC, Cllr Gill Manly - Mayor) "With such a large development, and being mindful of the importance of green spaces for the mental health of residents, I would urge the developer to seek creative ways of increasing the amount of green space within the development grounds." 16. This brown field site, on the gateway to Mitcham Village, is appropriate for the new housing development. We support development of between 200 – 400 homes, including family homes	No change proposed. The representation relates to a live planning application.
326	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks		MM62	17. It is imperative the Site Allocation in the Local Plan is set within parameters which allow the Plan's policies to be met. These include, but are not limited to, policies on amenity space, single aspect dwellings, design quality and biodiversity. The density proposed by the Planning Inspector does not provide a Site Allocation for Mitcham Gasworks which is fit for purpose. We have seen that even a less dense proposal from an experienced developer has produced a submitted planning application which planning officers say fails in many key respects. 18. The proposed modifications of building height and site density to site Mi16 should be rejected, and the site allocation should revert to the original indicative site capacity of 200 – 400 homes. In addition the Site Allocation should be clear building height should not exceed 6 storeys	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
327	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks			1. Mitcham Society notes the modifications proposed by the Planning Inspector on the Site Allocation Mi16 Mitcham Gasworks, resulting in a Site Allocation suggesting the site can accept 500 to 650 homes, in buildings up to 10 storeys in height	No change proposed.
328	70		Mitcham Society	04 Mitcham	Mi16 Mitcham Gasworks			2. We ask you to reject these proposed changes, and support development on Mitcham Gasworks that: a. respects the constraints of the site b. does not exacerbate key problems that have been exposed by a currently live planning application for a less dense proposal with lower building height; and c. reflects the importance of this relatively large development site to Mitcham Village in terms of its relationship to the low-rise, characterful vernacular.	No change proposed. The proposed site allocation Mi16 for Mitcham Gasworks was discussed at length at the public hearings in June and October 2022. The Planning Inspectors made it clear at the hearings and again in the post hearings letter INSP22 dated April 2023 that they were not persuaded by the council's position on housing supply and (then) maximum building heights. Main Modifications have been proposed to address this issue.
329	71		Murino. M	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	I am writing as very concerned about the potential option to remove restrictions on the size of the building allowed to be built in Colliers Wood. The construction would be out of character with the rest of neighbourhood, the area is already congested with traffic and the public transport and local facilities already stressed as is. The building of such tall building would have a well a massive impact on the local community during the period of the construction which will be extensive and disruptive. Last but not least a primary school exist just next the current Colliers Wood tower, the noise, disruption, dust and impact on a huge number of children should not be ignored.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
330	72		Natural England	General comment - Whole Plan				No comment.	No change proposed.

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331	73		New.C	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		<p>Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 scheme for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.</p> <p>In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.</p> <p>As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from today with many rundown/derelect buildings/sites around the borough that are not financially viable to regenerate.</p>	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June 2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
332	74		Newsum. A	02 Climate change				Dear Council Local Plan production team Thank you for sharing the proposed changes to the draft local plan. I focused primarily on sections associated with climate action. It is reassuring to see changes proposed strengthen the plan, provides clarity with specific time bound targets.	Support welcomed
333	75		NHS Property Services	04 Mitcham	Mi2: Birches Close, Mitcham, CR4 4LA			<p>The site is allocated for "healthcare with community and enabling residential development or residential if the existing services are relocated within an alternative healthcare facility in Mitcham". The principle of the allocation of the site continues to be supported by NHSPS, and this aligns with NHS and NHSPS's wider estate strategy. However, as raised in our previous consultation responses we continue to oppose the suggested trigger point for the development of the Birches site listed under Part 1 of the Infrastructure Requirements.</p> <p>It is understood that the Council require comfort that the long-term health needs of the local community can be met. However, the NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area.</p> <p>The Birches site is poorly utilised with an inefficient layout, and several buildings have suffered from dilapidation which would require significant investment of public funds to attempt to bring these up to modern standards, which is not considered to represent best value for the health estate.</p> <p>Therefore, works will be taken forward on the Wilson site. Capital receipt from the disposal of the Birches site is necessary to cross fund works at the Wilson site to ensure the long-term health needs of the local community can be met.</p> <p>The proposed allocation as currently worded could give rise to a scenario where health services are relocated out of the Birches site to other facilities and the site would lie dormant, with no development coming forward for a considerable period on the site or at the Wilson site. To ensure the Local Plan is positively prepared and effective, NHSPS are seeking the following modification (shown in italics) to Part 1 of the Infrastructure Requirements listed in this site allocation to enable flexibility on this matter.</p> <p>Proposed Modification to Policy Site Allocation: Site Mi2: Infrastructure requirements</p> <p>1. To ensure that healthcare provision is delivered in this area 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 either the Wilson Hospital or Birches Close sites, unless otherwise agreed between the Council and NHS/NHS Property Services.</p>	No change proposed. The policy position was discussed at the hearings in June and September 2022.
334	76		NHS Property Services	04 Mitcham	Mi18: Wilson Hospital Cranmer Road, Mitcham, CR4 4LD			<p>The site is allocated for "Healthcare with community and enabling residential development. or residential if the existing services are relocated within an alternative healthcare facility in a suitable location in Mitcham". As set out above capital receipt from the disposal of the Birches site is necessary to cross fund works at the Wilson to ensure the long-term health needs of the local community can be met. NHSPS therefore seeks the same modification as requested on the Birches site (shown in italics) to Part 1 of the Infrastructure Requirements listed in the site allocation for the Wilson site.</p> <p>Proposed Modification to Policy Site Allocation: Site Mi18: Infrastructure requirements</p> <p>1. To ensure that healthcare provision is delivered in this area 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 either the Wilson Hospital or Birches Close sites, unless otherwise agreed between the Council and NHS/NHS Property Services.</p>	No change proposed. The policy position was discussed at the hearings in June and September 2022.
335	76		NHS Property Services	10 Health and Wellbeing				The Main Modifications to the policy and supporting text are supported by NHSPS, in particular the acknowledgement of an integrated approach to health and wellbeing being necessary to address health inequalities, recognising the wide-ranging determinants that influence this.	Support welcomed.
336	76		NHS Property Services	10 Health and Wellbeing	HW10.2 Delivering Healthy Places			The Main Modifications to the policy and supporting text are supported by NHSPS. We welcome the requirement in the supporting text for proposed developments within 800 metres of two or more other major developments planned or started to be required to carry out a HIA which considers the cumulative impact, where necessary. We would encourage the Council and applicants to agree the scope of any HIA at pre-application stage, and liaise with relevant NHS bodies to agree the most appropriate means of meeting the relevant healthcare needs arising from a new development as early as possible in the planning process.	Support welcomed.
337	76		NHS Property Services	10 Health and Wellbeing	H11.1 Housing Choice			<p>NHSPS supports the overall principle of this policy to enable delivery of affordable housing across the Borough. We recommend that as part of implementing policy the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> <li>Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners including in the development of any supporting or supplementary guidance on the application of Strategic Policy H11.1.</li> <li>Ensure that the local need for affordable housing for NHS staff is factored into future housing needs assessments, and any other relevant evidence base studies that inform future reviews of the local plan (for example employment or other economic policies).</li> <li>Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.</li> </ul>	No change proposed. The council will continue to engage with stakeholders and partners, including those suggested in the preparation of relevant guidance and evidence base studies as appropriate.

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338	76		NHS Property Services	14 Infrastructure	IN14.1 Infrastructure		MM287	<p>NHSPS acknowledges the modification proposed to Part (a) is seeking to ensure the Plan is justified, effective and in general conformity with the London Plan, however we do not agree that the priority for infrastructure be limited to affordable housing and public transport. Part (a) is clear there is an expectation for "new development to identify, plan for and provide any necessary infrastructure" (our emphasis).</p> <p>Where new developments create a demand for health services that cannot be supported by small incremental extension or internal modification of existing facilities, the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. To be effective, this Policy must require the provision of such appropriate infrastructure where the impact/demand is evidenced as being created by the new development. The appropriate infrastructure in relation to health may include financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these.</p> <p>To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (shown in italics) to Part (a) Draft Strategic Policy IN14.1.</p> <p>Proposed Modification to Part (a) Draft Strategic Policy IN14.1:</p> <p>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. Require new development to comply with London Plan Policy DF1 (Delivery of the Plan and Planning Obligations) which, amongst other things sets out the approach to viability testing, decision making and infrastructure prioritisation (Parts B, C and D) that the Council will take where it has been demonstrated that planning obligations cannot viably be supported. On a site-specific basis this shall include consideration of the Council's published Viability Study, the Mayor's Affordable Housing and Viability SPG and, that priority be given to affordable housing and necessary public transport improvements unless other infrastructure needs are demonstrated by technical assessments submitted with a planning application or infrastructure contributions are requested by statutory consultees or service providers. Where other infrastructure is demonstrated as needed or is requested, it should be prioritised with affordable housing or public transport.</p>	<p>Amendment proposed to MM287 to ensure conformity with both national policy and the London Plan to add to the end of policy IN14.1(a) "On a site-specific basis this shall include consideration of the Council's published Viability Study, the Mayor's Affordable Housing and Viability SPG and that priority be given to affordable housing and necessary public transport improvements <u>where these meet the statutory tests for planning obligations</u>"</p> <p>Also amendment proposed after first sentence of 14.1.3 <u>All planning obligations for any development must meet the three statutory tests set out in Reg 122 of the Community Infrastructure Levy Regulations 2010 as amended.</u></p>
339	76		NHS Property Services	14 Infrastructure	IN14.2 Social and Community Infrastructure			The Main Modifications to the policy and supporting text are welcomed by NHSPS, and the overall wording of this policy is supported.	Support welcomed.
340	77		O'Shea, C	General comment - Whole Plan				<p>A developer recently used a local school as the venue for a so-called 'drop-in session' about a local site, which not one of our local Councillors (including one parliamentary candidate) were in a position to attend as it was scheduled to conflict directly with a full Council meeting. Considering the anti-democratic nature of this opening gambit, I have already advised the developer and its agents of various items of misinformation subsequently put about as fact at this gathering (copying in Merton, naturally), as well as the pretty 'free-wheeling' nature of the 'rambling about the room' that went on, the contradictory and sometimes incoherent nature of verbal and written information and the fact the recording of community concerns was shut down, with devices being powered off (and indeed, packed away) while invaluable 'local knowledge' was still in full flow, and well before the time they'd advertised their session would terminate. All told, a pretty shambolic first performance on the part of the Chartered Surveyor, the Planner and their two comms agency guys. When asked about Building Regs, PW and Rights of Light approaches, there was some insinuation that these very valid and genuine community concerns were somehow 'irrelevant'...? Irrelevant to whom, being the obvious question this begs...? They seemed more interesting in babbling about trellis to older community members than engaging around the fundamentals of quality design and, perhaps even more importantly, quality build?? Community engagement levels in Ireland are such that I was genuinely shocked - where I come from, this kind of slapdash approach would be seen as doing nothing but getting people's back up.</p>	No change proposed; comments relate to a planning application.
341	77		O'Shea, C	General comment - Whole Plan				<p>They've apparently entered into conditional contract with the owners, subject to planning permission for somewhere between 17-30 beds (depending on which version of reality one currently subscribes to) being granted, on an off-street 0.09ha former garage / automotive works site. Their own outline drawings highlighted just what a 'nasty' little site this is, in terms of both practical arrangements and lack of outside space for any kind of thermal or acoustic 'discharge'. Oriented east-west, it abuts the gardens of about forty existing family homes, and is in very close proximity to multiple traffic restrictions, including school safety zones. Sandwiched in between the Broadway and the recent HMO explosion along the Kingston Road, infrastructural challenges already abound in terms of water, power, etc. All the usual stuff of life in London, or any other major urban centre, I hear you say... Modelling? It seemed to come as a genuine shock to the developers that some local residents were taken aback at the orientation of the units. When asked, they confirmed no solar mapping had been conducted, nor water / sewerage discharge modelling. Indeed. They had not apparently so much as seen the water maps for the locality. We were assured all this would be taken in hand in good time for their consultation meeting, suggested to be April sometime - time will tell? (We were already aware of the ten unit cut-off for SuDS.)</p>	No change proposed; comments relate to a planning application.
342	77		O'Shea, C	General comment - Whole Plan				<p>Additional Concerns</p> <p>Planning Portal states that land contamination is a 'material planning consideration' for sites known or even suspected to be contaminated.</p> <p>1. Surely then, under UK planning policy frameworks and documents (including the requirement for each LPA to publish a Brownfield Land Register, thereby recognising sites it regards as suitable / appropriate for residential development), each LPA should FIRST, before publishing any individual site to its Brownfield Land Register:</p> <ul style="list-style-type: none"> <li>- understand the contamination condition of the site;</li> <li>- satisfy itself that any future proposed development will not pose an unacceptable risk; and</li> <li>- garner / gather sufficient information to be confident that it will be able to grant permission bearing in mind the need for the necessary remediation to be viable and practicable?</li> </ul> <p>2. What then for sites not yet even listed on Merton's Brownfield Register as suitable or appropriate for residential development? Can it be right that speculative land developers / consultants / owners can somehow 'bypass' the required Register, identify an individual unlisted site and instead move direct to engagement with elected public representatives and officials of the LPA around a specific, future / imminent application that the LOA has not yet deemed suitable or appropriate for residential development before looking at the condition of the land in question? Is there to be no consideration of the potential degradation of the environment by individual proposals?</p>	No change proposed; comments relate to a planning application.
343	77		O'Shea, C	General comment - Whole Plan				<p>3. MULTIPLE, PROXIMATE SITES? Aside from car park runoff (including stormwater-captured road dust flowing into the watercourse, carrying with it polycyclic aromatic hydrocarbons (PAHs), petroleum hydrocarbons, and other poisons), heavy metal contamination is common in former automotive and garage sites, including: chromium (Cr), lead (Pb), nickel (Ni), cadmium (Cd) and cobalt (CO) (see reference below). What about small areas with a number of separate 'dirty' sites in close proximity to each other? For example, is it not reasonable to expect that Merton's Local Plan might at least mention such areas, particularly when they have historically been both marginal and ignored, a situation only compounded by recent revisions of electoral boundaries in close proximity? Under UK planning processes, how else can any kind of structured, framework approach be enabled? In terms of calculating risk assessment, how else can the LPA credibly guard against the potential dispersal, mixture and recombination of any pollutants / contaminants across and between sites on a cumulative basis, and the consequences arising for public health? The legislation speaks of contaminator-pathway-receptor linkages. Complex analysis is surely required where, for example, an individual site may not alone breach (for example) EPA 1990 Part 2A thresholds, yet where the future development of a number of 'old' dirty sites in sequence or together might cause a cascade of catastrophic effects by 'unlocking' pollutants / contaminants heretofore passively contained in undisturbed soil? Who bears the cost of all this - the LPA or those who seek the windfall gains arising from (effectively) changed planning designation of the site(s)? If so, are costs apportioned on a pro rata basis by site size, or is there some other tried and tested mechanism? Practicalities such as differing site levels and differences in the level of surrounding land must surely also be taken into account? (A brief example with numbers: if my adjoining garden is 50cm below the level of the proposed development site, and proposed foundation depth is 60cm, then surely soil samples must be taken to the level of 110cm below site level to ascertain what might have been 'captured' down there in preceding decades of established use?) Is calibrated augur or other soil sample extraction method typically employed - thereby enabling atomic absorption spectrometer, geo-accumulation index, pollution load index, etc. - or what is the preferred route to data?</p>	No change proposed. Policy P15.10 addresses air quality, pollution and land stability



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344	77		O'Shea, C	General comment - Whole Plan				<p>4. 'Cancer clusters' and other public health considerations? I have been in separate recent contact and keenly await response from Merton (Public Health and Environmental Health) about an apparent cluster of cancer cases (including deaths) in close concentration on this road, and possibly, others. Hopefully, it is nothing more sinister than merely, say, some kind of statistical anomaly, but we must reserve judgement until such time as the proper authorities can gather data and properly determine on the basis of individual's confidential medical data, over which we assume Merton has powers of compellability, (anonymising) in the public interest?</p> <p>5. Can the Local Plan expressly record / reflect the extent to which Merton, in previously rezoning industrial sites (including local 'clusters' of such sites) into residential use in the past, required one or all of the following remediation measures, (specifying also intensity) as a condition of planning to adequately reflect its accepted risk assessment of land condition:</p> <ul style="list-style-type: none"> <li>- Containment</li> <li>- Excavation and Disposal</li> <li>- Bioremediation</li> <li>- Soil Washing;</li> <li>- Thermal Treatment;</li> <li>- Chemical Oxidation;</li> <li>- Chemical Reduction; and / or</li> <li>- Phytoremediation.</li> </ul>	No change proposed. Policy P15.10 addresses air quality, pollution and land stability, including land contamination
345	77		O'Shea, C	General comment - Whole Plan				<p>6. In realising these risk levels, may it also be established whether Merton typically requires developers / builders to arrange specific insurances (whether at pre-application, application or subsequent phases) to guard against contamination risk, over and above 'normal' protection levels against the more generic 'pollution risk' within the construction industry?</p> <p>7. Execution phase - on polluted / contaminated land planning permissions, how far can the LPA go to reduce 'plausible deniability' risk by ensuring a single 'team' carries a project through 'from soup to nuts'...? Can the Local Plan provide mechanisms / impose planning conditions cognisant of shared site characteristics / density of particular site-types? Should the LPA choose not to make assessment of land condition a fundamental requirement of the pre-application or application phases of the process, what scope is there for the Local Plan to impose planning conditions such as, for example, requiring developers to go 'full plans Building Regs' with Merton Council once the proposed development enters execution phase?</p> <p>8. These particular developers might make more intelligent use of 'local knowledge'...? For example: Anyone who has ever dug a trench in their garden around here, whether to pour concrete foundations or for some other reason, will attest to how high the existing water table is. (The developers confirmed they hadn't yet consulted Thames Water so seemed completely unaware of this fact, as well as the pattern of typical sewerage discharge arrangements in the locality...?)</p>	No change proposed. Policy P15.10 addresses air quality, pollution and land stability, including land contamination
346	77		O'Shea, C	General comment - Whole Plan				<p>9. You're probably already aware that the High Court has determined that where a planning officer decides a case under delegated powers, reasons FOR granting permission must be granted (see case law: Sasha and others (as Trustees of the Placement Pension Fund) v Westminster City Council [2016] EWHC 3283 (Admin), clarifying interpretation of regulation 7 of the Openness of Local Government Bodies Regulations 2014 (SI 2014/2095)). A local Councillor has advised that about 40/2000 planning apps go to committee. Considering Merton's 'pockets of disadvantage' / more vulnerable communities within otherwise apparently equally affluent Wards such as Wimbledon Town &amp; Dundonald, surely it is all the more important some kind of sound, consistent and coherent Borough-wide approach is documented in something like the Local Plan?</p> <p>9. Housing shortages and cascading environmental collapse are (sadly) twin evils of our future times. As wealth-holding continues to concentrate, they are likely to accelerate, not reduce. All the more reason for LPA's such as Merton to get a specific plan in place urgently for handling applications to convert industrial sites to housing use, and to publish checklists for developers targeting individual / combined sites (as well as surrounding communities) so FACTS can be more readily established. (See again Reg 7, as referenced immediately above.)</p>	No change proposed; no main modifications identified for review.
347	77		O'Shea, C	General comment - Whole Plan				<p>A single comment on how we have got to where we find ourselves, if I may</p> <p>-</p> <p>The voting system in my home country (proportional representation, single transferable vote) provides for more nuance and subtleties than the current British one does. While it has its imperfections, it makes for great sport on election days, and I respectfully submit, is also far more helpful for the scale of future societal challenge we face than this crude and brutish notion of 'first past the post'. In closing, see below for your interest a pair of articles containing lists of some extremely interesting international source / reference material, freely available on Google Scholar.</p> <p>I await any response with a view to formally submitting more detailed comments on your published Main Modifications in good time for your 22 March deadline.</p> <p>The situation is pressing - we are fearful of an apparent appetite to 'hide behind' the blanket phrase, 'presumption of development' - without properly exercising conscience or flexing intellectual capacity to the maximum extent possible. We remain heartened, also, by the extent to which Councillors from within other wards are 'reaching out' and asking to be kept informed and included as we move forward with 'next steps', thereby confirming this particular change of use issue is, like most problems, a problem shared. Indeed, some have even asked you to be included if you or others would like to come out and do a 'walkabout' between the various sites on our streets to deepen your practical understanding of just one live test case...?</p>	No change proposed; no main modifications identified for review.
348	77		O'Shea, C	General comment - Whole Plan				<p>Car park run-off (road dust carrying polycyclic aromatic hydrocarbons (PAHs), petroleum hydrocarbons, etc): <a href="https://www.sciencedirect.com/science/article/abs/pii/S0301479714004265">https://www.sciencedirect.com/science/article/abs/pii/S0301479714004265</a></p> <p>- Garage and automechanical workshop contamination of soil, including (but not exclusive to) heavy metals: &lt;40068_2015_40_Fig1_HTML.gif&gt;</p> <p>Analyzing soil contamination status in garage and auto mechanical workshops of Shashemane City: implication for hazardous waste management - Environmental Systems Research <a href="http://environmentalsystemsresearch.springeropen.com">environmentalsystemsresearch.springeropen.com</a></p>	No change proposed; no main modifications proposed in this part of the representation.
349	77		O'Shea, C	General comment - Whole Plan				<p>Dear Calum,</p> <p>I am told you guys want to be made aware of 'community concerns' as early in your pre-application discussions with these Skillcrown fellas as possible? No doubt a more 'over-arching' account will come in from more directly impacted victims of the ludicrous densities, etc. they threw around at the first meeting shortly, but in the meantime, here goes for a solo non-surrounding neighbour run from the southern end of Gladstone. In the context of the forthcoming developer meeting about 129 Pelham, I wanted you to know how concerned I am about WATER - all aspects. (See below about the Hollybroom mess we are already facing into.) In the immediate aftermath of the shambles on 7th February, they were asked to attend better to the specifics of certain blandishments they were throwing about at their last meeting (I'll forward you an email shortly that explains a bit more) and to stop patronising more vulnerable members of the community with silly talk about TRELIS, when people around here are this week literally CRYING ON THE STREET about damp problems in rented accommodation (as we are already living so low to the water table before Archimedes Principle makes it all so much WORSE). Life was already pretty gritty and real here on Gladstone Road even before the local authority gave permission for 300 beds of PBSA on the Kingston Road when we have a Weatherspoons at the top of the road, and persistent local weed problems, known to the Safer Neighbourhood Team and others. (Can the SBD Gold be written in as a planning condition, please?) TBH, no one seems really much in the mood for fellas coming out again on 12th to blabber on about trellis. They would be doing us all many favours if they took themselves, and the spatial, physical and contaminant-related realities of the site they are purveying a bit seriously, and spoke clearly about issues such as BIN PLACEMENT, living roof depth (not cheap and nasty trays of ugly sedum, which does NOTHING to enhance building fabric performance, responsible identification and remediation of what's in the ground under a former coal yard / car park, etc.</p>	No change proposed; no main modifications identified for review.
350	77		O'Shea, C	General comment - Whole Plan				<p>As the first to arrive and last to leave (with other neighbours) at their last session, I will be writing to them separately: - to reiterate some 'local knowledge' points that came up which they have apparently failed to document in their feedback letter to some residents (e.g. conflating fox habitation and DEPTH OF LIVING ROOFS); - to remind them of some commitments given (e.g. solar modelling of site orientation to make sure they fight WITH rather than against nature in positioning any newly constructed units so as to harness natural positives, rather than just brainlessly building where the current sheds stand because they don't understand the lived realities of site history pre-1970's); and - to state again, this unique site requires MUSCULAR dispatch of engineering-related practicalities, including services - not some stupid, cursory 'lipstick on a pig', bing-bang-bosh, lampshade twiddling fantastical approach whereby community members are expected to believe applying BREEAM to new schemes is some kind of middle-class aspiration, rather than a desperate necessity for sustainability.</p> <p>I am also going to ask them about supplying tea and buns as a courtesy, but that is probably just the Irish coming out in me. When I used to manage community consultation and engagements within a local authority area in Ireland, you'd be lynched if you brought people out between 5.30 and 7.30 in the evening to stand around (tired and hungry) in dribs and drabs having random, unstructured chit-chat with surveyors that claim not to understand about roof depth, S6 of the PW Act, etc, planners that don't seem to know whether they are in the employ of the developer or the local authority and that pair from the comms agency flapping contradictory drawings about the place.</p>	No change proposed; no main modifications identified for review.

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351	77		O'Shea, C	General comment - Whole Plan				<p>We are not the kind of community that responds well to being patronised in these multiple respects, nor to having ground contaminants released into the wider ecosystem from MULTIPLE local sites or left to lodge in heavy, wet ground beneath our houses until such time as we are begin to GLOW from what we are ingesting.</p> <p>I will copy in your public health also, as I already have queries lodged with them (and others) about an apparent cancer cluster in the middle of our street (for future reference, north of the Steve Redfearn site) that no one seems interested in properly looking at?</p> <p>When future generations ask 'but after you knew, what did you DO' I for one will not be left to answer 'nothing'. I presume these developers have been given access to your Local Plan (including Main Modifications - v LBM31, I think? Although in the whole, vaguely schizophrenic in its simultaneous adoption of conflicting objectives, there is a lot of good stuff about actual local housing needs, overheating and water which they should probably read. We know Skillcrown have conditional contract (no doubt ratcheted to planning permission density obtained) with John and Michael. Some of the four gentlemen representing them at the FIRST developer meeting told some community members that ' Skillcrown intends' (whatever that means) to build it out, and sell to individual owners. If so, can this please be documented as a condition of planning? Because of the prevalence of 'escape of water' claims, short-cuts like plumbing by means of push-fit plastic piping should be shelved, particularly if this is ultimately to become a build-to-rent scheme with a 'juice early-yields'-and-flip-it-after-five-to-seven-years-approach instead of the more pleasant scenarios they conjures up at their meeting in February. They (spontaneously) assured us no planning application would be made until ATER the new biodiversity net gain regime comes into place in April, so can you ascertain what arrangements are in place for independent ecological site audit in the meantime?</p>	No change proposed; no main modifications identified for review.
352	77		O'Shea, C	General comment - Whole Plan				<p>The forgoing is all a bit 'random' as we are so early in the prosecution of the planning process. TBH, I was not familiar with requests for bilateral community communication with the planners during pre-app, although (naturally) I welcome any opportunity to attempt to positively influence them. They should also STOP comparing with Graveney Mews. A vast site, by comparison, with an open and well-overlooked approach. Too many of us have been down for a look, and seen their sickly trees and overgrown single planting bed, about which I am already in correspondence with your colleague Leigh (contaminant testing, although it is more likely to be something like cadmium that lead, as that kills people without killing its 'host', vegetation. Because of site proximity, this additional development cannot rightly be considered in isolation from the 40+ homes surrounding. If releasing toxins by, for example, having Thames Water dig up the alleyway to install and connect services, will render people surrounding unable to safely grow vegetables, or say, edible flowers, in the surrounding lands, you need to make sure THEY KNOW and are appropriately compensated.</p> <p>have a lot of scientific journal articles about normal old coal / auto / garage land land contaminants - just shout if you would like to see, mainly Google Scholar. Where there is a CLUSTER of such sites, there is obviously an exponential risk of harm in terms of recombinants, whether through simultaneous or sequential site development. I think it a DISGRACE your Local Plan appears to contain NO hydrological maps, nor reference to our position on these streets, despite mention deprivation of Abbey Ward, when Russell Road is split between it and Wimbledon Town and Dunderdonald.</p>	The hydrological maps are included in the Local Plan evidence base in Merton's Strategic Flood Risk Assessment - see document 15D7 in the examination library
353	77		O'Shea, C	General comment - Whole Plan				<p>Hollybrook's other recent UAL project in Peckham also catches the eye: [picture of the scheme] It has been put to me that although larger in scale, the same queries apply as to the adequacy of the pre-commencement actions you took to accurately establish what precise contaminants are in the ground, and in what quantities, and how you remediated to make sure none of them leached into the watercourse, whether on- or off-site, in the form of spoils? My reason for asking is that no one is able to tell me what we are to do when the water is gone...? It will make Covid look like a stroll in the (no pun intended) park. England has increasingly seemed to lack the structures, competence or appetite to deal with the fact that private, commercial interests are turning the rivers of this once 'green and pleasant land' into actual cess-pits, but it has saddened me more than words can say to recently realise old industrial sites are being used for housing with no apparent care for releasing hydrocarbons, heavy metals and who knows what other poisons into a scarce and diminishing resource. Your apparent failure to apply any meaningful BREEAM measures whatsoever is another wasted opportunity, unless I have misinterpreted your position on living roofs, water capture, etc? I have copied in FAO (having written to her directly days ago) as I am also shocked an institution like her own would support such practices. I cannot imagine its students will thank her for this attitude to water, nor their future, as-yet-unborn children and grandchildren.</p>	No change proposed; no main modifications identified for review.
354	77		O'Shea, C	General comment - Whole Plan				<p>I note with interest the importance you attach to sustainability:</p> <p>&lt;image0.png&gt;</p> <p>Considering the nature of the three industrial sites you are astride at your 271/bed PBSA project at the intersection of the A298 and tram lines near South Wimbledon, can you please reassure me with details of your risk assessment methodology in the above regard?</p> <p>Can you please also explain how the statements published to the 'Sustainability' section of your website are actualised in 'real life' and how they apply to your planning documentation in respect of this project:</p> <p>&lt;Hollybrook-Kingston-Road-Wimbledon-CGI-1.jpg&gt;</p> <p>Kingston Road - Portfolio - Hollybrook hollybrookhomes.co.uk</p> <p>People were clearing site yesterday, and works appear imminent, so the courtesy of your earliest response will be much appreciated, not least because of the scale of ground works proposed, and the necessity of keeping hydrocarbons and heavy metals out of the country's water supply before we and all our children are DEAD OF CHEMICAL POISONING.</p>	No change proposed; no main modifications identified for review.
355	77		O'Shea, C	General comment - Whole Plan				<p>I write (pending the opportunity for more detailed elaboration in due course), to formally raise for your consideration, and the incontrovertible record, the notion of clean, safe drinking water as a developmental and planning necessity, as well as basic human right I fear Merton has overlooked, both in terms of:</p> <ol style="list-style-type: none"> <li>1. your draft Local Plan (copying FutureMerton, naturally), add</li> <li>2. your imposition of planning conditions / subsequent derogations apparently awarded to corporate property developers and other successful applicants.</li> </ol> <p>I am a long term resident (as tenant and owner) on Aside entirely from the impact your decision to award permission to Hollybrook for almost 300 units of PBSA (Purpose Built Student Accommodation, a well recognised asset class in the modern age) without any community 'accommodations' documented anywhere in response, through your service to the Borough as an entity, you are no doubt already aware of the extent to which clusters of small auto and garage sites proliferate some local areas, none more so that at the intersection of Abbey, Wimbledon Town &amp; Dunderdonald and Merton Park wards, namely Gladstone, Pelham and Russel Roads and their hinterland. See the WHO Guidelines for drinking water quality (including both first and second addenda) wherein it states:</p> <p>Many... chemicals...used in small industrial units within human settlements...particularly where such units are found in groups of similar enterprises...may be a significant source of pollution. Petroleum oils are widely used in human settlements, and improper handling or disposal can lead to significant pollution of surface water and groundwater. [PDF document "guidelines for drinking water quality] See also (ONE international example of how other countries approach this matter), US EPA publications on heavy metals, including: [PDF]</p>	The regulation of drinking water is at a national level - see Water Supply (Water Quality) Regulations 2016
356	77		O'Shea, C	General comment - Whole Plan				<p>If YOU as the LPA fails to ensure individual contaminants are properly assessed before commencement of private, residential housing development on old industrial sites, there is even less hope that the potential dangers of what hydrochemists call 'recombinants' can be accurately identified across and between individual sites that share the density of hydrocarbons and particularly, heavy metals common to former coal, garage and auto sites before they are released into the water course. In case you are unaware of the STATE of the Wandle as it flows north from here, please see the Royal Society of Chemistry's heatmap, as it relates to endocrine disrupting compounds, which cause CANCER, infertility, birth defects, etc. Read on below from more background information, call me on REDACTED or to see how light touch, self-certification regulation used to pan out for communities (black teeth, cancer, death, etc.) simply watch movies such as Erin Brockovitch or say, Dark Water with Mark Ruffalo for the Hollywood version of today's impacts of what was merrily put in the ground in previous decades (primarily since WWII, when chemistry - and other branches of human endeavour - REALLY got dangerous to our future wellbeing.)</p> <p>It is one thing profit-seeking developers and PBSA operators acting like a gang of crazed, greedy children, while bleating and shedding crocodile tears at the community about their noble intention to 'solve the housing crisis' that is largely of their creation on the first place. It would be quite another if our Local Authority were to continue (apparently) ignoring the water quality and Public Health consequences for the community of dirty (old industrial) land being used for PBSA, BTR and other corporate purposes without adequate pre-commencement assessment of both individual and combined causes of genotoxicity, carcinogenesis, etc. and effective remediation thereof.</p> <p>Considering past activities and disposal practices (of batteries, solvents, etc.) in previous decades. I support the above with recent correspondence from the Department of Levelling Up, Housing and Communities about interventions it currently has under consultation to assist LPA's in the detail of both interpreting and applying broad national policy pronouncements on developing 'brownfield' (both industrial and non-industrial) sites before irreparable harm is done to our shared (albeit currently privately-owned) water. I suppose we must just bite down hard, remember Annington and for the sake of all of our children, continue to hope for a better future than this country's recent past.</p>	No change proposed. Policy P15.10 addresses air quality, pollution and land stability, including land contamination

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357	77		O'Shea, C	General comment - Whole Plan				I am less 'muzzled' than either their own tenants or neighbours who rely on their goodwill (for tree-pruning, etc.). Having lived beside them for so many years, and been the victim of their tactics too long (and too many times), please forgive me if I lack the energy to offer more than a two-word comment about their most recent email to you, which you were kind enough to share last night: Leopards. Spots. Please note also that (unsurprisingly) the area has been left in a disgraceful condition. Pallets lying about, ground not cleared, etc. During Covid lockdowns how lucky were the Gladstone Court children - unlike so many others (including my own, due to neighbours' development aspirations / value systems and priorities) - to have outside space to play (albeit not to the liking of all surrounding neighbours??), but Wandle would want to send someone out with a yard brush before they can do so again safely. Similarly for parking, etc. - although probably NOT the multiple gangs of teenage youths that congregate there surreptitiously - albeit briefly - in the middle of the night / early morning hours on power-assisted bikes, segues, etc. - as recently raised with the Safer Neighbourhood Team (PC and PCSO's), Scotland-Yard based DOCO for our area and others. (Usually Thursday / Fridays, for your information...?) The fact Wandle finally cleared their 'camp' on the very morning Skillcrown announced the date of their Second Consultation to the community is indeed a strange coincidence, and may speak to their established 'business partnership', as advertised to their website (see photos, 6th Feb): <IMG_1880.png> <IMG_1879.jpeg> Aside from all that, I had also written to the Head of Legal for the tri-Borough partnership less than 48 hours previously (see below) about your service of enforcement on Normic for operating a car park at and others have owned that land almost as long as I have been alive, and understandably, were trying to turn a bit of 'coin' out of it.	No change proposed; no main modifications identified for review.
358	77		O'Shea, C	General comment - Whole Plan				What was the motivation of Merton Council is moving to enforcement as quickly as you did, and by whose authority? There are some extremely 'hairy' statements and views in circulation in this regard, and many local people are deeply puzzled, and indeed, outright troubled, by the apparent discrepancy in response from the LPA. While the owners / developers / Merton Council may advise it has heard 'talk' from concerned neighbours about crime risk, this does NOT seem to have percolated through to the SNT at all? (Odd? ) Were complaints made generally (for example, by a representative sample of surrounding / nearby neighbours) or a few outliers? Did anyone take care to look at the profile of such complainants, and whether inducements may have impacted their behaviour? (You'll appreciate why I would raise the issue of partiality, not least because of the additional months that were lost in respect of Wandle's decision to operate a builders yard upon the outside space at Gladstone Court, arising out of the alleged pronouncements of some anonymous alleged plumber or other, at the same time as neither the Council nor any other party could 'nail them down' to simply TELL THE TRUTH.) After a certain point (7 Dec onwards), those of us who suffered worst at the hands of Wandle banged on at anyone who'd listen about the constant whining noise of those generators and other detriments they caused us to suffer, yet despite contradictions in their own published statements, simple GOSSIP and HEARSAY (your officer's reference to the unsubstantiated word of an unidentified member of some 'plumbing team') was enough to stay the hand of your enforcement team, while barely around the corner, something that arguably provides a valuable service to the broader community (parking) was served? (Whether anyone likes it or lumps it, people still drive cars, and many will continue to do so. We are all aware of how the local parking situation has 'tightened', even since Covid - due to EV charging points, and other factors such as the illegal parking and dangerous driving caused by the explosion in motorbikes and other 'delivery vehicles', some delivering fast food and other 'products' around the neighbourhood - as discussed with the SNT on a recent visit, many of whom live in the HMO's that have sprung up at the bottom of the road.	No change proposed; no main modifications identified for review.
359	77		O'Shea, C	General comment - Whole Plan				With 271 students - 14 of whom will be Blue Badge-eligible - coming to live at the end of the road after / before Hollybrook advise what toxins (if any) are embedded in the ground at Waterfall and Rutlish, and how they will keep them out of the national watercourse (see already the extent of endocrinedisrupting compounds in the water directly downstream of us along the Wandle here - imagine what will happen public health as this continues to 'back up' into our locality?? This is analagous to how heavy metals bioaccumulate in any given human body - we cannot 'clear' them, hence DNA impacts, infertility, cancer, ulcerative colitis, etc. Why does England, alone of all the nations on the Earth, behave like this? We can't simply blame 'posh schoolboys at the helm for everything. The causes lie deeper, possibly in a general attitude of 'lack of accountability' caused by your colonial past? Speaking of 'easy come, easy go' attitudes, I am also intrigued as to how former residents continue to drive in from other Boroughs, drop their children to local (private) schools and park in 'residents only' areas of our street while going off to work in what one neighbour calls their 'big jobs' / shopping despite no longer being resident on our street? Is this enabled by the unanticipated effects of privatisation (e.g. Ringo not shutting down annual visitor permits properly when homes are sold), or is it instead facilitated by grubby individualism - former residents cynically 'stacking up' on physical half-day or day permits before they cash in their chips and move on, while at the same time, wishing to (apparently, wrongfully) maintain their entitlement to park here as if still resident? As pressure mounts (including the people the 271 students will unavoidably 'trail in their wake', particularly around holiday pick-up and drop-off), this kind of behaviour, while not to be esteemed, is unlikely to reduce - yet you want to CLOSE the facility at 129 Pelham??? Strewth! And WHY? Better convert it into an EV charging park, as one community member suggested recently...???	No change proposed; no main modifications identified for review.
360	77		O'Shea, C	General comment - Whole Plan				welcome your views, while I continue to await a response from your Head of Legal. While it is welcome the Council gets itself a little better organised in this regard, whatever Enforcement Plan comes before the Council in coming months (cf Jon's email last week) will do nothing to unravel the mistakes of the past, or their (possibly unintended yet) perpetually catastrophic consequences for existing residents, and further afield - e.g. heavy metals in the water. How can the development plan offer us NO protection, and why is there nothing evident in terms of controlling use of the student facility so we could at least enjoy a little respite in summer months, instead of allowing Hollybrook and any future corporate owners to further 'juice' short-term yields (per the Build-to-Rent model) by taking in English-language students for the summer months, thereby depriving local residents of what has been to many a crucially important revenue stream, particularly when their own children were at university...? As any parent will mourn, acceleration in the consolidation of resource ownership into the hands of the few at the expense of the many is the modern equivalent of Empire and colonialism, and to any right-minded person, OBSCENE, in that it cannot but lead to lives of sickly poverty for coming generations as water becomes increasingly commoditised and the 'un-do' costs of the actions of current generations increasingly slip beyond the capacity of future ones to bear. Fully thirty-five years ago now, while most of my our economics class aspired to become investment bankers, I elected to study subjects such as Environmental Economics. At the time, it was almost unheard of, but on the basis of common sense alone, it seemed self-evident that it would become critically important as populations and inequality continued to increase.	No change proposed; no main modifications identified for review.
361	77		O'Shea, C	General comment - Whole Plan				I appeal to you to have Merton do all it can to show leadership on the critical importance of the 'polluter pays' principle, particularly as it relates to 'dirty' sites. Pre-agreeing to a bond requirement to remediate against future infertility, cancer and other public health problems shouldn't cost a corporate developer a thought, unless of course they are operating to the same principles as PG&E in Hinkley, Ca and DuPont in West Virginia, where they exposed themselves to HUGE reparations because 'crimes' (or at least, acts of abuse, while perhaps not then technically illegal) against the people, were covered up, manipulated around and generally 'kicked to touch' until such time as they could no longer hide the fact that the animals were dying in the fields, that people's teeth had turned BLACK from excess fluoride, and that there is a critical difference between Chromium 3 and hexavalent Chromium in terms of their impact on human DNA. I would invite you to consider my grandparents words to me as a young child (oldest of six), when they used to say 'if you aren't part of the solution, you ARE the problem'... No developed country on Earth is behaving like this one when it comes to future supplies of clean, safe water - <a href="https://www.rsc.org/policy-evidence/campaigns/ environmental-sustainability/sustainability-reports-surveys-andcampaigns/cleaning-up-uk-drinking-water/">https://www.rsc.org/policy-evidence/campaigns/ environmental-sustainability/sustainability-reports-surveys-andcampaigns/cleaning-up-uk-drinking-water/</a> . Check out WHO references and national ones like US EPA / or I can forward if you like? England stands alone, in all the WRONG senses.	No change proposed. Policy P15.10 addresses air quality, pollution and land stability, including land contamination
362	77		O'Shea, C	General comment - Whole Plan				Like me until recently, are you blissfully unaware thatacceptability thresholds here for some industrial effluents in the water run about TEN TIMES higher here than international norms, under-testing is a HUGE problem, yet STILL, the scale of the problem is GIGANTIC and GROWS - including, with every careless planning permission award / WRONGFUL minor amendment or derogation in environmental quality standards 'negotiated' out of a local government system on the downwards trajectory to complete collapse since this country first signed up for this mysterious - and selective - beast called 'Austerity by any developer(s) post-award - no matter how well-intentioned!! The cumulative effect of all our actions is what can save us - or what will damn us. I've had dealings with too many property developers / in this town and elsewhere - to buy their lines about their noble attempts to single-handedly solve the housing crisis. They are profit-seeking entities, with little incentive to create homes above the minimum design or build standards, except in sticky markets. Apologies - as the (much older) child of a (former) politician myself, dread bringing your own child into this, but I understand you have a daughter? Think of her and her generation? It is one thing to be homeless - it is quite another to be homeless and dying of thirst. I truly watch my children's teeth - and think about their future - in a whole new way since this all came to light over the last month or so. Rest assured the property-owning classes in this country may be able to starve local government of resources, refuse to renationalise the water and generally (foolishly) curry favour with private interests who finance their electoral campaigns within an extraordinary (and again, internationally exceptional) voting system, but I defy them to deprive me of my parental concerns or right of access to my own keyboard. Apologies for bothering you, but this will pertain as long as my adopted country of residence insists on acting like the exception that proves the rule.	No change proposed. Policy P15.10 addresses air quality, pollution and land stability, including land contamination

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363	77		O'Shea, C	General comment - Whole Plan				PS UAL kicked things over to Hollybrook, who've gone 'radio silent' so if you have any contacts within either of these corporate entities, you might care to tell them that considering the annual rental yield they will pocket from their filthy site at the end of my road, they should have the basic MANNERS and COMMON DECENCY to do the proper assessment of ground contaminants (individual and collective, allowing for mixing and combining when the ground begins to be disturbed) and respond to emails with specific community queries addressed to them? (Not least because my home is half-way between their rather aggressively sited 'student village' (or as some neighbours are calling it, 'The Hostel' and the nearest Weatherspoons. ) They may well have gotten away without identifying what's in the ground at former sites, but not this one, where they are SURROUNDED by a VERY mixed community which has been woken up to our plight. We all need to 'think globally, act locally', particularly when the national policy framework is so very weak and fractured. It is like good PARENTING. If the LPA does not act mindfully and put in planning conditions to guard the community against brainless, ignorant assumptions of the part of those who purport to 'develop' our communities, then we are all DOOMED, and it is only a matter of time before EVERYONE gets sick, and all our teeth start to turn black. This particular genie (hydrocarbons and heavy metals leeching / being otherwise released into the national ecosystem by the creation of housing units (including sewerage connections) at former INDUSTRIAL SITES (including historic coal, garage and auto sites) will not be easily put back into its bottle. Neither is it any kind of SECRET on the international stage to bodies such as the WHO, at least - see bottom p.191 for one specific reference.	No change proposed; no main modifications identified for review.
364	77		O'Shea, C	General comment - Whole Plan				Happy World Water Day, ironically enough. Planning applicants trousering excessive change of use gains and then flipping sites and walking away before actually completing on their proposals has been very much on my mind since 7 February last. We are all aware of the PLANNING CRISIS, and how this has manifested in the unaffordable supply of housing, due to market manipulation and other factors. Fail to plan, and you plan to fail. Where an LPA allows itself to become so confused and distracted that it stumbles around in some kind of 'fog', as it were, responding in a completely reactive manner to whatever planning applicant happens to decide in the moment to try their luck on the roulette wheel of chance and happenstance, neither optimisation of housing supply based on local need nor development in the broader sense are unlikely to follow. Paragraph 41 of the NPPF states that 'the more issues that can be resolved at preapplication stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'. Hollybrook's UAL development (Merton 23/P0329) is an excellent case in point, where despite the 'dirty' nature of the land (old garage and auto sites are particularly notorious for contaminants such as hydrocarbons, degreasers and other aggressive solvents, and heavy metals) in more than one plot used to assemble this site, what recent correspondence from the Department of Levelling Up, Housing and Communities describes as 'the depth and spread. of contaminants is apparently a pre-commencement irrelevance to the LPA, despite common sense and its responsibilities re.the Water Regulations 2017. Lack of soil testing, laboratory analysis and quantification do not inspire confidence. I have grave reservations about the Merton Plan, and cannot imagine how its provisions can be deemed adequate to the societal challenges we will all unavoidably face in the run up to 2038, not least the long, slow rolling Grenfell that lies at the 'beating heart' of (literally) everything - namely, the need for clean, safe water.	No change proposed; no main modifications identified for review.
365	77		O'Shea, C	General comment - Whole Plan				Furthermore, the lack of any kind of development planning around housing site 'pipelines' by Merton appears to have given rise to what seems an unstructured, free-wheeling approach to awarding permissions in what appears a careless manner. 'Pin the tail on the donkey' is no way to run a Borough especially when prey to planning applicants with an appetite for Planning Inspectorate Appeals, Judicial Review, etc. My own community has a density of old auto and garage sites that goes unrecognised or mentioned in the Local Plan, despite irreversible consequences for the locality, and particularly the Wandle of such contaminants (including HEAVY METALS) being released into the water table, as the PFAS levels barely downstream from here are already such a concern to those who understand such matters far better than I. English tolerances run at about TEN TIMES international norms, testing regimes are A COMPLETE JOKE and largely because of the crazed ideologies of a rabid past, private ownership of this most precious resource has done nothing except promote THIRTY FIVE YEARS of cashstripping, failures to invest, debt mountains being generated that require about 28% of revenues to service (DESPITE Thatcher 'cleaning' their balance sheets before selling them) - all culminating in actual POOP being cynically pumped into the watercourse as it costs less than DOING THEIR JOBS RIGHT...?!! Since early Feb, I lie awake in my bed wondering what's ALREADY coming out of my tap in terms of genotoxic carcinogenesis - miscarriage, birth defects, cancers, ulcerative colitis, etc...??? Doubtless, this will all be ignored until it can't be - e.g. people's teeth turn black, as was the case in Parkersburg, West Virginia where DuPont's dominance lead (no pun intended) to utterly foolish decisions and outcomes. It is certainly not receiving mention in the Local Plan or revisions thereto.	No change proposed; no main modifications identified for review.
366	77		O'Shea, C	General comment - Whole Plan				Anyone with a brain in their heads can describe the consequences of the manner in which resources have been stripped out of the public realm, so I won't bore us all again by running through it again here. Suffice to say, the lack of capacity / appetite for planning conditions and obligations within Merton is a complete wonder to me. Laissez faire had its day in the Klondike, and efforts afoot by In terms of CONSULTATION, my community has recent cause to reflect upon the selective interpretation of the legislation by planning applicants, including those which employ elected public representatives from within other Boroughs to promote their proposals locally. I will close by saying that I have no sense that the Local Authority has engaged The Community (odious term) in any novel or particularly fruitful ways to inform or obtain mandate for many of the provisions of the Local Plan, as evidenced by the failure to so much as address (or remediate) the unavoidable increase in water consumption of the All England Lawn Tennis Club arising out of its recent planning application. I am tired of hypocrites 'crying' about the co-called housing crisis and the state of the environment, and expecting they will somehow 'dodge the consequences' when the CHICKENS contained in the sophistry of certain sections of this Local Plan some home to roost.	No change proposed; no main modifications identified for review.
367	78		Palmer, J	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		See my objection below which I know should have been forwarded by 8th March but I hope you will take into consideration:  Page 363-364 Policy H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:  Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.  As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.  In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.  As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .

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368	79		Palumbo, M	04 Mitcham	Mi16 Mitcham Gasworks			<p>I'm writing this to express my objection to MM62 Mitcham Gaswork. I am currently a resident of Mitcham and I live very close to the site, ADDRESS REDACTED</p> <p>I'm very concerned about the proposal as it would change the aspect of the village and would cause major issues to the area. We cannot accept such tall buildings and the overcrowding would be intolerable for the already little service we have.</p> <p>I hope the MP and the councillor will take in serious consideration my concerns on the matter.</p>	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
369	80		Parkside Residents Association	09 Wimbledon				<p>The membership area of the Parkside Residents' Association includes roads which adjoin the landholding of the All England Lawn Tennis Club (AELTC) bordered by Church and Somerset Roads Wimbledon.</p> <p>We have contributed to previous consultations on earlier drafts of the Local Plan and at the Hearing which took place in October 2022. In view of its proximity to our membership area, our particular focus has been with Site Allocation Wi3, the All England Lawn Tennis Club, Church Road, Wimbledon, SW19 5AE and modifications made to that Allocation during the Draft Plan's Examination stages. This submission responds to the consultation launched by Merton on 2nd February 2024 on the latest main modifications in the draft Plan and with particular reference to the further changes relating to Site Allocation Wi3.</p> <p>The texts to which we will refer are as set out in Merton's LBM29 MM Appendix 6 (MM115), LBM30 (AM167) and, as appropriate, as set out in the reissued draft of the Plan LBM31 dated January 2024 which incorporates the proposed changes to Wi3 on p 300 and pp 307-310. Our comments are as follows:</p>	No change proposed; no main modifications identified for review.
370	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	Wi3 area – Correction of Map Error (LBM 30 AM167	Wi3 area – Correction of Map Error (LBM 30 AM167	<p>We are pleased to note that in this draft of the Plan, and accepting the arguments that we and other Residents' Associations and the Wimbledon Society had made in earlier submissions, Site Allocation Wi3 no longer includes the land to the east of Church Road, comprising the former golf course in Wimbledon Park which is also owned by the AELTC. Instead Wi3 is now limited to 3 parcels of land to the west of Church Road which together house the AELTC's headquarters (including members' facilities) and core facilities and infrastructure required to host and deliver the annual Championships. We support this change which is confirmed on the Maps shown in LBM29 MM114 and LBM31 at p300 and the text of the site description in LBM31 p307. Unfortunately there is an error in LBM30 AM167 which suggests the former Wimbledon Park golf course on the west side of Church Road is still part of Wi3. Since this is at odds with MM114, LBM31 p300 and the Site allocation text at P307 we assume this error can safely be ignored.</p>	Support welcomed. Error in AM167 map corrected to align with the correct map shown in LBM31 on page 300.
371	80		Parkside Residents Association	09 Wimbledon	Site Allocations introduction	Page 300		<p>2.2 Unfortunately, LBM31 shows at p300 that the above paragraphs have been deleted as the purpose for the 13 Site Allocations (including Wi3) for Wimbledon listed in Chapter 09. Instead, alternative wording for Wimbledon's Site Allocations' framework is substituted:</p> <p>"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 type 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."</p> <p>No explanation is offered as to why this substitution has been made. The alternative wording is little more than a narrative list of different types of development as opposed to an indication of the relevant parameters and the approach which is to be adopted for identified Sites in a strategic development context. It also fails to acknowledge these Sites as "key potential development sites of strategic importance" or that redevelopment proposals should ensure that the Site "integrates well into its surroundings and contributes towards meeting strategic needs...". No evidence is offered as to why the Wimbledon Site Allocations, which have been included with this acknowledgement in earlier drafts of the Plan, apparently no longer justify this characterisation or assessment criteria. Why should a different framework be adopted for the strategic development significance of Sites in Wimbledon (including South Wimbledon) compared with those in Colliers Wood, Mitcham, Morden, and Raynes Park? It is a particularly incongruous approach given that elsewhere in the Plan, Wimbledon is identified as the Borough's "only Major Town Centre, and the heart of its successful economy" and where clarity of strategic development priorities for key potential development sites is surely of great importance. 2.3 This amendment is not noted in the summary in LBM 29 nor in the Additional Modifications in LBM30.</p> <p>Has it been mistakenly included in LBM31? In any event it is our view that subject only to our comment in para 2.4 below, and for the sake of consistency throughout the Plan, the amendment should be deleted and the original wording, as adopted elsewhere in the Plan for Site Allocations in other parts of the borough, should be reinstated on page 300 of LBM31.</p> <p>2.4.1 As a drafting point, we have noted and concur with the view of the Wimbledon Society at p4 of their submission dated 19th March that Site Allocations should NOT be characterised as "planning policies" (our underlining) as stated in the opening sentence of the descriptive paragraphs noted at point 2.1 above. Site Allocations are bespoke "land use requirements" for specific sites with strategic significance and not planning "policies" as such which are intended to apply across the whole Borough and apply in wider contexts. Accordingly the reinstated paragraphs on P300 should begin: "Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site comes forward for redevelopment.....etc etc"</p> <p>2.4.2 It follows from our comments above, and for consistency in the Plan that the same introductory wording should be adopted for these paragraphs where they appear in the Chapters for Colliers Wood at p82, Mitcham at p116, Morden at p197 and Raynes Park at p232</p>	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
372	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>3. Should Wi3 be retained at all as a Site Allocation?</p> <p>As noted above, the land now comprised in Wi3 to the west of Church Road houses the AELTC's headquarters along with core facilities and infrastructure required to host and deliver the annual Championships. It has been used for this purpose, and nothing else, for over a century. It is intensively developed already with much of the current infrastructure either recently completed or subject to cyclical upgrades. It is not a vacant site and certainly not "brownfield" like many other Site Allocations elsewhere in the Borough where viable alternative uses meeting different strategic objectives can usefully be identified. Unlike those other Sites, the scope for any redevelopment, we suggest, lies principally in upgrading or replacing existing facilities to continue the existing uses – as happened when a roof was added to Centre Court, or when No 1 Court was rebuilt with a roof, or when the members' Indoor Courts' building was replaced, and more recently the Media Centre was rebuilt. We query if this potential is consistent with the strategic objectives contemplated for other Sites designated with Site Allocations because their scope or capacity for additional or alternative uses is recognised? As such, and whilst we recognise that no Modification to this effect is proposed, we would respectfully ask whether, on reflection, there is any justification for the retention of Wi3 in the Plan as a Site Allocation at all?</p> <p>If notwithstanding our comments above, it is the Inspectors' view that the Site Allocation Wi3 with the area as presented in this consultation should be retained in the Plan, then we have the following comments upon the proposed changes to the text as noted in LBM29 and LBM31 where a number of conflicting amendments and apparent drafting errors appear:</p>	No change proposed. Site allocation Wi3 is a sporting facility of international and national significance that currently attracts c500,000 people to Merton each year. Planning applications are regularly received for the site. The site and its surrounds have significant planning designations. A site allocation is appropriate.
373	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>4. Comments on Wi3 map and text changes: LBM29 MM Appendix 6 (MM115) and LBM31 pp307-310</p> <p>4.1 Map error LBM29 MM115</p> <p>The area of Metropolitan Open Land within Wi3 is incorrectly shown here as being reduced from the current designation. As confirmed by Merton's Tara Butler in her email of 20 February to C Coombe and others who had queried the point, the MOL boundaries within Wi3 "are to remain as they are in the 2014 adopted plan." The 2014 boundaries are correctly used in LBM31 p307 so we assume this should prevail. 4.2 Ward error LBM29 MM115</p> <p>Wi3 is within Village, not Wimbledon Park Ward. This is corrected in LBM31 p307 so we assume this should prevail</p> <p>4.3 Site description - paras 2 and 4 errors LBM29 MM115 and LBM31 p307</p> <p>(NB Although the errors listed below are not noted in LBM 29 or LBM 31 the mistakes are factual inaccuracies and contradictions which have not previously been picked up and so we respectfully suggest that this Consultation is the opportunity to address and correct them)</p>	<p>Amendment made to Schedule of Main Modifications to replace map show in MM115 (appendix) to be the same as map shown in LBM31 (i.e. no change to MOL boundaries.)</p> <p>Amendment made to Schedule of Main Modifications to change ward from Wimbledon Park to Village, as already shown in LBM31: the whole plan containing proposed modifications.</p>

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374	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>4.3.1 To clarify, the Site which is Wi3 now comprises 3 separate parcels, namely (i) (the largest of the 3 parcels) the AELTC's headquarters, known as the "main site", on the western side of Church Road, incorporating the Championships' outdoor courts, stadia and infrastructure, the AELTC's offices and administrative facilities, members' and debenture holders hospitality facilities as well as the Lawn Tennis Museum</p> <p>(ii) a smaller site to the north of the main site, adjoining Bathgate Road, housing the AELTC's croquet lawns and croquet players' clubhouse, and</p> <p>(iii) to the south of the main site, a site adjoining Somerset Road and Maryat Road incorporating an Indoor Courts complex and 6 all-weather outdoor courts for AELTC members' use.</p> <p>4.3.2 Para 2 says there are "18 outdoor and indoor courts" yet para 4 refers to "covered courts to the west and 22 grass courts in a site to the north". Neither is correct. The only indoor courts in Wi3, as noted above, are the 6 in the Members Indoor Courts complex off Somerset Road. On the "main site" within Wi3 there are 4 show courts or stadia (Centre and No 1 Courts plus Courts 2 and 3) as well as 28 further outdoor grass courts. There are also all weather hard courts laid on the main site but the number currently available is not clear as tournament hospitality facilities have been installed in the hard courts areas. Additionally, 6 temporary courts are installed annually for the Championships on the croquet lawns in the northernmost parcel within Wi3 adjoining Bathgate Road. If detailed descriptions of the number of courts are required to be included, perhaps the AELTC can be asked to clarify the description and number of courts to be specified to ensure the Plan is accurate?</p>	Amendment proposed to correct the number of tennis courts within site Wi3, having consulted the AELTC to clarify. (18 Championship courts, 14 grass practice courts, 10 clay courts, 10 acrylic courts and 3 croquet lawns within Site Wi3)
375	80		Parkside Residents Association	09 Wimbledon	Site Allocations introduction	page 300	MM116	<p>2.1 The Introduction to the Draft Plan notes at para 1.1.4 p4 that "The Local Plan must be read as a whole document" which suggests, rightly in our view, that a consistent approach should be adopted.</p> <p>Para 1.1.18. p4 also explains the purpose of Site Allocations in the Plan as "Site allocations sets [sic] out land use requirements for sites that will contribute to the borough's growth." Elsewhere in the draft, in chapters referencing different areas of the Borough, (specifically Colliers Wood at p82, Mitcham at p116, Morden at p197 and Raynes Park at p232) the following paragraphs are used to describe in more detail what the Site Allocations' purpose should be "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 a site allocation will be determined against planning policies (including the London Plan)." Whilst each Site identified in the Site Allocations lists has its own summary of existing and potential uses and policy parameters, the framework set out in these paragraphs acknowledges that these Sites are included because of their strategic significance, and the expectation that any redevelopment has a part to play in the delivery of the Borough's wider strategic objectives. The fact that this focus and context is adopted for Site Allocations throughout the Plan (save, inexplicably, for Wimbledon Site Allocations, upon which we comment below) underscores in our view the principle that it is intended that a consistent approach, should be adopted.</p>	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
376	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>4.4 Site description para 6 relevance?</p> <p>The text here refers to the former golf course which is not part of the Site Allocation. The AELTC's planning application 21/P2900 is also mentioned but does not relate to the land within Wi3. The proposals in that application were approved by LB Merton subject to a S106 Agreement and GLA referral. The application was refused by LB Wandsworth and has now been called in for determination by the Mayor of London and could be called in by the Secretary of State. Its outcome is therefore uncertain so it should not be included in the Plan. We also query the inclusion of a narrative reference to the AELTC's "proposal" for the former golf course within Wimbledon Park which at this stage is a commercial aspiration, yet to be validated by any planning permission and which is in any event the subject of separate draft policy provisions in N8.1. On that basis we suggest para 6 is deleted.</p>	Amendment proposed: Factual update proposed to MM115 to update Site description 6
377	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>4.5 Site Location– Impacts ecology designations – green corridor omission LBM29 MM115 and LBM31 p310 The area of MOL to the north of the main site includes a Green Corridor so the statement in response to this question should be "yes" and reference to the Green Corridor reinstated.</p>	No change proposed. The submitted local plan did not contain green corridor in the location described.
378	80		Parkside Residents Association	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road		MM116	<p>Concluding Comment on Consultation Submission from Wimbledon Park Residents' Association ("WPRA") dated 15th March 2024 ("WPRA150324")</p> <p>We have seen this submission which addresses the inclusion of the new Policy N8.1 relating to the future management of Wimbledon Park. We discussed the content with WPRA and with the Wimbledon Society ("WimSoc") who have fully supported WPRA150324 in their own submission to this Consultation dated 19th March. We concur with WPRA's analysis of Policy N8.1 and support the conclusions and recommendations of WPRA150324. Whilst we agree that it is appropriate that a plan for the future management of Wimbledon Park should be established to address its "Heritage At Risk" status we concur with both WPRA and WimSoc that the proposals in policy N8.1 are disproportionate and ineffective. We refer in particular to the clear summary of the challenges in delivering the proposed approach adopted in N8.1 which are listed in Section 5 p15-17 of WPRA150324 and we support the simple alternative suggestion in WPRA150324 Section 1. We note that WPRA also propose amendments to N8.1 should their alternative proposals be rejected. We agree with those amendments.</p>	No change proposed; no main modifications proposed in this part of the representation.
379	81		Patel.D	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364	MM116	<p>Please find below our objection to the modification to Merton's Draft Local Plan</p> <p>Page 363-364 Policy H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows: [image of affordable housing contribution for schemes with 2-9 homes]</p> <p>Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed.</p> <p>Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.</p> <p>In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.</p> <p>As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs.</p> <p>Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a direct effect on the surrounding street scene and in five years' time Merton will look a very different borough from</p>	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .

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380	82		Patel.K	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364	MM116	<p>Page 363-364 Policy H11.1</p> <p>e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable.</p> <p>f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows: [image of affordable housing contribution for schemes with 2-9 homes]</p> <p>Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, the Inspector stated taking a sample of 60 scheme for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed.</p> <p>Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.</p> <p>In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.</p> <p>As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs.</p> <p>Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>Finally, if it becomes too expensive for developers to develop in Merton the small developments down sites dotted around the borough will not get developed.</p>	<p>No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a>.</p>
381	83		Pengue. A	04 Mitcham	Mi16 Mitcham Gasworks			<p>I'm resident in Mitcham, quite close to the gaswork site.</p> <p>I am writing to each of you to ask you to reject once for all the current planning proposal MM62, citing the following reasons:</p> <ul style="list-style-type: none"> <li>•The previous plan was about 9 dwellings and now they have also increased to 10 without any reasonable and thoughtful grounds.</li> <li>•The previous plan proposed was indeed with lower storey height and less dense dwelling and it was rejected by the local community, criticized by several institutions and associations, and also shown as potential -if not eventual- cause of numerous problems.</li> <li>•The surrounding infrastructure (roads, public services, public transport, health services) is already extremely underdeveloped if not collapsing - and the plan here is to add such a huge number of residents without any deep and thorough modification before?</li> <li>•Numerous evidences have been presented to show the risks and the danger of operating in such area without proper procedures and works. All of this seems to be the n-th building/financial speculation just to help friends of friends.</li> </ul> <p>And to be clear, i'm not at all against new buildings - i just ask for a real and honest evaluation about what is going to be built, and against so much evidence, so many facts and above all against true common sense.</p>	<p>No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence and the matter was discussed at the examination in public. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a>) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>.</p>
382	84		Penty. R	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>I am writing to say how very much against the proposal to remove the building height restrictions which do not allow taller buildings than Britannia Point to be built in Colliers Wood.</p> <p>Not only that, but I am also very much against plans to build any more tall buildings i.e. more than 3 floors next to Britannia Point. It is unnecessary and not in keeping with the surrounding area</p> <p>Reasons:</p> <ul style="list-style-type: none"> <li>•Britannia Point is already very dangerous in high winds. I was hurt in a fall during recent violent winds after being blown over near the tower. I have also seen others hurt on other occasions, also someone one killed because of the winds. More tall buildings will exacerbate this danger.</li> <li>•I appreciate there is a need for suitable housing, but as Britannia Point is far from fully occupied, how can it be guaranteed any other buildings will be occupied? As we know, the developers never seem to deliver the type of property they get council agreement to provide. I understand other areas of the borough are not being targeted as is Colliers Wood.</li> <li>•Tall buildings are not in keeping with the current buildings settings but also detrimental to the levels of vital sunlight (which is precious little for 5 months of the year as it does not rise high enough) able to reach surrounding buildings as well as the general area.</li> <li>•How will the surrounding infrastructure be able to sustain more residents when it is already not adequate?</li> <li>•The surrounding area, particularly Wandle Park floods badly, more so in recent years (regardless of the very recent heavy rains). How will building more concrete structures affect the surrounding area in adverse weather - particularly severe wind and rain.</li> <li>•I cannot support strongly enough the views expressed by the Colliers Wood Resident Association particularly the well reasoned arguments regarding how important it is get the right development for the centre of Colliers Wood and more high rises are not the answer. We value our surroundings too much.</li> </ul> <p>They must not be blighted in the proposed way.</p>	<p>Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.</p>
383	85		Pollock B, and I	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>We are writing with our concerns about the latest suggested modifications to the Merton Local Plan, following the examination in public by the planning inspector. We were relieved when the draft Local Plan was originally amended, following an outcry from local residents, to include the stipulation restricting the height of buildings in Colliers Wood. We have lived in Colliers Wood for thirty years and while we welcomed the change in appearance that has been made to the existing tower in recent years, we do not welcome the prospect of more and higher towers in our area. Yet this is the prospect that arises from the planning inspector's recommendation.</p> <p>Britannia Point is completely out of place in Colliers Wood, no other building is nearly as tall, and to develop taller buildings will compound the problem. Lower buildings, while they would still block natural light to a number of areas, could help soften the outline of the Tower and be a positive. A further point is that any building that is over ten storeys uses so much carbon in the building phase that it has unacceptably high embedded energy and carbon, that will take decades to be offset by efficiency gains.</p> <p>The Local Plan requires a huge amount of effort from the residents who respond to the consultation and it is very disappointing to find that our views were not taken into consideration by the inspector.</p>	<p>Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.</p>

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384	86		Purcell, J	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		<p>Developers have just made us aware of this Policy change which is buried away in all the documentation with regards to the Draft Local Plan on the Merton Website – it's easy to see why developers have only just become aware of this policy change as it is hard to locate. Our Planning Consultancy works for a number of small housebuilders in Merton, and they have asked us to email in an objection on their behalf – they will also email in a copy of this objection.</p> <p>Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, the Inspector stated taking a sample of 60 scheme for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed.</p> <p>Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid. In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.</p> <p>As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs.</p> <p>Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if it becomes too expensive for developers to develop in Merton the small developments dotted around the borough will not get developed and regenerated which we are writing to add our support to the attached letter from Merton Park Ward Residents Association.</p>	<p>No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June 2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a>.</p>
385	87		Rayner F&M	05 Morden	Mo1 Morden Regeneration Zone			<p>In previous meetings with Future Merton it has been agreed by the officers that any potential development in Kenley Road car park would be in keeping with the houses backing onto the car park. That is new homes would be a similar height to the existing houses. In particular Daybrook Road.</p> <p>This undertaking should be adhered to.</p> <p>Also the car park is well used. It is full most days. Loss of this amenity would be detrimental to the businesses in Morden.</p>	<p>No change proposed. The concerns raised will be addressed by the following references with the draft local plan: - both paragraph 5.1.34 and part 4 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone' refer to the avoidance of abrupt transitions of building heights and be informed by a design guide or design code. - paragraph 5.1.34: "The scale of existing buildings within the suburban Morden Neighbourhood, is predominantly two storeys in height and therefore the distribution of new height and density should be located to respond to the height of the existing properties and to minimise undue impact on these properties." - part 5 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone': "The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter." - part 7d. of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone' requires proposals to include "appropriately managed and sustainable car parking, ...".</p>
386	88		Resident live next to Gaswork	04 Mitcham	Mi16 Mitcham Gasworks		MM62	<p>Objection to MM62 (Mitcham gaswork site) We are all resident of Portland Road and Street near the Gaswork written to you today We would like to say that a Street Audit was sign from all of us and been handed to our MP Siobhain McDonagh express clear our objection to MM62 Mitcham Gaswork. Lots email and 600 signature was been delivery to all of you toward our MP and been go throw your email We believe that all of us was Stongly disagree about the 9 storey so now we do not understand what is the reason to even increase more. The plan was 200-400 home and with no explanation, reason or evidence justifying the increase in such a building that are not fit in the area, are to tall and far to dense. In one of your point you frase "Reflect Local Aspiration", as we all concern all resident in merton and from all resident live next to the Gaswork as the street audit show is to Strongly Reject the MM62 plan</p>	<p>No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence and the matter was discussed at the examination in public. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a></p>
387	89		Residents Association of West Wimbledon	08 Wimbledon Park	N8.1 Wimbledon Park	275	MM112	<p>We note the inclusion of a new chapter on Wimbledon Park (Policy N8.1) setting out the policies for all 3 parts of Wimbledon Park MOL (AELTC, Council and Wimbledon Club owned) which fall within the borough. This is supported in principle. We will leave those better qualified to do so to comment on the detail.</p>	Support welcomed.
388	89		Residents Association of West Wimbledon	09 Wimbledon	N9.1 Wimbledon	267	MM107	<p>Object to addition of "Supporting tall buildings within Wimbledon Town Centre" which is inconsistent with the limit of 6 storeys supported by local residents</p>	No change proposed. Matter discussed at length at the Local Plan hearings.
389	89		Residents Association of West Wimbledon	01c Urban Development vision and objectives	Spatial vision	32	MM10	<p>We strongly support inclusion of this new bullet point: 'Have protected and improved access to the borough's Metropolitan Open Land (MOL), parks and open spaces, and have protected and enhanced biodiversity and areas of nature conservation.'</p>	Support welcomed
390	89		Residents Association of West Wimbledon	06 Raynes Park	RP3 Burlington Road	229	MM93	<p>Support inclusion of "Development proposal should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor, facilitating biodiversity net gain and providing a significant improvement to the green corridor."</p>	Support welcomed.
391	89		Residents Association of West Wimbledon	06 Raynes Park	RP3 Burlington Road	233	MM95	<p>Object to addition of this point on the approach to tall buildings "The site could include a range of tall buildings up to an appropriate upper limit of circa 52m (approx. 15 storeys). 15 storeys would be totally out of keeping with its setting and seems at odds with the rest of the policy which supports use of community engagement and preparation of design codes to guide what might be appropriate for the site.</p>	No change proposed. Planning permission 19/P2387 was granted on appeal in June 2021 for a development from 6 to 15 storeys and the site is under construction. One of the council's stated reasons at appeal for not supporting the proposal was its effect on the character and appearance of the area.
392	89		Residents Association of West Wimbledon	08 Wimbledon Park	N8.1 Wimbledon Park	269 and 275	MM110 and MM111	<p>In the Wimbledon Policies section we support the changes below. The previous wording would have been inconsistent with the designation of all of Wimbledon Park as MOL. [officer notes: please see original response which includes an extract of MM110 (Wimbledon policy N9.1 part (g)) on page 269 and MM111 (paragraph 9.1.35) on page 275]</p>	Support welcomed.
393	89		Residents Association of West Wimbledon	09 Wimbledon	N9.1 Wimbledon	268	MM108	<p>Object to removal of the words 'reduce severance with new bridges over the railway'. It has long been recognised that the dependence on the single bridge over the railway leaves the centre of Wimbledon vulnerable to major disruption, forces a large volume of vehicles through the town centre/public transport hub and severely limits options for pedestrianisation</p>	No change proposed. There is no evidence of deliverable proposals for additional bridges within the lifetime of this local plan.
394	89		Residents Association of West Wimbledon	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	282	MM116	<p>In the Wimbledon Site Allocations section we support the removal of the former Wimbledon Park Golf Course as part of Site Wi13: All England Lawn Tennis Club, Church Road. It is a part of Wimbledon Park and plans for its future have to be considered in that context.</p>	Support welcomed.
395	89		Residents Association of West Wimbledon	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	387	MM213	<p>f. Object to removal of 'Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens.' This needs to be clear that the policy on levels of light to neighbouring properties includes light to the neighbouring gardens. Loss of light to gardens is a very common and justified cause of concern for those living next to proposed developments. These words are not repetition. They are required for clarity that would not be achieved with the proposed revisions to 12.3 g</p>	No change proposed. National policy (NPPF para 16) prevents unnecessary repetition in local plans and the issue of acceptable light and privacy levels for existing and future residents and requiring a high standard of amenity for the development and its surroundings is also addressed in the same policy, point (g).



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396	89		Residents Association of West Wimbledon	12 Places and Spaces	D12.3 Ensuring high quality design for all developments		MM213	Object to the removal of 'Development proposals affecting a heritage asset or its setting will be assessed against: ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study' These guides are a very useful tool for any developer or property owner considering new development or modifications to properties in and around a conservation area. A lot of work has gone into them.	No change proposed. The council agrees on the usefulness and importance of Merton's Borough Character Study and Merton's Conservation Area Character Appraisals; however planning policies cannot require applicants to assess proposals against planning guidance (that the council could subsequently amend without independent examination) Therefore all references to planning guidance (e.g. the Borough Character Study, Future Wimbledon SPD, conservation area character appraisals) have been removed from planning policies and referenced in supporting text as a useful source for applicants and decision-makers
397	89		Residents Association of West Wimbledon	12 Places and Spaces	D12.11 Basements	12.10.19	MM116	Object to the inclusion of a new phrase saying that basements <i>will be supported</i> in conservation areas. Suggest replacement with <i>will only be supported if</i> . It should be the exception rather the rule that basements will be supported in conservation areas. Basements can have negative impact on the appearance (light wells) and structure of buildings.	No change proposed. Not necessary for the soundness of the plan
398	89		Residents Association of West Wimbledon	14 Infrastructure	IN14.1 Infrastructure	14.1.5 page 484	MM116	[officer note: see original response for paragraph 14.1.5 of LBM31] We propose further amendment to this paragraph to make clear that the Council will not only work with the water and waste water authorities to ensure adequate drainage infrastructure to cope with new developments but also to ensure that capacity meets existing needs. Drainage capacity is not currently adequate in all parts of Merton. West Wimbledon, and especially the Raynes Park local centre, has suffered from repeated surface water flooding. There is a lot of catching up to do.	No change proposed. New developments are not required to rectify all problems with existing water and wastewater capacity in the borough. Separately the council is undertaking a Local Flood Risk Management Strategy and a Surface Water Management Plan and is working with the Environment Agency, Network Rail and Thames Water on a flood
399	89		Residents Association of West Wimbledon	15 Green and Blue Infrastructure	O15.4 Protection of Trees, Hedges and Other Landscape Features	541-542 parts e and f	MM116	Suggested amendment to e. and f. - Instead of just considering the <i>amenity value</i> of trees proposed for removal and replacement trees both the <i>amenity and ecological value</i> of the trees should be considered. Suggested addition to f. - 'consist of appropriate species native to the UK and of a trunk girth that matches the girths of the lost trees'. Replacing mature trees lost to make way for development with an equal number of young trees will reduce tree canopy cover and not be of equal amenity and ecological value. There needs to be some guidance in the plan on how the 'value' of the trees will be measured. The MM as currently proposed is: [officer note - see original representation for extract of Policy O15.4 part e and f]	No change proposed. In paragraph 15.4.3 it is stated "When considering the amenity value of a tree, we will look at Category A, B and lesser category trees where they are considered to be of importance to amenity and biodiversity, as defined by BS 5837:2012 (in accordance with the London Plan G7C)." and the proposals to include references to trunk girth for replacement trees, was considered at the Inspectors' hearing sessions in October 2022 (see Matter 10) and no modifications were proposed to change the approach from using British Standards.
400	89		Residents Association of West Wimbledon	19 Policies Map	MOL-05-Copse Hill map illustrating boundary change		MM116	It is unclear why the very small change is proposed at top right of the plan. The text makes no mention of it. There was nothing in 13/P2722 or 16/P4853 that affected this corner of the MOL. [officer note: see original representation for extract of MOL-05 Copse Hill map with small illustration at northernmost point]	No change proposed. Please see document LBM18D3 Metropolitan Open Land Policies Map summary of changes <a href="https://www.merton.gov.uk/system/files/18D3%20Metropolitan%20Open%20Land%20Policies%20Map%20summary%20of%20changes%202014-2021.pdf">https://www.merton.gov.uk/system/files/18D3%20Metropolitan%20Open%20Land%20Policies%20Map%20summary%20of%20changes%202014-2021.pdf</a> dated November 2021. Page 6 sets out the site assessment against the MOL criteria from the London Plan 2021 when considering the new built form of the site
401	89		Residents Association of West Wimbledon	19 Policies Map	MOL-05-Copse Hill map illustrating boundary change		MM116	All references to the Wilson Hospital should be removed. The other 'hospital' site that has been redeveloped, and has a boundary with the Copse Hill MOL is the Wolfson Rehabilitation Centre. There is no MOL within the Wolfson redevelopment. The following amendments are required: 1. The Copse Hill MOL is located within the Wimbledon Neighbourhood. It includes Morley Park and other green spaces around the Atkinson Morley Hospital and former Wilson Hospital residential development. 2. The physical boundaries include: - North - Built form at Atkinson Morley and the former Wilson Hospital Wolfson Rehabilitation Centre' 3. The built form of the new developments at Atkinson Morley and the former Wilson Hospital Wolfson Rehabilitation Centre sites set the physical boundaries of the northern edge of this MOL	Amendments proposed to MM353 in line with this representation.
402	89		Residents Association of West Wimbledon	General comment - Whole Plan			MM116	Please find below comments from the Residents' Association of West Wimbledon (RAWWW) on the proposed Main Modifications. Our comments are primarily on: 1. The policies which we rely on most to protect and improve our area which includes a large area of MOL, several conservation areas and SINCs, and is prone to surface water flooding. 2. The sites in our area, and those nearby which are of interest to our residents We refer to each of the Main Modifications we comment on by the MM number and page as in the document titled 'Schedule of Main Modifications'.	No change proposed; no main modifications identified for review in this part of the representation.
403	90		Richardson. M	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	I understand the Planning Inspectorate has proposed removing the clause which states that no building taller than 19 storeys shall be built in Colliers Wood. I agree with our MP Siobhan McDonagh and local councillors, Laxmi Attawar, Caroline Cooper-Marbiah and Stuart Neaverson that this is not necessary and would be to the further detriment of Colliers Wood. The one high rise we already have, Britannia Point, is completely out of character with our neighbourhood and is not fit for its purpose and has been in various states of disrepair since it was refurbished. I trust you will consider the views of the local community before a decision is made.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
404	91		Roxburgh Asset Management Ltd	09 Wimbledon	N9.1 Wimbledon			I write on behalf of our client Roxburgh Asset Management Ltd who has been in discussions with the Council in respect of the redevelopment of the Integra House site on Alexandra Road, Wimbledon (Appendix 1). Our client would like to comment on the Main Modifications consultation in relation to building height in Wimbledon town centre (Policy D12.6, primarily). We would be grateful if these comments could be passed to the Inspectors for their consideration. This letter specifically comments on the following modifications: - Modification of text of Policy D12.6; - Strategic Heights Diagram, Wimbledon Town Centre.	No change proposed; no main modifications identified for review in this part of the representation.
405	91		Roxburgh Asset Management Ltd	12 Places and Spaces	D12.6 Tall Buildings			Alexandra Road Buildings (the 'Buildings') The buildings (including Integra House and its flanking buildings) are enclosed by the 'block' of Alexandra Rd (south-east side), Wimbledon Hill Road and Orinoco Lane and are located in the most sustainable location within the town centre, being directly adjacent to Wimbledon Station. Whilst the buildings are covered by the Crossrail 2 Safeguarding Direction, discussions with Transport for London ("TfL") suggest that objections are unlikely to be raised to the development of the buildings (including Integra House and its neighbours) provided that agreement is reached separately to allow TfL to acquire them should Crossrail2 come forward in future. That will include agreement that their use is restricted to single tenure uses (i.e. avoiding multiple demise residential use). As such, the buildings are available for development now and for uses which are suitable for the town centre location, including commercial uses and single-ownership residential uses, such as large-scale Build to Rent and Student Housing. Discussions are progressed with the planners for the development of the Integra House site for such uses, including the potential for a 'tall building' within the definition of D12.6. The buildings are located within the 'yellow' zone shown on the Strategic Heights Diagram, Wimbledon Town Centre. [officer comment: see original representation which shows an extract of the Strategic Height Diagram in Wimbledon town centre D12.6 edited to show the location of the representative building] The Main Modifications identify the 'yellow zone' as being the "indicative location of tall building cluster where buildings of circa 40m* could be appropriate, subject to all policy requirements". The associated note clarifies that this is height from ground level.	No change proposed - no amendment proposed by the representation

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406	91		Roxburgh Asset Management Ltd	12 Places and Spaces	D12.6 Tall Buildings			<p>Interaction with Future Wimbledon SPD</p> <p>With the above further modifications, Policy D12.6 and the accompanying Strategic Heights Diagram, Wimbledon Town Centre will provide an appropriate strategy for planning for tall buildings in the Borough and, specifically, in Wimbledon Town Centre.</p> <p>The approach to appropriate heights in Wimbledon Town Centre updates (and, in places, supersedes) the guidance provided in the Future Wimbledon SPD in this regard. The Strategic Heights Diagram, Wimbledon Town Centre, for example, shows that a greater amount of development is likely to be supportable in Wimbledon Town Centre through the acceptance of greater height which is not envisaged or supported by the SPD.</p> <p>As such, the removal of references to the SPD in D12.6 is welcomed as it removes ambiguity as to the relationship of the SPD with the development plan itself.</p> <p>We suggest an additional modification to the supporting text to Policy D12.6 which would provide necessary clarification:</p> <p>"In the case of tall buildings within the areas shown in the accompanying Strategic Heights Diagram, Wimbledon Town Centre, regard should be had to the Future Wimbledon SPD as a strategy for development of the town centre, only where the guidance in the SPD accords with Policy D12.6".</p> <p>The above additional modification is necessary to ensure proper interpretation of the Tall Buildings policy in respect of proposals in Wimbledon town centre</p>	Amendment proposed to the indicative boundaries within the Strategic Heights Diagram to better align with the evidence including the Future Wimbledon SPD and to remain within the town centre boundary for clarity and accuracy.
407	91		Roxburgh Asset Management Ltd	12 Places and Spaces	D12.6 Tall Buildings			<p>Conclusion</p> <p>Whilst the additional flexibility in terms of the assessment of 'appropriate' height of tall buildings is generally welcomed to bring conformity with the London Plan, it is necessary to consider additional modifications (as described above) to ensure an appropriate strategy for Tall Buildings is provided by Policy D12.6 in respect of development in Wimbledon town centre.</p> <p>We ask that the Inspectors take these representations into account and consider whether further discussion is required on these points prior to the close of the Local Plan Examination.</p> <p>Please do not hesitate to contact me should you require any clarification on any aspect of the above.</p>	No change proposed - no amendment proposed by the representation
408	91		Roxburgh Asset Management Ltd	12 Places and Spaces	D12.6 Tall Buildings			<p>General Comment on Main Modifications for Wimbledon Town Centre (Tall Buildings)</p> <p>Generally, the modification in the Strategic Heights Diagram, Wimbledon Town Centre is welcomed as it is necessary to align the policy with London Plan Policy D9A in terms of requiring the borough to consider what height may be 'appropriate', rather than to set an absolute upper cap on building height within a specific location. The introduction of flexibility with the introduction of the word 'circa' in both the yellow and red areas is additionally welcomed as it recognises that appropriate heights for buildings will need to be considered on a site-by-site basis. Despite welcomed move away from a prescriptive 'cap' to buildings heights, the policy should, however, go further and make it clear that appropriate height within Wimbledon Town Centre may vary relatively significantly on a site-by-site basis when the criteria of Policy D12.6 and London Plan D9 are applied along with all other material considerations. We therefore suggest a further modification to Policy D12.6 which clarifies how the Strategic Heights Diagram, Wimbledon Town Centre (and other locations) is to be interpreted within the context of the second part of D12.6 when assessing proposals for tall buildings within the areas where tall buildings are acceptable. In particular, Policy D12.6 should include wording to the effect that: "Tall buildings will generally be supported in Wimbledon Town Centre (identified by D12.6 Part 1 (b) having regard to the indicative location of tall building clusters for varied height in the town centre area. Primarily, the tallest buildings should be located in the area around Wimbledon Station. The indicative strategic areas for height in Wimbledon Town Centre are on the Strategic Heights Diagram, Wimbledon Town Centre. Appropriate height on specific sites within the cluster(s) will be considered on a site-by-site basis according to all other considerations under this second part of Policy D12.6.</p> <p>Omission of this wording leaves it somewhat ambiguous as to how the yellow and red zones in the Strategic Heights Diagram, Wimbledon Town Centre are to be applied within 'the four corners' of the policy itself. This is particular to the Wimbledon Town Centre area because it includes two different height zones all (presumably) within the area defined by D12.6(1)(b).</p> <p>This ambiguity is increased by the fact that the yellow and red zones in Wimbledon Town Centre are drawn indicatively in that they denote only general areas. The above suggested amendment will assist the interpretation of Policy D12.6 in cases where, for example, a building is partially within and partially outside either specific zone. It also provides definition in policy as to the spatial strategy for tall buildings in the town centre, to be focused around the station.</p>	Amendment proposed to the indicative boundaries within the Strategic Heights Diagram to better align with the evidence including the Future Wimbledon SPD and to remain within the town centre boundary for clarity and accuracy.
409	91		Roxburgh Asset Management Ltd	12 Places and Spaces	D12.6 Tall Buildings			<p>Location of the Specific Clusters</p> <p>The 'red cluster' shown in the Strategic Heights Diagram, Wimbledon Town Centre should be modified in area to include those sites and areas which are potentially capable of coming forward up to heights of 'circa 48m' once the modified criteria of D12.6(2) are met.</p> <p>This should include the extension of the 'red cluster' across the buildings between Alexandra Road and Orinoco Road, owing to the fact that:</p> <ul style="list-style-type: none"> <li>- Development of these buildings would be seen and experienced in the context of the consented St George's Centre development (Merton Ref. 21/P3163 Appendix 2) which allows for a substantial building of in excess of 50m in height at the southeast corner of the junction of Alexandra Rd / St Georges Rd with Wimbledon Hill; the opposite side of the road to the Buildings;</li> <li>- The location of the Buildings, having the closest relationship with Wimbledon Station as a hub and as the most accessible part of the town centre, suggesting this to be an appropriate location for the most dense forms of development;</li> <li>- The lack of existing architectural quality, the existing buildings' detract from local character and the potential for development of the Buildings to improve the character and appearance of the locality. There is, for example, a strong opportunity for 'exemplary' buildings to come forward;</li> <li>- No potentially greater impacts upon heritage assets and views than consented development and the proposed 'red cluster' adjacent;</li> </ul> <p>The general lack of other constraints, including the potential to achieve density (with height) without significant or unacceptable impacts upon residential neighbours.</p> <p>As it stands, the delineation of the 'red' and 'yellow' clusters appears entirely arbitrary in respect of this part of the town centre and the diagram should be modified to include the Buildings within the 'red cluster', i.e. potentially appropriate for the tallest buildings within the town centre, subject to assessment.</p>	No change proposed - amendments proposed are not justified and not necessary for the soundness of the plan.
410	91		Roxburgh Asset Management Ltd	12 Places and Spaces	D12.6 Tall Buildings			<p>I write on behalf of our client Roxburgh Asset Management Ltd who has been in discussions with the Council in respect of the redevelopment of the Integra House site on Alexandra Road, Wimbledon (Appendix 1).</p> <p>Our client would like to comment on the Main Modifications consultation in relation to building height in Wimbledon town centre (Policy D12.6, primarily). We would be grateful if these comments could be passed to the Inspectors for their consideration.</p> <p>This letter specifically comments on the following modifications:</p> <ul style="list-style-type: none"> <li>- Modification of text of Policy D12.6;</li> <li>- Strategic Heights Diagram, Wimbledon Town Centre.</li> </ul> <p>Alexandra Road Buildings (the 'Buildings')</p> <p>The buildings (including Integra House and its flanking buildings) are enclosed by the 'block' of Alexandra Rd (south-east side), Wimbledon Hill Road and Orinoco Lane and are located in the most sustainable location within the town centre, being directly adjacent to Wimbledon Station. Whilst the buildings are covered by the Crossrail 2 Safeguarding Direction, discussions with Transport for London ("TfL") suggest that objections are unlikely to be raised to the development of the buildings (including Integra House and its neighbours) provided that agreement is reached separately to allow TfL to acquire them should Crossrail 2 come forward in future. That will include agreement that their use is restricted to single tenure uses (i.e. avoiding multiple demise residential use).</p> <p>As such, the buildings are available for development now and for uses which are suitable for the town centre location, including commercial uses and single-ownership residential uses, such as large-scale Build to Rent and Student Housing. Discussions are progressed with the planners for the development of the Integra House site for such uses, including the potential for a 'tall building' within the definition of D12.6.</p> <p>The buildings are located within the 'yellow' zone shown on the Strategic Heights Diagram, Wimbledon Town Centre. [Image showing the location of Alexandra Road Buildings in the Strategic Heights Diagram]</p> <p>Location of the Alexandra Road Buildings (the 'Buildings')</p> <p>The Main Modifications identify the 'yellow zone' as being the "indicative location of tall building cluster where buildings of circa 40m* could be appropriate, subject to all policy requirements". The associated note clarifies that this is height from ground level.</p>	No change proposed - no amendment proposed by the representation
411	92	Said		03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	<p>In reference of below email; I agree to change the wording regarding the site allocated CW2 in Colliers Wood, the is no justification why the current Britannia point has be the pinnacle building, perhaps they should form a different size off tall buildings, designed led, as the land there is like an island in the centre of CW. This land should be used to the maximum to accommodate the housing needs in London, especially that the land is like an island. Having tall buildings and shops on the ground floors will help have more buzzing feels in Colliers Wood.</p>	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
412	92	Said		07 South Wimbledon				<p>Another example, South Wimbledon station have a huge retail shop that is has been empty for years, this shop can be rented by Gails or Pret a manger for example, and serve an entire population in CW and South Wimbledon!</p>	No change proposed, amendments not necessary for the Plan's soundness.

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413	92		Said	03 Colliers Wood	CW2 Britannia Point land south of			There are empty lands that aren't being used especially with the housing demands and lack of lands, like CW1 site, CW3 site the community centre, and the CW5 site which can be used to develop entire news streets and building and having these shops on the ground floor. The current parking area is an eyesore!  I hope I can help the community in CW and South Wimbledon, and work with Merton Council as one of their Area Development team members, I have many ideas that I would love to share and work with Merton to have a positive change in the high streets of Colliers Wood and South Wimbledon.  Merton High Street towards South Wimbledon station needs a complete change in the shop's front façade and the feel of the street, it is rundown. Perhaps maybe approaching all the owners in the Merton High street and provide them with an incentive to work on their façade or approach investors, shops to have presence in the area and that will lead to change the high street, also work on changing the basements... I know that the High Path regeneration plan will deliver some of it, but the area from Sainsburys towards the High Path needs investment.  Part of Colliers Wood high street basements has been renovated with the façade years ago, and this approach is a good idea to be done for the remaining parts of the high street towards CW station, and in Merton high street!	No change proposed
414	92		Said	07 South Wimbledon					No change proposed. [separate to the Local Plan the council is operating a shopfront façade repair programme funded by contributions from developments known as Community Infrastructure Levy. Merton High Street is on the list of shopping parades to benefit (see example of completed projects in Colliers Wood)]
415	93		Savill .J	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	I am writing to express my concern over the proposed removal of the clause stating that no building taller than 19 storeys can be built in Colliers Wood. I wish to object in the strongest terms to this proposal.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
416	94		Sellars.A	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f.Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		I would like to raise an objection to LBM29 Schedule of Main Modifications to Merton's Draft Local Plan – January 2024. Page 363-364 Policy H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows: [image of the affordable housing requirement for schemes of 2-9 homes] Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legal, the Inspector stated taking a sample of 60 scheme for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.  As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid. In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3. As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs.  Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from I would like to register my extreme disapproval of the potential creation of new residential buildings (particularly high rise) in an area where there appear to be no simultaneous plans to expand the existing infrastructure (ie schools, GPs etc).	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June 2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
417	95		Shaw, I	12 Places and Spaces					No change proposed. The Plan is supported by evidence on infrastructure needs and contains policies to support the delivery of infrastructure necessary to make new development acceptable in planning terms.
418	96		Sheridan, K	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	I'd like to object to your proposal to remove the height restrictions for the local plan. Even 19 stories is too high. It blocks sunlight, creates significant wind tunnels (which should have been addressed in the previous building but gets ignored despite the continued property damage to local houses) and leads to high density living that the council can't support. You need to build sustainable dwellings and not the highest ones. Ideally ones where lifts work, and windows don't fall out. We want homes that people want to stay in and create a community, not live in for a few months and then leave because it's cramped and shoddily built.  When you couldn't pull down the existing building because of risks to the tube, how do you propose to build something higher without putting people at risk?  This should be the same level of buildings as per permissions given for the AFC Wimbledon stadium, with emphasis on sustainability and shared ownership for front line workers, green space and wind breaks.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
419	97		Singlegate Primary School	03 Colliers Wood	CW2 Britannia Point land south of		MM39	Singlegate Primary School is a three form of entry Primary School with over 600 pupils, serving the local community of Colliers Wood. We are grateful for this opportunity to comment on the proposed modifications to the draft Local Plan arising from the Planning Inspectors Examination in Public. We are confining our comments to the proposed amendment to the site brief for CW2, the car park adjacent to Britannia Point – specifically, Major Modifications MM39. Major Modification MM39 removes the stipulation in the current Local Plan that "the existing Britannia Point building should remaining the pinnacle in terms of height".  The importance of site CW2 to Colliers Wood Because it falls within an Opportunity Area and has been designated as suitable for tall buildings, CW2 is the most important site in Collier's Wood. The development of the site will affect the amenity of the Town Centre and the quality of life of those who live, work in and are educated around it for decades to come. For this reason, it is vital that the new Local Plan encourages development that enhances the character, amenity and environment of the town centre and protects against the blight that would accompany over-intensive development of the site. An explicit limit on the height of any new buildings is an obvious and unambiguous way to safeguard the quality of life in the town centre and surrounding neighbourhood.  Loss of natural light The school's main concern is about the loss of natural light. Colliers Wood is not a dense urban area. Britannia Point excepted, the townscape is predominantly low rise. The school is located extremely close to Britannia Point and site CW2. Any additional building on CW2 which was higher than Britannia Point would inevitably cast a significant shadow on the school and its playground areas. It would deprive many of the rooms in the school of daylight and sunlight. Natural light is essential in promoting healthy lifestyles and learning for children, especially at such a young age. Any development of the site should aim as far as possible to preserve the existing daylight and sunlight values of the town centre and surrounding area. A tower higher than Britannia Point would do completely the opposite. Please take this into account in considering the Merton draft Local Plan.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
420	98		Sport England	17 Monitoring Framework	Table 17.1 Monitoring Framework		MM350	My comments are as follows; Local Plan Monitoring Framework – page 125 of 126 (Schedule of Modifications) Topic 14 This includes the monitoring indicator (b) 'Developments completed resulting in a loss or gain of sports and recreation facilities' But there is no associated target/trigger for action contingency for each topic area. It is recommended that this is all added. A possible target indicator could be; Number of planning permissions granted that include new or improved sports facilities and the number resulting in a loss. I have no further comments	Amendment proposed to add target, trigger for action and contingency to Section 14 of the monitoring table relating to the monitoring of policy IN14.3 sport and recreation

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421	99		Swifts Local Network: Swifts & Planning Group	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	para 15.3.19 page 515	AM281	Regarding Additional Modification ref. AM281 (page 515, ref. 15.3.19), the proposed Additional Modification is very welcome in principle but includes an incorrect link to a non-relevant web page, and we propose that instead of referring to the 'Swift Conservation Group' which we assume is a typo as this organisation does not exist, reference is made instead to the British Standard.  Therefore, the new sentence would be as follows, with proposed websites to be linked to in square brackets: "... Applicants will be expected to provide details of such features as part of planning applications and should refer to best practice guidance when designing a development, including that prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM) [https://cieem.net/resource/the-swift-a-bird-you-need-to-help/] and the British Standard BS 42021 for integral nest boxes [https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard]." I understand that Wimbledon Swifts Group are making a submission with the same aim.	Amendments proposed. MM281 is proposed to be amended with updated hyperlinks and text as recommended: "Applicants will be expected to provide details of such features as part of planning applications <b>and should refer to best practice guidance when designing a development, including that prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM) and the British Standard BS 42021 for integral nest boxes.</b> "
422	100		TfL Places for London	03 Colliers Wood	CW1 Baltic Close		MM35 – Site Allocation CW1, Design and accessibility guidance	Previous versions of the Local Plan stated that site allocation CW1: "may be required to make provision for docking areas for cycle/ scooter hire schemes". Places previously commented that a requirement for site allocation CW1 to include a docking area is considered overly onerous given the scale of the site. It is noted that the main modification now specifies that: "Consideration should be given to the feasibility of providing publicly accessible secure cycle parking and / or docking areas for cycle or scooter hire schemes on this site at ground level, either as part of any development or if development does not take place." This wording is considered more responsive to the site context and provides more clarity than the previous wording, as such this amendment is supported.	Support welcomed
423	100		TfL Places for London	03 Colliers Wood	CW4 Colliers Wood Station		MM49 – Site allocation CW4, Design and accessibility guidance	Previous versions of the Local Plan stated that site allocation CW4: "may be required to make provision for publicly accessible cycle storage hub or docking". Places previously commented that a requirement for CW4 to include a docking area is considered overly onerous given the scale of the site. It is noted that the main modification now specifies that: "Redevelopment of the station should make provision for an appropriate amount and type of cycle storage for commuters and/ or provision of docking stations for cycle/scooter hire schemes in proximity to the public highway." As per our previous response at Regulation 19 and to Matter 8, a requirement for this site to provide cycle storage and/or a docking area is considered overly onerous given the scale and constraints of the site. It is suggested that the wording is amended to the following, which is consistent with other similar sites: "Redevelopment of the station should make provision for Consideration should be given to the feasibility of providing an appropriate amount and type of cycle storage for commuters and/ or provision of docking stations for cycle/scooter hire schemes in proximity to the public highway."	No change proposed. Colliers Wood is part of the cycle superhighway 7 and existing cycle parking and storage is over capacity. Redevelopment of CW4 can make provision for additional cycle parking capacity to promote active travel in line with the London Plan.
424	100		TfL Places for London	05 Morden	Mo1 Morden Regeneration Zone		MM67, MM73, MM84 – Policy N5.1, Site Allocation M04 and supporting text	These policies now note that where sites are considered to be large sites (0.25 hectares or above) that they should have regard to the vision, objective and principles set out in the Strategic Development Framework and where they do this, they can be brought forward at any time in the plan period.  The Statement of Common Ground between Places (previously TfL Commercial Development) and LB Merton states that: <i>Both parties agree that, to enable incremental development that assists the delivery of comprehensive regeneration and avoids fragmented development and suboptimal densities in this highly accessible location, all proposals within the Morden Regeneration Zone will be expected to support the vision as set out in the site allocation Mo1. Clarity regarding the use of the phrase 'comprehensive regeneration' is improved with proposed additional modification AM5 (Ref. 0D4b) to paragraph 5.1.18, which introduces the sentence: "References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method." and the inclusion of the phrase "and landowners are strongly encouraged to work together" to this paragraph, as main modification MM5.1b, will ensure that the plan in positively prepared.</i>  This reflects the nature of the opportunity here which needs an element of comprehensive development in order to maximise the potential of the town centre. It is not considered that the policy should be so specific in terms of site size, this could incentivise sites being brought forward in different phases to avoid having to factor in a more comprehensive approach. Even smaller developments could have an impact on the ability of the wider area to deliver optimised and comprehensive development which realises meaningful regeneration of the town centre. It is felt that the previous wording provided a suitable balance between enabling individual sites to come forward where they were ready if other sites weren't at that stage and sites being progressed for development in isolation that could stymie wider development potential.	No Change Proposed. These modifications were proposed as part of the council's response to Matter 15, Issue (i), Question 1 from the Planning Inspectors, before the public hearings in June 2022. Matters regarding the Morden Regeneration Zone, were discussed at the Planning Inspectors' public hearings in June 2022 and in September 2022.  The draft local plan, as proposed to be modified, enables the planning authority to resist development proposals on small sites (<0.25ha) within the Morden Regeneration Zone that would hinder the delivery of comprehensive regeneration and enable the planning authority to require applicants for proposals on large sites (>0.25ha) to demonstrate that their proposals would not hinder the delivery of comprehensive regeneration- see some relevant extracts below ( <i>here with underlining for emphasis</i> ):  - Policy N5.1 part a. "...Development Proposals for large sites (0.25 hectares and above) that contribute to the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo1, will be supported." - Part 1 of the 'Design and accessibility guidance' within proposed site allocation Mo1 'Morden Regeneration Zone': <i>"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."</i>
425	100		TfL Places for London	11 Housing			MM191: New paragraph below 11.7.4	It is noted that the following wording has been inserted in the supporting text section of the Built to Rent policy: "A clawback mechanism will be applied in accordance with London Plan policy and national Planning Practice Guidance (PPG) on Build to Rent to protect the value of affordable housing provision that is withdrawn if housing units in Build to Rent blocks are converted to another tenure after the expiry of the covenant period." It does not appear that the reference to 'after the expiry of the covenant period' is in line with the London Plan 2021 which defines the Built to Rent Clawback as follows (pg. 499): "A payment to the relevant Local Planning Authority for the provision of affordable housing in the event that the Build to Rent Covenant is broken through the sale of units out of rented tenure within the covenant period." This London Plan definition refers to 'within the covenant period' rather than after the expiry of the covenant period, and so it is suggested the policy is amended to ensure consistency with the London Plan.	Amendment proposed to MM191 will ensure better consistency with the London Plan. Amendment proposed as follows: <b><u>A clawback mechanism will be applied in accordance with London Plan policy and national Planning Practice Guidance (PPG) on Build to Rent to protect the value of affordable housing provision that is withdrawn if housing units in Build to Rent blocks are converted to another tenure within the covenant period.</u></b>
426	100		TfL Places for London	12 Places and Spaces	D12.6 Tall Buildings		MM239 and MM249: Policy D12.6 Tall Buildings, and supporting text	We support the addition of the following text which creates a sensible approach to management of tall buildings within a wider context: "In instances where an applicant is proposing the redevelopment of a site immediately adjacent to the tall building boundaries and clusters identified in the Strategic Height Diagrams, local Design Guides or Design Codes may be used as part of a robust design-led approach to demonstrate the appropriate stepping up of heights above or below those stated and avoid abrupt transitions in building heights." However, we note that Colliers Wood is not referenced in the areas where tall buildings are acceptable and has been removed from the map identifying areas appropriate for tall buildings, but it is not clear why it has been removed. In paragraph 3.1.18 and Site allocation CW2 it is noted that this site may be an appropriate location for tall buildings. As such the map of appropriate locations for tall buildings should be reinstated to show Colliers Wood as a location suitable for tall buildings given London Plan Policy D9: Tall buildings which requires that boroughs should determine if there are locations where tall buildings may be an appropriate form of development and any such locations and appropriate tall building height should be identified on maps in Development Plans.	No change proposed. Only one site in Colliers Wood is considered suitable for tall buildings (site allocation CW2). As such, MM239 to policy D12.6 "Tall Buildings" lists this specific site CW2 under part (d) <i>Tall buildings are only acceptable in the following locations... (d) where they are identified in the following site allocations: CW2, ... etc.</i> This is also clear from the policies map.

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427	100		<b>TfL Places for London</b>	General comment - Whole Plan				<p>Places for London ('Places') is pleased to provide its views on the Council's proposed Main Modifications following the recent EIP and Inspector's Post Hearing Letter. Please note that the views expressed in this letter and attachments are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. 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.</p> <p>Places for London Places is TfL's new and financially independent property company, formerly known as TTL Properties and TfL Commercial Development. We provide space for over 1,500 businesses in TfL stations and railway arches, as well as on London's high streets. We are working to develop TfL's surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations, and to create excellent places to live, work and play which are sensitive to local needs and communities, and which are accessible to all.</p> <p>We have previously responded (as TfL Commercial Development and TTL Properties) to the Issues and Options consultation (January 2018), the Regulation 18 stage 2 (January 2019), Regulation 18 (January 2021) and the Regulation 19 draft policies consultation (September 2021). Our current representations should be read alongside our previous responses. We are pleased that Places has a very good working relationship with Merton Council and in May 2022 we entered into a signed Statement of Common Ground (Examination doc ref: OD13p). Our comments below reference this document.</p> <p>Main Modifications Generally, we consider the draft Plan to be positively prepared and sound, except for areas where we have raised concerns in respect of the Main Modifications below.</p>	Support welcomed.
428	101		<b>TfL Spatial Planning</b>	05 Morden	Mo4 Chaucer Centre	5.1.23	MM74	We welcome clarification that where appropriate development proposals may be required to make financial contributions towards the delivery of bus stand and bus stop facilities, in the form of planning obligations.	Support noted
429	101		<b>TfL Spatial Planning</b>	09 Wimbledon	N9.1 Wimbledon		MM108 MM109	We support the proposed confirmation that improvements to public transport should be secured and the addition of a new part that reads 'Creating a more pleasant environment for shopping and leisure activities 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.' This could be improved further by adding reference to the use of cargo bikes in the last sentence	No change proposed. "Last mile delivery solutions" can include cargo bikes.
430	101		<b>TfL Spatial Planning</b>	11 Housing	H11.5 Student Housing, other housing with shared facilities such as HMOs and bedsits	Below 11.5.6	MM180	We support the inclusion of transport and access criteria when considering the most appropriate sites for student accommodation proposals.	Support welcomed
431	101		<b>TfL Spatial Planning</b>	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	New para below 12.3.6	MM222	We welcome clarification that 'TfL's London Cycle Design Standards provides guidance for the design of dedicated cycle infrastructure.	Support welcomed.
432	101		<b>TfL Spatial Planning</b>	15 Green and Blue Infrastructure	P15.10 air quality, pollution and land stability	New paragraph below 15.10.1	MM315	We support inclusion of the new paragraph to address Merton's air quality by encouraging sustainable travel and working with partners including TfL.	Support welcomed
433	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.1 Sustainable travel	Part e	MM323	We note the proposed changes and welcome the added reference to reducing traffic dominance.	Support welcomed
434	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.2 Prioritising active travel choices	Part D	MM325	We note the proposed changes so that it now reads 'Provide secure, covered cycle parking facilities that meet London Plan minimum standards (higher level requirements) and are designed to a high standard, having regard to the London Cycle Design Standards. Facilities should include provision for charging of electric cycles and a minimum of 5% of cycle spaces should accommodate users of non-standard cycles.'	Support welcomed
435	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.2 Prioritising active travel choices	17.2.3	MM327	We support addition of the statement that 'TfL research indicates that a significant number of existing short car journeys in Merton could potentially be made by walking or cycling.'	Support welcomed
436	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.2 Prioritising active travel choices	17.2.4	MM328	We support the additions to this paragraph so that it now reads 'It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads. We will work with Transport for London, developers and other partners to make further improvements over the plan period with the aim of providing comprehensive cycling and walking networks that enable active travel choices to be made. In order to contribute to the aim set out in the Government's decarbonising transport strategy, to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies in 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period.' However the date for production of the cycling and walking strategies will need to be updated.	Support welcomed
437	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.2 Prioritising active travel choices	17.2.5	MM329	We support the substantial additions to this paragraph so that it now reads 'Development proposals must demonstrate through their Transport Assessment or Statement that sites are accessible by walking and cycling in accordance with TfL's Healthy Streets Approach. An Active Travel Zone (ATZ) assessment should be conducted in accordance with TfL guidance which assesses and identifies opportunities to integrate with and improve cycling and walking networks. ATZ assessments should particularly consider opportunities to improve cycle routes identified on the indicative cycle network map which shows cycling desire lines and potential routes that could form part of a future comprehensive cycle network to be delivered by the end of the plan period. Some sections of the network already have existing high quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However some routes will require significant intervention or further improvement to achieve the standard required. Developers should refer to Merton's and TfL's latest cycle route network maps and transport/ cycling strategies for further information on existing and planned routes and seek to consult at an early stage to discuss any requirements in relation to the cycle or pedestrian networks.'	Support welcomed
438	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.2 Prioritising active travel choices	17.2.6	MM330	We support the substantial additions to this paragraph so that it now reads 'Developments may be required to make financial contributions to cycling or walking schemes and/ or provide new routes across development sites. Any existing cycle or walking routes on or adjacent to development sites should be fully protected, including during construction phase, and opportunities should be sought to improve and upgrade routes as part of the development proposals. Development layouts must be designed to give priority to pedestrian and cycle movements, facilitate access to public transport networks and be designed in accordance with the Healthy Streets approach. New development should, where appropriate, seek to restrict traffic dominance by adopting the principles of low traffic neighbourhoods and filtered permeability into the site layouts and should integrate with and contribute towards any new or existing low traffic schemes on the surrounding street network. Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will not be permitted. New and improved street layouts including pedestrian and cycle infrastructure must be provided to a high standard with regard to the latest best practice design guidance and requirements including DfT Cycle infrastructure design LTN 1/20, Manual for Streets and TfL Streets Toolkit, Streetscape Guidance, London Cycling Design Standards, TfL Healthy Streets Approach and Healthy streets check for designers.'	Support welcomed
439	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.3 Managing the transport impacts of development	Part B	MM331	We note the proposed changes to part b so that it now reads 'Demonstrate that any detrimental impact on road safety can be mitigated to an acceptable degree with regard to The Mayor's Vision Zero target for road safety.'	Support welcomed
440	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.3 Managing the transport impacts of development	Part C	MM332	We support the addition of the first sentence 'Demonstrate how trips generated by the development will be managed to maximise sustainable travel patterns and reduce reliance on vehicle trips.'	Support welcomed
441	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.3 Managing the transport impacts of development	Part E	MM333	We note clarification that 'Developments that will have an impact on the transport network during construction will be required to develop a Construction Logistics Plan, informed by TfL's latest Construction Logistics Planning guidance'	Support welcomed
442	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.3 Managing the transport impacts of development	Part G	MM335	We note clarification that 'where a significant number of delivery trips are expected to be generated, develop a Delivery and Servicing Plan with regard to TfL's latest guidance.'	Support welcomed
443	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.3 Managing the transport impact of development	16.3.5	MM336	We support the additional statement that 'Developers should seek to engage with the Council and TfL at an early stage of the planning process to discuss the specific requirements for a travel plan which will be dependent on the type, scale, location and transport accessibility of the development.'	Support welcomed
444	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.3 Managing the transport impact of development	16.3.6	MM337	We support the additional statement that '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.'	Support welcomed
445	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.4 Parking and low emission vehicles	Part B	MM338	We welcome clarification that PTAL 5-6 should be explicitly referenced so that it reads 'Development in areas with good public transport accessibility, including town centres and all locations with a PTAL rating of 5 to 6, will be expected to be car free.'	Support welcomed
446	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.4 Parking and low emission vehicles	Part B	MM339	We welcome clarification that future occupants of developments in controlled parking zones will be ineligible for on-street parking permits.	Support welcomed
447	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.4 Parking and low emission vehicles	Part F	MM342	We welcome clarification that car club spaces should be provided with electric vehicle charging infrastructure and should be included within the London Plan maximum parking standards.	Support welcomed
448	101		<b>TfL Spatial Planning</b>	16 Sustainable Travel	T16.4 Parking and low emission vehicles	Part G	M343	We welcome clarification regarding the requirement for Parking Design and Management Plans.	Support welcomed

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449	101		TfL Spatial Planning	16 Sustainable Travel	T16.4 Parking and low emission vehicles	New paragraph below 16.4.15	M348	We welcome confirmation that 'Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it.'	Support welcomed
450	102		Thames Water	14 Infrastructure	F15.7 Flood risk management and sustainable drainage	Part e page 553	MM299	We support the changes as they are in accordance with the SoCG	Support welcomed.
451	102		Thames Water	14 Infrastructure	P15.10 air quality, pollution and land stability	Para 15.8.16	MM539	We support the changes as they are in accordance with the SoCG	Support welcomed.
452	102		Thames Water	15 Green and blue infrastructure	IN14.1 Infrastructure	Para 14.1.15-14.1.18	MM288	We support the changes as they are in accordance with the SoCG	Support welcomed
453	102		Thames Water	19 Policies Map	Appendices	MM-Green Corridor Map-07	MM-Green Corridor Map-07	We support the changes as they are in accordance with the SoCG.	Support welcomed.
454	102		Thames Water	Site allocations - multiple chapters	Site allocations - multiple chapters	Multiple	MM42;MM43; MM60;MM96; MM99;MM118	We support the changes where they relate to need to liaise with Thames Water in relation to water or wastewater/sewerage infrastructure	Support welcomed.
455	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			Merton Local Plan, Policy N8.1 Wimbledon Park Thank you for consulting The Gardens Trust on this new and specific policy for Wimbledon Park, a Grade II* Registered Historic Park and Garden of Special Historic Interest included on Historic England's Heritage at Risk register. The Gardens Trust does not usually comment on Local Plan policies. We are advising you on this occasion on account of our previous engagement with the planning application 21/P2900 for the expansion of the All England Lawn Tennis Club grounds onto Wimbledon Park Golf Course. Our advice was set out in two letters dated 13th May 2021 and 30th September 2021 (substantive advice to your Council). The Gardens Trust is broadly supportive of the proposed scheme, accepting it as a better way to secure the future of the registered landscape as a whole. However, we also expressed concerns such as the lack of a unified management vision across the site ownership, the lack of clarity about the provision of free and reasonable public access to the landscape in perpetuity and the scale of the new Parkland Stadium as proposed. Having considered the draft policy and its supporting text, we feel it will help deliver sustainable heritage benefit for Wimbledon Park, subject to the suggested amendments, and should help remove the site from Heritage at Risk. Our proposed amendments (in italics) to the policy text and to its supporting text, together with some suggested re-ordering and queries, are as follows:	Support welcomed.
456	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	WIMBLEDON PARK – POLICY N8.1 <del>To address the reasons why the Grade II* Wimbledon Park is on Historic England's Heritage at Risk Register and to recognise and support its sporting, recreation, ecological and amenity functions.</del> <i>To sustain and protect the heritage, ecological and amenity values of Grade II* Wimbledon Park Historic Park and Garden of Special Historic Interest by recognising and supporting its sporting and recreational function in such a way as to remove it from Historic England's Heritage at Risk Register.</i>	Amendment proposed to MM112 to state " <i>To sustain and protect the heritage, ecological and amenity values of Grade II* Wimbledon Park Historic Park and Garden of Special Historic Interest by recognising and supporting its sporting and recreational functions including in such a way as to remove it from Historic England's Heritage at Risk Register.</i> " The word "including" proposed to ensure that the policy's aim would still be delivered even in the event that the Park was removed from the HAR Register during the lifetime of the local plan
457	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	We will do this by supporting development proposals that: <i>a. Promote integrated and holistic solutions for any new development proposals, as far as is practicably possible, within the whole registered landscape.</i>	No change proposed. The policy can only apply to the part of the Registered Park and Garden that lies within the London Borough of Merton. Part of the registered landscape lies within the London Borough of Wandsworth.
458	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>b. Respond sympathetically to the historic design intention and scale of the registered landscape.</i>	No change proposed. The historic scale and design intention of Wimbledon Park was originally much larger than the current Wimbledon Park extent and it isn't clear how this policy would be practically implemented
459	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>c. Support the park's sport, recreation, play and amenity uses, and enhancing securing permanent and free access to them in perpetuity while taking into account any agreed and reasonable restrictions. This would ensure ensuring their successful integration with historic and biodiversity designations.</i>	No change proposed. This approach is already covered by Policy 14.3 "Sport and Recreation" which requires Community Use Agreements to be made for the development of new sporting facilities. Para 14.3.44 onwards states <i>Development proposals that include indoor and outdoor sport and recreation facilities will be expected to provide details showing how the facility will be made available to the wider community... This is to allow and promote access to affordable sports and recreation facilities for all members of the wider local community</i> ".
460	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>d. Prepare a landscape management plan, in collaboration with all landowners, to coordinate the long-term management and maintenance of Wimbledon Park.</i> <i>e. Secure investment in the former golf course to conserve and enhance conserve and restore the historic landscape, thereby securing biodiversity, sport and recreation functions and secure public access.</i>	No change proposed. Please see Historic England's Hearing Statement June 2022 Matter 14 <a href="https://www.merton.gov.uk/system/files/Matter14_19_HistoricEngland.pdf">https://www.merton.gov.uk/system/files/Matter14_19_HistoricEngland.pdf</a> and Document 0D13k Statement of Common Ground between Historic England and Merton Council dated 10th June 2022 which states that the phrase "conserve and enhance" should be used as this is the language of the NPPF and is necessary for soundness.
461	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>f. Address the lake's poor physical condition and, through doing so, seek restoration of its historic shape and form</i>	No change proposed. The policy states at (E) <i>Address the lake's poor condition and seek restoration of its historic shape and form</i> It is considered that both of these matters should be carried out. It is also considered that the policy as worded would support scenarios where a development could address the lake's poor condition but would not restore the lake's historic shape and form (e.g. by improving drainage outside the park that drains into the lake)
462	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>g. Improve public access around the whole lake while securing its function alongside protecting the lake's s-functions in relation to biodiversity, sport, public safety and flood risk, while and ensuring compliance for reservoir safety with the Reservoirs Act 1975.</i>	No change proposed. It is considered that the proposed policy wording has the same meaning as the representation intended and the change is not necessary for the soundness of the plan
463	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>h. Identify and protecting protect historic trees and other trees of significant amenity value and considering instigate a long-term programme for their renewal.</i>	Amendment proposed to MM112 in line with the representation for clarity to state <i>f. Identify and protect historic trees and other trees of significant amenity value and secure a programme for their renewal.</i>
464	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>i. Consider Prioritise the removal of insensitive tree and other non-native planting, particularly on the former golf course and around the athletics track.</i>	No change proposed. The policy is considered sound as written and based on the recommendations of the 2006 Wimbledon North (Wimbledon Park) Conservation Area Character Appraisal. It isn't clear from the representation what this matter should be prioritised against.
465	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>j. Protect and enhancing enhance biodiversity, thereby increasing the ecological interest of the park and its waterbodies.</i>	Amendment proposed to MM112 for clarity
466	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<i>k. Respect the site's historic setting, enhancing enhance historic and new views to and across the lake, and to St Mary's Church, and supporting support greater public access to these views.</i>	Amendment proposed to MM112 for clarity

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467	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	I. Improve and maintain ancillary facilities in Wimbledon Park, such as paths, bridges, fencing, drainage and public toilets, to facilitate and improve access for all sections of the community as part of a holistic approach to enhance historic landscape character and amenity	Amendment proposed to MM112 in line with the representation for clarity and in line with Historic England's Matter 14 hearing statement (June 2022) which promotes a unified response to landscape management and OD13k Statement of Common Ground between Historic England and Merton Council dated 10th June 2022 which sought a commonly agreed landscape management and maintenance plan for the whole historic park and garden to comply with NPPF (2021) para 190 and to address specific reasons behind the site's HAR status
468	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			SUPPORTING TEXT 8.1.1. Wimbledon Park is a Grade II* Historic Park and Garden, of more than special interest, lying to the north of the borough and crossing the borough boundary between Merton and Wandsworth. The majority (c48ha) of the park lies within the London Borough of Merton; a smaller proportion (c12ha) lies within the London Borough of Wandsworth. <i>In 2016 the Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register due to the following issues:</i> • Uncertainty around the future [of the entire historic landscape]. • The impacts of divided ownership on landscape management. • Obscured views. • The deterioration of the Lake.	No change proposed. This paragraph is already included in para 8.1.12
469	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			8.1.2. Wimbledon Park is the remnants of a larger Lancelot "Capability" Brown landscape, designed in the late 1700s originally for a nearby Manor House (since demolished). The Wimbledon Park Conservation Area Character Appraisal for Wimbledon Park contains details of the successive Manor Houses and the evolution of Wimbledon Park to what it is today. 8.1.3. Wimbledon Park is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of Wimbledon Park, owned by Merton Council is currently publicly accessible. The All England Lawn Tennis Club's main grounds lies to the west of Wimbledon Park across Church Road and the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park to be partially developed with additional tennis facilities.	Amendment proposed to para 8.1.3 to provide a factual update " <a href="#">Planning application 21/P2900 relating to the former golf course within Wimbledon Park has been considered by the London Boroughs of Merton and Wandsworth and is now with the Mayor of London for determination</a> ". The representation to add "to be partially developed with additional tennis facilities" is not proposed to be incorporated as it does not accurately reflect the extent of the planning application 21/P2900
470	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			8.1.4. The whole of Wimbledon Park is designated as Metropolitan Open Land, designated Open Space and Green Corridor. Wimbledon Park lies within Wimbledon North Conservation Area and a Tier 2 Archaeological Priority Area. Except for the public park, the site lies within a Site of Importance for Nature Conservation (SINC) Borough Grade 1. These designations are addressed by other policies in the Development Plan. 8.1.5. Wimbledon Park lake is the clearest-largest surviving feature of Capability Brown's original design. Other surviving landscape features over 200 years old include veteran trees and the presence of woodland at Horse Close and Ashen Grove. The lake is also a registered 'large raised' Reservoir under the Reservoir Act 1975, an active watersports destination and a Site of Importance for Nature Conservation SINC, containing protected species and their habitats. The Lake connects via the Wimbledon Park Brook and surface water sewer network into the River Wandle downstream in Earlsfield.	No change proposed, amendments not necessary for the Plan's soundness.
471	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			8.1.6. In addition to the historic and natural environment designations, Wimbledon Park is an intensively used sporting venue across all three land ownerships, hosting watersports, tennis, beach volleyball, cricket, hockey and golf until 2023. The public part of the park is also important for recreation, play and amenity as valuable urban greenspace. Wimbledon Park meets multiple priorities for green and blue infrastructure and associated amenity, education, health and wellbeing benefits as set out in Merton's Green Infrastructure Study 2020.	No change proposed, amendments not necessary for the Plan's soundness.
472	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			Sports, recreation and play 8.1.7. NPPF 2023 paragraph 98 states "Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change." The London Plan supports retaining and enhancing formal and informal sporting and recreational facilities to encourage physical activity and deliver a range of social, health and wellbeing benefits. The London Plan also recognises that the co-location of sporting facilities can increase participation. 8.1.8. Wimbledon Park supports a wide range of sports and recreational uses including angling, watersports, athletics, bowls, hockey, cricket, mini-golf, tennis and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play. In line with policy IN14.3 we will safeguard existing sport and recreation facilities, encourage further opportunities for sport, recreation and play, encourage co-location of services and improve community access where they do not unacceptably harm the wider heritage and ecological interests of the registered landscape. 8.1.9. The public park is intensively used and this policy seeks to maintain this and improve public access to private land ownership where possible. This policy supports the provision of well-maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support access to and enjoyment of more of the park for people of all ages and abilities.	No change proposed as the representation's proposed terms are not in line with national policy. NPPF paragraphs 205-214 set out the national policy tests for conserving designated heritage assets and uses terms like "substantial harm", "less than substantial harm" etc.
473	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			Enhancing biodiversity and access to nature 8.1.10. Wimbledon Park, including the lake, has multiple land use designations to support biodiversity and nature conservation. Protected species including different species of bat and birds, stag beetle, common frog and toad, European eel, veteran trees and other flora. There is also potential to improve biodiversity resilience by better habitat management, for example addressing the poor condition of the lake, removing recent planting located too close to veteran trees, replacing non-native with native species, and reducing pollutants in grassland management. In line with policy O15.3 biodiversity and access to nature we will protect and enhance biodiversity and improve accessibility to nature; these matters will be included in the landscape management plan. The historic environment 8.1.11. Paragraph 190 of the NPPF 2023 state "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. This strategy should take into account: a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) The desirability of new development making a positive contribution to local character and distinctiveness; and d) Opportunities to draw on the contribution made by the historic environment to the character of a place.	Support welcomed
474	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			8.1.12. moved to 8.1.1	No change proposed. This paragraph is already included in para 8.1.12
475	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			Addressing the future of the historic landscape and landscape management 8.1.13. Wimbledon Park is currently owned by three freeholders. The 9 hectare lake and c18 hectares of Wimbledon Park is owned by Merton Council and used as a public park, including part that lies within the London Borough of Wandsworth. 8.1.14. The remainder is privately owned and is not freely publicly accessible. 29 hectares is the freehold of the All England Lawn Tennis Club. In 2016 when Wimbledon Park was added to Historic England's "Heritage at Risk" register, Wimbledon Park Golf Club was the leaseholder of this land which was used as a golf course for many decades until January 2023. The remaining c4 hectares is owned by the Wimbledon Club. 8.1.15. Wimbledon North Conservation Area Character Appraisal 2006 (sub-area 2) describes the remnants of the Capability Brown landscape at Wimbledon Park (the registered landscape) and positive and detrimental features. For many decades landscape management has been divided across four organisations (the council, the Wimbledon Club, AELTC and their leaseholder, the Wimbledon Park Golf Club). The sites were being managed intensively and largely independently in accordance with their main purpose either as a public park including sporting and recreational uses, a private sporting venue or a golf course.	No change proposed. Not necessary for the soundness of the plan
476	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			8.1.16. Wimbledon north conservation area character appraisal 2006 identifies positive and negative landscape features within and just beyond Wimbledon Park. Addressing the negative features in Wimbledon Park's landscape, enhancing the positive features and, where possible, actively supporting better co-ordinating co-ordination of landscape management across the whole site will help to address the reasons that Wimbledon Park is on the Heritage at Risk Register. 8.1.17. To this end we will secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward (Tara, do you need a mechanism to achieve this without it being reliant on a development proposal? The individual landowners could each contribute to a stand-alone plan independent of a proposal). This will provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.	Amendment proposed to the first sentence of 8.1.17 of MM112 8.1.17. To this end we will secure the production of a landscape management and maintenance plan, including as part of development proposals that may come forward. A landscap management and maintenance plan could be secured either by agreement (if no relevant development proposals came forward) or in a relevant legal Section 106 agreement for a development proposal. There are three separate landowner and all landowners will need to agree to the landscape management and maintenance plan.

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477	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			Addressing obscured views 8.1.18. In the eighteenth century the original Capability Brown landscape was curated across a larger area in the "English Landscape" style, using the existing topography and man-made features including the creation of the lake with spurs to resemble river entrances, open parkland interspersed by carefully placed trees and woodland all giving rise to curated views, including of St Mary's Church spire. Veteran trees, particularly oak and some dating or pre-dating the 1800s, remain across the former golf course and within the council-owned public park. The woodland belts at Horse Close Wood and Asher Grove were also part of the Brownian layout. 8.1.19. Younger, faster growing trees have been planted to create fairways as part of the former golf course operations; sometimes obscuring the views and parkland setting and sometimes in too close proximity to veteran trees. Faster growing conifers and polars planted to screen the athletics track also dominate the landscape negatively. 8.1.20. Due in part to the reservoir dam face, trees, and C20th buildings and structures built within the park, the parkland and lake are difficult to see from key publicly accessible points, including Home Park Road, the closest entrance to Wimbledon Park Station. The topography (rising at either end and including the lake's dam face) both helps and hinders views across the area. Buildings on or adjacent the lakeshore in the public park and the Wimbledon Club site obscure views across the lake. 8.1.21. The following measures should be considered for addressing obscured views, including those derived from Wimbledon North Conservation Area Character Appraisal 2006: 8.1.22. To improve the historic view lines across the lake: a) Removing insensitive tree planting, particularly around the athletics track and on the former golf course. b) Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people. c) <i>Siting and scaling new development in response to the historic landscape design and its intended views.</i> 8.1.23. To improve views across the whole park and lake, improving historic views and creating new views: a) Removing insensitive fairway tree and other planting on the former golf course and anywhere else it is found, b) Improving public access to currently private land and particularly around the whole lake. c) Ensuring that viewing points are accessible to people of all abilities by creating or maintaining paths, fences and planting so as not to create a barrier to access or views. d) Ensuring that buildings or development are co-located wherever possible and designed to minimise their impact on the landscape.	No change proposed. Not necessary for the soundness of the plan
478	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			Addressing the deterioration of the lake 8.1.24. Wimbledon Park lake is the largest and most visible remaining feature of Capability Brown's man-made landscape. The spurs that feed into the lake have been partially filled in, reducing the lake's size, form and shape. The Lake is fed by overland flow paths and the surface water sewer network, principally by two large surface water sewers and outfalls both of which are currently adopted by Thames Water. The total catchment area which feeds the lake is approximately 230ha of which 40ha is direct catchment and 190ha is indirect catchment from urbanised areas, including highway runoff. 8.1.25. It is a registered as a Grade A large, raised reservoir, regulated under the Reservoir Act 1975. The reservoir is retained by an earthen embankment some 320m long. The height of the embankment varies from approximately 1m to a maximum of about 4m. The Lake flows into the River Wandle downstream in <i>Earlsfield</i> via the Wimbledon Park Brook and the surface water sewer network. 8.1.26. The Lake is not used for drinking water supply purposes. <i>Insert new item: The current poor quality of the Lake and its setting is one of the reasons that Wimbledon Park is on the "heritage at risk" register</i> 8.1.27. <del>As well as being a large, raised reservoir, the</del> The lake is intensively used for a variety of activities including angling, watersports and by wildfowl (including visitors feeding the birds) and has high localised amenity value. Over the years, the lake has suffered from pollution incidents, as a result of flytipping waste into drains or via drainage misconnections from private properties which inadvertently connects household foul drains to the surface water sewer network which ultimately feeds into the lake. Several of these pollution incidents have resulted in fish kills, particularly in summer when oxygen levels in the lake are low and water depths are shallow.	No change proposed as the representation's proposed new wording <i>The current poor quality of the Lake and its setting is one of the reasons that Wimbledon Park is on the "heritage at risk" register</i> is already in Merton's Local Plan post hearings consultation at para 8.1.26 <a href="https://www.merton.gov.uk/system/files/lbm31_accessible_mertons_local_plan_incorporating_proposed_modifications_accessible_feb24_0.pdf">https://www.merton.gov.uk/system/files/lbm31_accessible_mertons_local_plan_incorporating_proposed_modifications_accessible_feb24_0.pdf</a>
479	103		The Gardens Trust	08 Wimbledon Park	N8.1 Wimbledon Park			8.1.28. The lake is generally shallow in depth, sited in an urban area and in terms of water quality it is nutrient rich. During summer, when the water heats up and oxygen levels are low and nutrient levels are high, it suffers from algal blooms, some of which can be hazardous to wildlife, pets and the public and likely contribute to fish kills. Since its formation, the Lake has over time silted up quite considerably. This siltation is in part due to detritus ingress through the outfalls into the Lake, vegetation (leaf fall) and wildfowl habitat, combined with a relatively stagnant water passage through the lake being artificially dammed over hundreds of years. 8.1.29. A Section 10 Reservoir Act inspection report was carried out in 2014 which included statutory requirements that needed to be actioned to ensure compliance with the Act for Reservoir Safety. The council carried out a bathymetric survey of the silt levels in 2015. The council completed the Wimbledon Park Lake Reservoir Safety scheme in 2022, which has addressed reservoir safety requirements and made some improvements to the landscape and lake edge. As part of the wider opportunities of this project, the Council were able to deculvert an open section of the Wimbledon Park Brook in the public park to help create additional flood storage and improve the landscape and biodiversity. However the lake needs de-silting to ensure its amenity and historic value, to ensure water quality is not compromised, as the climate changes and hotter summers become more frequent. De-silting will be likely to help to reduce the number and length of algal blooms, improve its ecological capacity, increase oxygenation and continue to use the Lake it safely and fully for watersports, angling, heritage, biodiversity and amenity. 8.1.30. Given the size of this historic asset and its London location, the lake shoreline currently has very limited public access. We will work with all landowners to <del>improve</del> <i>secure greater public access in perpetuity</i> around the whole lake, taking into account biodiversity habitats, sporting, safety and reservoir management considerations	No change proposed. The supporting text currently aligns with part (g) of the policy to " <i>Improve public access around the whole lake, alongside protecting the lake's functions in relation to biodiversity, sport, public safety and flood risk, while ensuring compliance for reservoir safety.</i> "
480	104		Tiu. L	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 MM44	Here is why I strongly object to building a new set of Skyscrapers in Colliers Wood:  Skyscrapers tend to occupy significant amounts of land, leaving little to no space for parks and green areas. This can lead to a lack of access to nature, which has been proven to have numerous physical and mental health benefits. Lack of green spaces can also contribute to heat island effects, where urban areas become significantly hotter than their surrounding rural areas. Reduced sunlight and daylight: Large and densely packed skyscrapers can block sunlight and daylight from reaching the streets and lower buildings. This can result in a gloomy and shadowy environment, affecting people's mood and potentially leading to Vitamin D deficiencies. Natural light is crucial for maintaining a healthy circadian rhythm and overall well-being. Loss of historic and cultural identity: Skyscrapers can overshadow or completely replace historic and culturally significant buildings, eroding the distinctive character of the city. London is known for its rich history and diverse architectural styles, and an excessive focus on skyscrapers may threaten its unique identity. 4. Social segregation: Skyscrapers often cater to high-income individuals, leading to socio-economic segregation. Luxury apartments and penthouses in skyscrapers are usually inaccessible to middle and lower-income families, exacerbating existing social inequalities. This separation can create a sense of exclusion and contribute to social fragmentation. 5. Strain on infrastructure: Skyscrapers bring an influx of residents and workers to an already densely populated urban area, placing additional strain on existing infrastructure such as transportation, healthcare, and utilities. This strain can lead to increased congestion, longer commutes, and overburdened public services, negatively impacting the quality of life for residents. 6. Negative impact on the skyline and aesthetics: London's skyline is iconic and admired worldwide.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
481	105		Tooting and Mitcham Sport and Leisure Ltd	05 Morden	Mo3 Imperial Sports Ground Tooting and Mitcham Hub			We would however wish to record our disappointment that the opportunity for a wider release, to include the area for the future south stand development, has not been taken up at this particular time. Its continued designation as MOL provides an onerous planning policy context for delivering the remaining elements of the masterplan and by limiting the release solely to the MO3 site, it creates an irregular resultant MOL boundary line. 2.3 In our view, as advocated and evidenced at the relevant Local Plan hearing session, a far more logical and robust boundary would have been formed by combining the Mo3 release with the adjoining south-stand area, together with the other areas that were proposed for release (ie. at the approved front sports hall and rear changing room block areas), thereby reflecting those areas with extant planning permission and sited on previously developed land. 2.4 Notwithstanding, we will be continuing to promote this part of the wider site for a mixed-use development allocation to help complete the final stages of the hub project, as a logical and synergic parcel for development, immediately adjoining the Mo3 housing allocation and urban area generally. We therefore intend to pick up discussions with your Development Management Officers in due course.	No change proposed. This issue was discussed at the Hearings. Further release of MOL in this location is not supported by evidence.
482	105		Tooting and Mitcham Sport and Leisure Ltd	05 Morden	Mo3 Imperial Sports Ground Tooting and Mitcham Hub			We note that the PTAL for Mo3 has been changed from PTAL 1 'very poor' to PTAL 2 'poor' access to public transport. The change, whilst being a step in the right direction, does still not factually represent the true value of the site's access to A217 Bishopsford Road and is incorrect. SRL have been commissioned to review this technical matter and their report is attached. 3.2 The report concludes (at paragraphs 4.5 & 4.6) that- 'The base rear scenario is now outdated, although the future year scenarios better reflect the current PTAL, the manual calculation provides a more accurate PTAL using the most recent information supplied by the TfL timetables. It is therefore shown that the Site access demonstrates a PTAL of 3' (Our emphasis in bold). This is illustrated at Figure E on page 8, which shows the resulting PTAL band for the correct Index score of 11.031, providing a PTAL rating of 3. 3.3 The report also points out that the PTAL guidance no longer ascribes descriptions to the PTAL rangesso the 'Mo3'summary should not refer to 'poor' accessibility to public transport.	No change proposed. Please contact Transport for London for representations concerning changes to Public Transport Accessibility. As at April 2024 Transport for London's web-based PTAL tool shows that site M03 has a PTAL ranging from 01a, 01b and 02. Phrases such as poor or good public transport access are used within the local plan to help general understanding of the Local Plan beyond those involved in the property professions.



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483	105		<b>Tooting and Mitcham Sport and Leisure Ltd</b>	05 Morden	Mo3 Imperial Sports Ground Tooting and Mitcham Hub			[officer note: see original representation report of PTAL review by SLR Consulting Ltd]	No change proposed. Please contact Transport for London for representations concerning changes to Public Transport Accessibility. As at April 2024 Transport for London's web-based PTAL tool shows that site M03 has a PTAL ranging from 01a, 01b and 02. Phrases such as poor or good public transport access are used within the local plan to help general understanding of the Local Plan beyond those involved in the property professions.
484	105		<b>Tooting and Mitcham Sport and Leisure Ltd</b>	19 Policies Map	MM - open space map - 03			We fully support the change to remove the site from Metropolitan Open Land (MOL) for reasons of consistency with our clients' extant planning permission (Ref:- 19/P4094) for residential development, as shown at MM -Open Space Map -03 of the Schedule of Modifications to the Policies Map (LBM36).	Support welcomed.
485	106		<b>Turner, S</b>	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	I understand that the Planning Inspectorate has proposed removing the clause which states that no building taller than 19 storeys shall be built in Colliers Wood. In this email I wish to make clear my objection to this removal. There are several reasons for not constructing buildings higher than 19 stories, including the damage to the atmosphere in this predominantly low-rise environment of Colliers Wood. But the obvious reason is the demonstrable inability of the local authorities to manage these, and even lower-rise, buildings. I remind all readers of the potentially fatal failure of the structure of Britannia Point. Since this time the structure has been surrounded by the impractical, ugly structure that is needed to prevent Britannia Point causing injury or death by further structural failures. There is clearly an inability to ensure good practise and proper maintenance of this structure, so what ability would there be to manage additional buildings? But in addition, Colliers Wood is not a high-rise district. Britannia Point is not just a testament to the inability to manage such construction, but in itself is a monument to misplaced and inappropriate architecture. The entire local skyline that includes this aberration is ruined by the intrusion of this building. Further examples of this misguided and outdated approach to modern construction would be out-dated, ill-informed and short-sighted. Is the Planning Inspectorate really considering a reversion to 1960's approach? We are mor than 60 years ahead of this mis-guided policy, with mistakes and failures obvious from this era. It is for the benefit and protection of the community - not property speculators - that the Planning Inspectorate should act. Any new high rise buildings would be contrary to the community's best interest. I trust you will make the correct decision.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.
486	107		<b>Vece, B</b>	04 Mitcham	Mi16 Mitcham Gasworks		MM62	I am aware of the new plan to build a very high number of flats called MM62.  I want to express my objection to the whole plan in particular to the last decision to increase the number of flats.  The area is already overcrowded the way it is. The doctor's surgeries are having a hard time and this reflects on people wellbeing. Not to mention the traffic on that road and the bus service which is only one the 152.  If you have money to build something invest in other activities and entertainment or shops different from the many same kind we have in Mitcham centre.  We are really hoping Mitcham will become as at the moment is dangerous and there is nothing.  I would be grateful if you consider this and the many other objections the community is raising against the MM62 plan.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
487	108		<b>Waterfield, G</b>	04 Mitcham	Mi16 Mitcham Gasworks		MM62	We strongly oppose the recently proposed modification to the plans for development MM62. The existing plan allows for between 200 and 400 homes. The updated proposal of 500 to 650 homes adds an extra 300 to 450 homes to the existing, an increase of upto 325% from the original proposal. Not only will it change, beyond recognition, the character of the locale but will have a high impact on already stretched local facilities including schools, healthcare, roads and pavements, which are unlikely to be able to accommodate such an influx without major upgrading. The local roads, in particular Western Road are already often carrying heavy traffic including hgv's, buses etc., at a greater rate than can safely be accommodated. Pavements at points are far too narrow for the number of pedestrians at busy times.  My daughter attends Reception class at Liberty Primary School and the pavement outside the school is very narrow. This means, when arriving/leaving school, children and parents alike are having to walk on the very edge of the pavement when passing each other. This places them very close, often less than one meter, to passing traffic and I fear an accident is only a matter of time. Such a large influx of people in to the immediate area would only increase the risk.  The additional traffic would also be highly detrimental, leading to traffic quagmire, severely affecting local air quality.  As residents of Sadler's Close we live in the immediate area, use the local facilities and would directly feel the impact of all the above. In addition to this, should the 10 story development proposed be approved, we would likely lose much of the afternoon sunshine we are for fortunate enough to enjoy on our patio - our only outside space. And this is the case for many families living in Sadler's Close.  I think flooding the area with so many 'out of character' ten story buildings along with the huge number of additional people and cars it will bring will be severely impact the lives of those already living on the area.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
488	109		<b>White.D</b>	03 Colliers Wood	CW2 Britannia Point land south of		MM33 MM39 ,MM44	Ref - Modifications recommended following the Examination in Public - The land next to Britannia Point Colliers Wood I'm not a planning expert but I've read the submission sent in by the Colliers Wood Residents Association regarding there not being any new towers taller than Britannia Point. I full support this detailed submission so please add my name to it.	Amendments proposes to MM33, 39, 44 that Britannia Point should remain the pinnacle building in the town centre in terms of height, unless an up-to-date local Design Guide or Design Code justifies an alternative. The Design Guide or Design Code should be based on effective community engagement, reflect local aspirations for the development of the area and should take into account national government guidance.

	A	B	C	D	E	F	G	H	I
489	110		Wicks, S	15 Green and Blue Infrastructure	Policies Map - open space			<p>I'm a resident of Cannon Hill ward, a nature enthusiast and a near daily user of Morden Park. I have the following comment relating to the park. In short, I think the local plan should extend the SINC designation to the WHOLE of the park and not merely part. There is a compelling argument to protect the increasing biodiversity of the part of the park that is not currently protected (ie, the remainder of the former playing fields in the north east of the park)</p> <p>The proposed local plan acknowledges that Morden Park is a Borough Grade 1 listed Site of Importance for Nature Conservation, a local nature reserve and falls within Metropolitan Open Land. It's also described as a green corridor. The plan proposes a slight boundary change to the MOL within Morden Park as a result of the demolition and rebuild of the leisure centre.</p> <p>It does not, however, respond to or acknowledge the recommendation of the Borough Council's 2020 Green and Blue Infrastructure, Biodiversity and Open Space Study that the Site of Importance for Nature Conservation that encompasses most of Morden Park be extended to include the eastern portion of the park, thus finally containing the whole of what was at one time used as playing fields.</p> <p>There are compelling arguments for extending the SINC thus, as the study itself acknowledges: the park plays a vitally important role in strengthening the biodiversity and ecological resilience of the borough. Despite this part of the park being frequently referred to as 'neutral grassland', it is in fact an extremely rich habitat that supports a range of species. The grasses in the former playing field are a particularly diverse mix and when allowed to grow long in summer provide good habitat for insects, particularly butterflies.</p> <p>For a start, around half of the UK's butterfly species have been recorded in Morden Park and a growing number breed and feed in this specific part of the park that is unprotected (eg, the Brown Argus, which is pretty unusual in this part of the world). The rough grassland provides a valuable hunting ground for the park's kestrels and their young, which they teach to hunt in the former playing field. At certain times of the year, kestrels are a frequent sight above this field and its adjoining treelines (they particularly like the treeline separating the former playing field from the field beside the A24 that is still used for sport)</p> <p>More recently, a pair of hobbies has taken to breeding and hunting in this general area of the park. It's likely that the proximity of the two fenced off ponds are the major draw (there seems to be a growing population of dragonflies/damselflies in the park) and it's possible that the new scrape alongside the new leisure centre may provide a breeding ground for the insects that hobbies enjoy.</p> <p>In the last year to 18 months, Morden Park's badger population has moved into wooded areas next to the former playing field and badger tracks can be clearly seen going through this part of the park, from the treeline at the Hillcross Avenue end to the scrape beside the leisure centre. There is plenty of evidence of the badgers foraging in the part of the field that is not protected by a SINC and in and around the scrape.</p>	No change proposed. The draft of the Policies Map submitted for examination in public in December 2021 (OD2 Merton's Local Plan Policies Map Stage 3 Reg 19 – July 2021), included the proposed expansion of the Morden Park SINC, to include the northwestern part of Morden Park, as recommended within the Merton Green Infrastructure Biodiversity and Open Space Study 2020 (15D1). The modifications to the Morden Park SINC boundary as described within the Schedule of Modifications to the Policies Map dated January 2024 (LBM36), are relatively minor changes to that proposed in OD2.
490	111		Wilson, J	11 Housing	H11.1 e. Aim for the strategic target of 50% of new homes built in Merton between 2021/22 -20367 /38 to be affordable. f. Expect the following level of affordable housing (gross) to be provided on individual sites as follows:	p363-364		<p>Implementing this Policy to provide affordable homes for 2-9 units will have the complete reverse effect to what the Council are trying to achieve, and this is currently being demonstrated in both Richmond and Southwark Councils who have implemented this policy in recent years and is the reason why the Planning Inspectorate forced Lambeth to drop the small site contribution to the Lambeth Local Plan (2021) as the Inspector concluded implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, the Inspector stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>As part of any objection, it is important Merton learn from the experience of their neighbours, particularly Southwark as this borough is demonstrating today that this policy won't work. At present in Southwark there are over 100 applications (2-9 units) sitting in limbo whilst the applicants and the Council debate contribution amounts and no applications are being approved and no small sites being developed. Merton is already experiencing delays with these minor applications (2-9 units), if this policy is implemented then it will only clog up the planning system in Merton further which is still yet to recover to the standard 8-week assessment period developers enjoyed pre-covid.</p> <p>In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64 of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement on the matter on 28th November 2014 and the Secretary of State's letter of 13th March 2020, and in particular Direction 3.</p> <p>As well as the delay the other main objection is the financial viability of implementing this policy. As the Planning Inspector stated in Lambeth with the average decision period taking 71 weeks and interest rates at a 15 year high it is simply unsustainable for small developers to hold sites for this amount of time with the current borrowing costs. Also, costs of achieving planning permission have risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures have pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>These increase in development costs come down to simple math, if developers stop building properties in Merton as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. Finally, if it becomes too expensive for developers to develop in Merton the small derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Merton will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p>	No change proposed. The response raises objections that relate to other aspects of the Plan and not the Main Modifications presented for consultation. The approach set out in the Plan to the provision of affordable housing (including seeking provision from small sites), and whether the approach would be effective, justified and in general conformity with the London Plan, and consistent with national policy, have been extensively examined and assessed through the Local Plan Examination including being discussed at the Inspector's Public Examination Hearing session held in June 2022 and also via published council examination documents and statements in response to the Inspectors Preliminary Matters, Inspectors' Matters Issues and Questions. Please refer to <b>INSP03a</b> Inspectors' Matters Issues and Questions (V2 April 2022) - Matter 4 and 8 ; <b>INSP08</b> Hearings Programme updated June 2022 - Matter 4 and 8; Council Stage 1 Hearing Statements (June2022) - Matter 4 and 8; <b>INSP22</b> Inspectors' Post Hearing letter (April 2023). All documents can be accessed on the councils website <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission</a> .
491	112		Wimbledon Society	01b Good Growth	STRATEGIC MAP	19		<p>The references are to the page numbers as set out in document LBM 31, and our responses are as follows. Page 19 Ideally, the small key BOROUGH MAP WOULD GAIN FROM UPDATING please, for clarity: eg : • Railways being shown as a solid line: • Adding in the lines of main roads outside the Borough boundary, to aid understanding: • Site allocations need to be shown as a symbol (eg star) so that the basic underlying land use allocation remains clear eg Wimbledon Park should be shown as MOL green, not as a yellow site: • Arrows should follow river flows.</p>	Amendment proposed to map formatting for clarity
492	112		Wimbledon Society	01c Urban Development vision and objectives		p35 1.2.50		<p>1.2.50 Note that references to Crossrail 2 have generally been removed, being presumed to come later, after the Plan period: although there are still references to it in the later text (eg 9.1.12: page 607).It is not clear whether the safeguarding of certain 'riparian' Crossrail sites is still in operation. Chapter 1C p35: ADD COMMA to aid clarity: "protected, (comma) and improved access to MOL....."Reason: to make clear that the protection of MOL open-ness is a clear major national and regional Policy</p>	No change proposed. Response relates to 2021 draft Local Plan which has since been amended through examination. Please see Document OD6 Schedule of Regulation 19 representations to Merton's Local Plan July-September 2021 for the council's response to this representation. <a href="https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf">https://www.merton.gov.uk/system/files/Schedule%20of%20Regulation%2019%20representations%20to%20Merton%27s%20Local%20Plan%20stage%203%20July%20-%20September%202021.pdf</a>
493	112		Wimbledon Society	02 Climate change	CC2.2 Minimising greenhouse gas emissions	p45		<p>Chapter 2 p45 on Climate Change: Amend: the table proposing a significant reduction in the minimum carbon reduction targets is not agreed: THE FIGURES SHOULD STAY AS IN THE ORIGINAL DRAFT: Reason: That the London Plan specifies these lower figures does not mean that the Local Plan has to slavishly follow. Achieving the higher (Borough) figures still ensures that the values set out in the London Plan will be met, by definition, and the higher local plan figures are therefore considered to be compliant/sound. The London Plan does not say that the Boroughs' Plans cannot set higher targets, only that they must (at least) achieve the levels set in the London Plan. That an individual Borough can aim to "beat" the "specified from above" target should be a given – see for example the admirable "Merton Rule" energy target adopted by the Borough some 20 years ago, which was adopted by many other authorities, and was a ground-breaker nationally at the time.</p>	No change proposed. Please see Document INSP22 paragraphs 40-47 of the Planning Inspectors' letter to the council (March 2023) <a href="https://www.merton.gov.uk/system/files/INSP22%20-%20Post%20Hearings%20Letter.pdf">https://www.merton.gov.uk/system/files/INSP22%20-%20Post%20Hearings%20Letter.pdf</a> and Document INSP29 Government Written Ministerial Statement on "planning - local energy efficiency standards (January 2024) <a href="https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hlws120">https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hlws120</a>
494	112		Wimbledon Society	02 Climate change	CC2.2 Minimising greenhouse gas emissions	Part eii page 45		<p>P45 CC2.2Eii: OFF-SITE ADDITIONALITY IS NOT AGREED: (where a project is not (supposedly) feasible if carbon offsets are not allowed): Omit: ITEM (ii) SHOULD THEREFORE BE REMOVED IN ITS ENTIRETY: Reason: Recent independent studies have shown that the off-site carbon offset system world-wide has seemingly very significant flaws, is inherently liable to be unsound, and lacks credibility.</p>	No change proposed. Carbon offsetting is established in the London Plan 2021 and policy CC2.2e facilitates this "Where it is clearly demonstrated that the net-zero carbon target cannot be fully achieved on site beyond the minimum requirements..."
495	112		Wimbledon Society	02 Climate change	CC2.4 Low carbon energy	2.4.14 page 63		<p>2.4.14 p63: Support the new paragraph on Heat Pumps.</p>	Support welcomed.

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496	112		Wimbledon Society	02 Climate change	CC2.5 Minimising waste and promoting a circular economy	part c page 66		CC2 5c p66: Add: "Reducing embodied carbon emissions by .....materials, RE-USING EXISTING BUILDINGS, and designing buildings shapes and forms": (Alternatively, this could be given its own paragraph eg 5cc). Reason: To follow the current approach advocated by the RTPI, the RIBA, and LETI amongst many others, in order to reduce carbon footprint, in accordance with national energy & sustainability policy.	No change proposed. This matter is already reflected in CC2.5a which states (incorporating proposed modifications " a. Where existing buildings are on site, to prioritise their reuse and retrofit wherever possible before considering the design of new buildings."
497	112		Wimbledon Society	03 Colliers Wood	N3.1 Colliers Wood	3.1.23 / p.87	AM166	<b>Support the OMISSION OF THE PHRASE</b> ..... "Site allocations are planning policies....". Reason: <i>Planning Policies cover &amp; are applied to the whole Borough, or one of the Town centres. Site allocations are just that – they relate only to the specific site, and are not, and cannot ever be, "Policies".</i> Additionally, to be consistent, this omission should also apply to its (in our view incorrect) use in: - Colliers Wood p82 N3.1.23 - Mitcham p116N4.1.17 - Morden p197 5.1.64 - Raynes Park p232 (6.1.16) p300  <b>Amend:</b> The proposed removal of the remainder of the two paragraphs <b>IS NOT ACCEPTED AND SHOULD BE REINSTATED</b> ; ie retain "Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site ..... the London Plan". <b>DELETE</b> the substituted wording inserted "Identifying sites for a specific land use.....contained in the development plan as site allocations". Reason: <i>No justification is offered for using different explanatory wording for all Site Allocations in Wimbledon, as compared with those in the other areas listed above.</i> There should be consistency. Also the new wording fails to mention that the Sites are "key potential development sites of strategic importance", and need to be "integrating well into (their) surroundings".	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
498	112		Wimbledon Society	04 Mitcham	N4.1 Mitcham	4.1.17 / p.116	AM166	<b>Support the OMISSION OF THE PHRASE</b> ..... "Site allocations are planning policies....". Reason: <i>Planning Policies cover &amp; are applied to the whole Borough, or one of the Town centres. Site allocations are just that – they relate only to the specific site, and are not, and cannot ever be, "Policies".</i> Additionally, to be consistent, this omission should also apply to its (in our view incorrect) use in: - Colliers Wood p82 N3.1.23 - Mitcham p116N4.1.17 - Morden p197 5.1.64 - Raynes Park p232 (6.1.16) p300  <b>Amend:</b> The proposed removal of the remainder of the two paragraphs <b>IS NOT ACCEPTED AND SHOULD BE REINSTATED</b> ; ie retain "Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site ..... the London Plan". <b>DELETE</b> the substituted wording inserted "Identifying sites for a specific land use.....contained in the development plan as site allocations". Reason: <i>No justification is offered for using different explanatory wording for all Site Allocations in Wimbledon, as compared with those in the other areas listed above.</i> There should be consistency. Also the new wording fails to mention that the Sites are "key potential development sites of strategic importance", and need to be "integrating well into (their) surroundings".	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
499	112		Wimbledon Society	05 Morden	N5.1 Morden	p.197	AM166	<b>Support the OMISSION OF THE PHRASE</b> ..... "Site allocations are planning policies....". Reason: <i>Planning Policies cover &amp; are applied to the whole Borough, or one of the Town centres. Site allocations are just that – they relate only to the specific site, and are not, and cannot ever be, "Policies".</i> Additionally, to be consistent, this omission should also apply to its (in our view incorrect) use in: - Colliers Wood p82 N3.1.23 - Mitcham p116N4.1.17 - Morden p197 5.1.64 - Raynes Park p232 (6.1.16) p300  <b>Amend:</b> The proposed removal of the remainder of the two paragraphs <b>IS NOT ACCEPTED AND SHOULD BE REINSTATED</b> ; ie retain "Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site ..... the London Plan". <b>DELETE</b> the substituted wording inserted "Identifying sites for a specific land use.....contained in the development plan as site allocations". Reason: <i>No justification is offered for using different explanatory wording for all Site Allocations in Wimbledon, as compared with those in the other areas listed above.</i> There should be consistency. Also the new wording fails to mention that the Sites are "key potential development sites of strategic importance", and need to be "integrating well into (their) surroundings".	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
500	112		Wimbledon Society	06 Raynes Park	N6.1 Raynes Park	p.232	AM166	<b>Support the OMISSION OF THE PHRASE</b> ..... "Site allocations are planning policies....". Reason: <i>Planning Policies cover &amp; are applied to the whole Borough, or one of the Town centres. Site allocations are just that – they relate only to the specific site, and are not, and cannot ever be, "Policies".</i> Additionally, to be consistent, this omission should also apply to its (in our view incorrect) use in: - Colliers Wood p82 N3.1.23 - Mitcham p116N4.1.17 - Morden p197 5.1.64 - Raynes Park p232 (6.1.16)  <b>Amend:</b> The proposed removal of the remainder of the two paragraphs <b>IS NOT ACCEPTED AND SHOULD BE REINSTATED</b> ; ie retain "Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site ..... the London Plan". <b>DELETE</b> the substituted wording inserted "Identifying sites for a specific land use.....contained in the development plan as site allocations". Reason: <i>No justification is offered for using different explanatory wording for all Site Allocations in Wimbledon, as compared with those in the other areas listed above.</i> There should be consistency. Also the new wording fails to mention that the Sites are "key potential development sites of strategic importance", and need to be "integrating well into (their) surroundings".	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
501	112		Wimbledon Society	06 Raynes Park	RP3 Burlington Road	240		Site RP3 Tesco: item 5 p240: Support "public access along the Pyl Brook for pedestrians and cycles": Site RP3 Tesco: infrastructure: Add "and ensure that infrastructure requirements INCLUDING RESOLVING THE LEVEL CROSSING OBSTRUCTIONS TO RAIL AND ROAD TRAFFIC have been addressed": Reason: Although Crossrail 2 is currently not likely to come about in the time frame of this Plan, this rail line is an important feeder route, and the Crossrail promoters were investigating how the road could be taken under the rail line. This would remove a significant time constraint. For this to work, their drawings showed that land within the Tesco site would be needed. So it would be prudent in planning terms to limit permanent development in that corner of the site. Support the restoration of the Pyl Brook Habitat	No change proposed. There is no evidence that Crossrail2 will be deliverable within the lifetime of this local plan.

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502	112		Wimbledon Society	06 Raynes Park	RP3 Burlington Road			Remove: The Reference to 52m high buildings is not accepted: Add: "THE SITE COULD INCLUDE TALLER BUILDINGS OF NO MORE THAN 6 STOREYS". Reason: Such a high structure would be wholly visually intrusive in what is a low storey height suburban area. It would also be contrary to the stated Objective (p223) of "respecting local character and amenity". Also be contrary to Policy N6.1M "resecting local character ... and amenity in surrounding residential neighbourhoods: Also Para 6.1.13.	No change proposed. Planning permission 19/P2387 was granted on appeal in June 2021 for a development from 6 to 15 storeys and the site is under construction. One of the council's stated reasons at appeal for not supporting the proposal was its effect on the character and appearance of the area.
503	112		Wimbledon Society	06 Raynes Park	RP4 80-86 Bushey Road			Site RP4 p243: site allocations: OMIT: the suggested short term use for commercial/retail/industry is not accepted, and SHOULD BE REMOVED. Instead the site should continue to be ALLOCATED TO RESIDENTIAL-LED MIXED USE, with the INCORPORATION OF A NEW PEDESTRIAN AND CYCLE PATH THROUGH THE SITE linking Bodnant Gardens to the SW site corner Reason: any proposals for short term use can then be considered in that context. The proposed public pathway through the site would provide a better and safer route, avoiding the severe gradients and traffic danger that now exist over the current bridge. It would also give better, safer, and more over-looking to the access routes to the Primary and Secondary schools nearby. Reason: any proposals for short term use can then be considered in that context. The proposed public pathway through the site would provide a better and safer route, avoiding the severe gradients and traffic danger that now exist over the current bridge. It would also give better, safer, and more over-looking to the access routes to the Primary and Secondary schools nearby. p244 Infrastructure should "INCLUDE A PUBLIC PEDESTRIAN & CYCLE ROUTE THROUGH THE SITE". Reason: as above.	Additional modification proposed to state that planning permission 22/P3021 was granted on 11th July 2023 for a development of workshops and storage on this site. No change proposed to add a pedestrian and cycle route as this is already covered under the site's "Design and Accessibility guidance" heading which states "Development proposal will need to improve walking and cycling and access to public transport between the site and Raynes Park Town Centre. Cycling and walking routes must be created through the site which would also provide direct access from Raynes Park High School and homes to the south of Bushey Road to shops and services in Raynes Park Town Centre via Bodnant Gardens. Contributions may be sought towards improvements on the cycle and pedestrian network that connects to the site."
504	112		Wimbledon Society	06 Raynes Park	P15.10 air quality, pollution and land stability	p300		SEE ABOVE COMMENT	No change proposed - matter addressed under above comment (see original comment online <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/post-hearings-consultation">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/post-hearings-consultation</a> )
505	112		Wimbledon Society	07 South Wimbledon	N7.1 South Wimbledon	Part C P270		Chapter 7 South Wimbledon: N7.1c Support the addition of "Respect Heritage Assets". Reason: This is an area that has links to Nelson, and to the early development of the Borough.	Support welcomed.
506	112		Wimbledon Society	07 South Wimbledon	Wi8 South Wimbledon Station	P270		p270 Site Wi8 South Wimbledon Station: Comment: As it is now proposed that South Wimbledon is to be set up independently of Wimbledon, with its own Chapter, should not the Site allocation identification be "SW1" rather than "Wi8"?	No change proposed - matter addressed under above comment (see original comment online <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/post-hearings-consultation">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/post-hearings-consultation</a> )
507	112		Wimbledon Society	08 Wimbledon Park	N8.1 Wimbledon Park	CHAPTER 8/P 274		Chapter 8 Wimbledon Park "Policy" N8.1 p274: See also the separate letter from the Wimbledon Park Residents' Association dated 15 March.	Response considered under representations from Wimbledon Park Residents Association
508	112		Wimbledon Society	08 Wimbledon Park	Wi3 All England Lawn Tennis Club Church Road			The AELTC section - please see also the separate letter from the Wimbledon Park Residents' Association dated 15 March.	Response considered under representations from Wimbledon Park Residents Association
509	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	P288/286		Chapter 9 Wimbledon P289 Omit: The proposed new reference to "supporting tall buildings within Wimbledon Town Centre" IS NOT ACCEPTED AND SHOULD BE REMOVED Reason: Local people have consistently said over many years that the limit should be around 6 storeys, which is sufficient to provide additional floorspace encourage controlled development, yet respect and reflect local character. Also, this is in direct contravention to the stated Objective (p286) to "maintain the unique character of the area, (and) supporting development .... that is commensurate with the scale". Also, authoritative studies by LETI and others are showing that higher buildings use more energy, and are sustainably less efficient. Croydonisation should not be a model.	No change proposed. Very detailed character analysis and community consultation has taken place for Wimbledon town centre and is published in the FutureWimbledon supplementary planning document. This considers the existing character plot by plot and the proposed building heights are in keeping with existing buildings in the area. The Local Plan's building heights for Wimbledon are based on this analysis. The Local Plan policy on Wimbledon also recognises that Wimbledon is tightly bound by attractive residential areas. Para 9.1.1 and 9.1.2 state Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150-year-old Wimbledon Tennis Championships. Wimbledon is also Merton's only Major Town Centre, and the heart of its successful economy. The area is served by tube, train, tram and bus, is surrounded by high quality homes set in attractive streets and well served by local infrastructure....Design quality underpins good growth. 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.
510	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	Part E		N9.1E Support the removal of Hartfield Road and Broadway East from the areas identified as suitable for tall buildings:N9.1E Omit reference to St George's Road: Reason: "away from the historic core and located around the station" is sufficient (see also 9.1.8).	Support welcomed.
511	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	Part J		N9.1J Add: The removal of the long-standing Plan Policy to "reduce severance with new bridges over the railway" IS NOT ACCEPTED, AND IT SHOULD BE RE-INSTATED. Reason: The single rail bridge makes the continued safe operation of the town centre highly vulnerable, and the safeguarding of an additional bridge route (at the northern end of the "Centre Court/Wimbledon Quarter" site) has been a long-standing and integral part of previous Borough Plans. Indeed the service vehicle ramp of the Centre Court project was specifically designed in the 1980's to lead to a future new bridge over the tracks, linking Queen's Road and Alexandra Road. The current traffic domination of the centre is unpleasant, adversely affects local character, and not in the best interests of the future town. An additional bridge could provide options for traffic, and also for improving the pedestrian environment. What can be lost by continuing this safeguarding? Safeguarding that route and bridge location should therefore still be included in the Local Plan. N9.1J Add: Whilst supporting the new Policy of reducing traffic dominance in the Town Centre, the wording should include a specific mention of pedestrianisation, eg "by reducing traffic dominance, ENCOURAGING PEDESTRIANISATION, and managing DELIVERY ....".Reason: as above.	No change proposed. There is no evidence of deliverable proposals for additional bridges within the lifetime of this local plan.
512	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	Part Q P291		N9.1q p291: Support the removal of the "either side of Church Road" AELTC reference: see also the separate letter from the Wimbledon Park Residents' Association dated 15 March.	Support welcomed.
513	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	9.1.33 P297		N9.1.33 p297 Support the environmental improvements for Wimbledon Chase: But the use of the word "lobby" is not considered suitable for a formal Borough Plan, and should instead be replaced by "press for" or "promote" or similar.	Support welcomed.
514	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	9.1.35 P298		N9.1.35 p298 Add: "..... international significance, SUBJECT TO THE POLICY ON MOL, to maintain...." Reason: Any upgrading of the AELTC facilities must be tempered by the primacy of, for example the maintenance of open-ness, & the continuing prevention of buildings on designated MOL, all in accord with NPPF & London Plan Policy. See also the separate letter from the WimbledonPark Residents' Association dated 15 March.	No change proposed. Not necessary for the soundness of the plan

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515	112		Wimbledon Society	09 Wimbledon	N9.1 Wimbledon	p.300	AM166	<p><b>Support the OMISSION OF THE PHRASE</b> ..... ".....Site allocations are planning policies.....".  Reason: <i>Planning Policies cover &amp; are applied to the whole Borough, or one of the Town centres. Site allocations are just that – they relate only to the specific site, and are not, and cannot ever be, "Policies".</i>  Additionally, to be consistent, this omission should also apply to its (in our view incorrect) use in:  - <i>Colliers Wood p82 N3.1.23</i>  - <i>Mitcham p116N4.1.17</i>  - <i>Morden p197 5.1.64</i>  - <i>Raynes Park p232 (6.1.16)</i></p> <p><b>Amend:</b> The proposed removal of the remainder of the two paragraphs <b>NOT ACCEPTED AND SHOULD BE REINSTATED</b>; ie retain "Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site ..... the London Plan".  <b>DELETE</b> the substituted wording inserted "Identifying sites for a specific land use.....contained in the development plan as site allocations".  Reason: <i>No justification is offered for using different explanatory wording for all Site Allocations in Wimbledon, as compared with those in the other areas listed above.</i>  <i>There should be consistency.</i>  Also the new wording fails to mention that the Sites are "key potential development sites of strategic importance", and need to be "integrating well into (their) surroundings".</p>	Amendment proposed to replicate AM166 in all chapters (previously only in Wimbledon chapter) to improve clarity. Integrating sites into their surroundings is a policy requirement for all sites in urban design policies in chapter 12 places and spaces"
516	112		Wimbledon Society	09 Wimbledon	Wi2 Broadway car park adjacent New Wimbledon Theatre	p.305	MM47	<p>Add: The <b>removal</b> of the proposed reference to <b>public open space being provided via public realm improvements</b> is not accepted and <b>SHOULD BE RETAINED</b>.  Reason: <i>as the Council document says, this is an area that is deficient in public access to open space. Given that the Theatre Car Park site is in Council ownership, and is currently unbuilt, any future development should be able to incorporate a modicum of public sitting/planting space.</i></p>	<p>No change proposed.  As set out in draft Local Plan Policies IN14.3(d) and O15.2(d) and London Plan Policies S4 and G4, the provision of play space and open space are only required from allocations where residential Major Development is proposed.  Site Wi2 is proposed to be allocated for: "a suitable mix of Town Centre Type Uses such as retail, café and restaurants, community, cultural, leisure and entertainment, offices and hotel."  This proposed modification stems from the council's reponse to Question 6, Matter 8 of the Stage 2 MIQs.</p>
517	112		Wimbledon Society	09 Wimbledon	Wi6 Highlands House			<p>Add: The removal of the proposed reference to public open space being provided via public realm improvements is not accepted and SHOULD BE RETAINED: Reason: <i>as the Council document says, this is an area that is deficient in public access to open space: any future development should be able to provide a modicum of sitting/planting space for the public, given that the present structure is well set back from the public highway.</i></p>	No change proposed.
518	112		Wimbledon Society	09 Wimbledon	Wi16 Centre Court Shopping Centre, The Broadway			<p>Item 1: Support the introduction of the word "repurposing".  Regret that the addition did not allow the removal of the somewhat bizarre description of the site as "brownfield".  Reason: <i>the renovation and re-purposing of the site is proceeding.</i></p>	Support welcomed.
519	112		Wimbledon Society	09 Wimbledon	Wi3 All England Lawn Tennis Club Church Road	p.300 (and p.307)	MM116	<p>Site Allocations diagram: <b>Support</b> that the Wimbledon Park land is now not included in the site allocation.  Reason: <i>The MOL and several other designations clearly set the Historic Parkland well apart from the existing commercial, and intensively developed, AELTC site.</i></p>	Support welcomed.
520	112		Wimbledon Society	10 Health and Wellbeing	P15.10 air quality, pollution and land stability		MM116	No comment.	Support welcomed.
521	112		Wimbledon Society	11 Housing	H11.1 Housing Choice	11.1.20, P370 PARA 11.1.18,	MM116	<p>General comment: there are a number of references to "we", as in eg 11.1.20 where the suggested text reads...."following the adoption of this Plan WE will publish guidance ....". It is suggested that instead, the Plan wording throughout should generally be impersonal: eg along the lines that .....following the adoption of the Plan, published guidance will ...." See for example the correction at para 14.1.15.  p370 11.1.18 Omit: The introduction of the phrase "other policy requirements may need to be reduced to compensate for these costs" into the Local Plan is <b>NOT ACCEPTED AND SHOULD BE REMOVED</b>. Reason: It would lead inevitably to developers attempting to justify daylight infringements to adjoining properties, loss of privacy ditto, higher and out-of-character buildings, loss of open land, and perhaps even building on protected open spaces (eg the Lessa sports ground off Grand Drive). Reliance on what is now commonly seen as the discredited system of so-called "viability statements" would lead to lower standards and poor planning decisions. Instead of using their energy to create good designs, the developer will instead be encouraged to "game the system", and see what lower standards they can get away with. If a scheme cannot meet the legitimate design and planning criteria in the Local Plan, then its promoters should go elsewhere. Perhaps returning later when market conditions have changed. The planning system must maintain credibility and respect, if it is to be supported by the public. There is no point in sanctioning poor quality development: we are already having to demolish schemes built inadequately just 40 years ago, hardly a sustainable approach.</p>	<p>No change proposed.  The Local Plan covers the London Borough of Merton as local planning authority and the term 'we' denotes Merton taking responsibility and ownership for what it does. It is considered the term 'we' also helps present a user friendly tone and pitch to the Local Plan.  The phrase "other policy requirements may need to be reduced to compensate for these costs" is an extract from Merton's Housing Viability Study 2020, which has been prepared in accordance with the requirements of the NPPF and NPPG. In particular paragraph 34 of the NPPF states that <i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</i></p>
522	112		Wimbledon Society	11 Housing	H11.2 Housing provision	11.2.4	MM116	<p>Omit: The suggestion that "green spaces" are a constraint on the supply of housing is not accepted, and should be removed, so as to read:  ".....CHARACTERISED BY A LARGE NUMBER OF SMALL SITES. THESE CHARACTERISTICS....."  Reason: Including such a reference in the Plan would be an encouragement to those who wish to build on such green spaces (eg the Lessa sports ground in Grand Drive).  Additionally, the Health and Wellbeing Chapter identifies Access to Open Space and Nature as a major issue (p349) as does the Strategic Policy). O15.1.</p>	<p>No change proposed. The statement factually sets out the context which Merton faces in addressing its housing targets and delivery and does not provide an encouragement to those wishing to build on green spaces. The Plan is required to be read as a whole. Paragraph 11.2.3 states that 'All housing development proposals will be required to meet the requirements of all relevant local plan policies including those contained in the following chapters: <i>Climate Change; Places and Spaces in a Growing Borough; Health and Well Being; Transport and Urban Mobility and Infrastructure.</i>'</p>
523	112		Wimbledon Society	12 Places and Spaces	D12.2 urban design	Part F, p411	MM116	<p>p411 D12.2F Amend: The proposed removal of the policy on identifiable public spaces is <b>NOT ACCEPTED AND SHOULD BE RE-INSTATED</b>.  Reason: <i>the importance of clearly defining public and private spaces has been a cornerstone of 'designing out crime' for some years, and has credibility in use. The Council's wording has merit</i></p>	<p>No change proposed. MM204 was made to avoid unnecessary repetition as per paragraph 16 of the NPPF and the policy is already addressed at part (d) which states "<i>Ensure that the form and layout of new development is street-based with clearly identifiable publicly accessible streets and spaces, defined by buildings that actively front the street, which maximise the number of entrances onto the street and create defensible space and facilitate natural surveillance.</i>"</p>
524	112		Wimbledon Society	12 Places and Spaces	D12.1 Delivering well designed and resilient neighbourhoods	Para D12.1.1 p408	MM116	<p>Support the reference to supporting documents produced by other bodies:  Add: However, given the growing encouragement for positive involvement by local people, it would be desirable to include a reference eg ".....Good Practice Advice Notes, AND PUBLISHED DESIGN GUIDES FROM LOCAL GROUPS. These provide detailed guidance and advice...."  Page 6 of 13Reason: In the past, the Council has formally adopted such guidance eg a planning Brief produced by the Society (Atkinson Morley site), and also utilised the many local road townscape surveys by the Society and local groups.</p>	No change proposed Para 12.1.1 lists the types of guides produced by the London Borough of Merton. This does not preclude design guides being produced by local groups.
525	112		Wimbledon Society	12 Places and Spaces	D12.2 urban design	Part B	MM116	<p>Amend: The proposed removal of the policy on the permeability of new development to pedestrians and cyclists is not accepted, and <b>SHOULD BE RE-INSTATED</b>. Reason: <i>blocks to easy public movement through the Borough can be alleviated by the incorporation of new routes, and the Council's original wording has much merit.</i></p>	No change proposed. This is deleted as national policy (NPPF para 16) requires no unnecessary repetition and the issue is already contained in the Local Plan at D12.3 and in the sustainable transport policies
526	112		Wimbledon Society	12 Places and Spaces	D12.2 urban design	Part M P412	MM116	Support the inclusion of the sustainability approach to design	Support welcomed

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527	112		Wimbledon Society	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	Part F P418	MM213	<p>p418 D12.3F The proposed removal of the policy on providing appropriate levels of daylight and sunlight to adjoining buildings and gardens is STRONGLY RESISTED AND SHOULD NOT BE ACCEPTED. It should BE RE-INSTATED USING THE SPECIFIC WORDING "AND GARDENS". Reason: Constantly one sees proposals that severely adversely affect the daylight and privacy of the neighbouring properties, contrary to (for example) the standards set out in the definitive BRE document on Daylight and Sunlight 2022. EG: On each common boundary, a new building should not penetrate an inclined plane* of 43 degrees from the top of a 1.6m notional fence (ref: 2.3.10a). (* This phrase is specifically used by HMG in the current public consultation on Permitted Development). In designing a new development it is important to safeguard the daylight to nearby buildings (2.2.1) And also to gardens and open spaces (3.3.1).</p> <p>That developers (and even skilled building professionals) consistently fail to understand these most basic neighbour protection standards in their planning applications is a constant source of concern for neighbours, for local people and for the Society. There is a failure to understand the basic requirements, that daylight and privacy standards need to be respected to the whole of an adjoining site (not just the property windows), and this policy (currently DMD2 in the 2014 Local Plan) is the only "protective guidance" that Councils, (and those affected by development proposals, and local people) have. The Council's current approach has great merit and should continue. p418 D12.3f Relocate: Rather than be classed as people-focussed, might this policy be better located within the "context" or building design section, being easily measurable in physical terms?</p>	No change proposed. National policy (NPPF para 16) prevents unnecessary repetition in local plans and the issue of acceptable light and privacy levels for existing and future residents and requiring a high standard of amenity for the development and its surroundings is also addressed in the same policy, point (g).
528	112		Wimbledon Society	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	P418 D12.3C	MM212	<p>p418 D12.3c Add: This suggested Policy should be EXPANDED TO INCLUDE THE NEED TO AVOID THE SHADOWING OF THE SOLAR PANELS ON ADJOINING PROPERTIES Reason: Solar Panels work properly only when direct sunlight reaches them, and shadowing by new adjoining development needs to be avoided. The generation of electrical energy, its use in the building, and its exporting to bolster local energy production should now be prioritised.</p> <p>If 10 or 12 solar panels were installed in only half (c5,000) of the current stock of semi-detached houses in Merton, the projected electrical energy generation could approach some 15 million kWh annually by 2050. The potential generation from roof top PV's on housing in Merton might approach 50-80 million kWh by 2050. Therefore, when designing new development, the protection of existing or potential future rooftop Solar Panel generation on neighbouring properties (including non-residential) should now be seen as highly sustainable, and comparable in importance to protecting their daylighting.</p>	No change proposed. MM212 states <i>Demonstrate they do not unduly prejudice development opportunities on neighbouring sites, including across borough boundaries</i> which is considered to adequately address the representation.
529	112		Wimbledon Society	12 Places and Spaces	D12.3 Ensuring high quality design for all developments	P423		<p>p423 D12.3.6 Add: The proposed text should include a reference to "providing good levels of daylight into the dwellings" but also to their sites/gardens, ie "PROVIDE A GOOD LEVEL OF DAYLIGHT AND PRIVACY TO BOTH DWELLINGS AND GARDENS".</p> <p>Reason: as for D12.3F above.</p>	No change proposed. This matter is already reflected in policy 12.3 part (g) and para 12.3.11 which states <i>External amenity space of all kinds must also be fit for purpose, have sufficient privacy, preferably be of a regular shape and receive as much as daylight and sunlight as possible. Communal amenity space provides breathing space between buildings and an opportunity for neighbours to meet and socialise.</i>
530	112		Wimbledon Society	12 Places and Spaces	D12.5 managing heritage assets	D12.5.Aii, P432	MM15	<p>p432 D12.5A ii. Add: The removal of the reference to Merton's Conservation Area Character assessments and guidance etc IS NOT ACCEPTED AND SHOULD BE REINSTATED.</p> <p>Reason: These documents contain a wealth of local knowledge and understanding, something that no developer can hope to match. Local groups (including the Society) have themselves contributed to this invaluable stock of information over many years, and it should continue to provide a resource for both developers and their architects. Indeed, many applicants currently use these assessments in their D &amp; A Statements.</p>	No change proposed. MM15 required to remove reference within planning policies to having to comply with guidance (e.g. SPD, conservation area character appraisals etc) as this is contrary to the NPPF. Guidance is still referred to in supporting test and we agree that such guidance is an invaluable stock of information and should be referenced as guidance for planning applications.
531	112		Wimbledon Society	12 Places and Spaces	D12.5 managing heritage assets	P435		<p>p435 Support the addition of Locally Listed Buildings etc as Heritage Assets (see comment at Appendix: 7.4.2).</p>	Support welcomed.
532	112		Wimbledon Society	12 Places and Spaces	D12.6 Tall Buildings	P437		<p>p437 D12.6.1ABE Omit: The reference to tall buildings being suitable for parts of Wimbledon Town Centre is not accepted. Instead, a height limits Policy should be established.</p> <p>The phrase "and Wimbledon Town Centre" therefore SHOULD BE REMOVED.</p> <p>Reason: Local people have consistently said that buildings above about 6 storeys are not needed or desirable, are out of scale, and create an inappropriate identity and character. Also, authoritative studies are showing that higher buildings use more energy, and are sustainably less efficient.</p>	No change proposed. This matter was discussed extensively at the hearings in June and October 2022. Please see Document 9D1 Future Wimbledon Supplementary Planning Document which demonstrates that there are existing buildings in Wimbledon that are taller than 6 storeys
533	112		Wimbledon Society	12 Places and Spaces	Strategic Heights Diagram	See comments - various pages.		<p>Strategic Heights Diagram: Support the suggested references to "Subject to all other Policy requirements" in the key panel.</p> <p>This makes clear that higher structures are only acceptable when other Policy constraints are met. p442 Omit: The indicative location of tall buildings up to 40m IS NOT SUPPORTED. In any event the dotted orange boundary of the western section would anyway need to be SIGNIFICANTLY RE-DRAWN, AND MINIMISED:</p> <p>(a) to avoid going outside the defined Town centre;</p> <p>(b) avoid including Tabor Grove, St George's Road and Ashbourne Terrace, which all have small scale properties/housing;</p> <p>(c) it should entirely avoid the Queen's Road and Broadway properties in the Wimbledon Broadway Conservation Area, with their Listed and Locally listed buildings;(the dot indicating the Locally Listed Police Station seems to be missing);</p> <p>(d) It should entirely avoid sites Wi 16 and Wi 11, (both of which are partly within the conservation area);</p> <p>(e) It should entirely avoid including properties that lie between the two Conservation Areas of Wimbledon Broadway and South Park Gardens:</p> <p>Reason: the introduction and encouragement of very much higher buildings within and beside these conservation areas would significantly damage their inherent character and design quality. This is contrary to Strategic objective 5g, Policy N9.1e (which protects the historic WTC core from taller building), Policy N9.1 item o (which promotes conservation area protection), and Policy D12.5bcdef.. To be consistent, the various site descriptions need to be amended accordingly (p301 – 345), Page 8 of 13</p> <p>p442 Omit: The indicative location of tall buildings of up to 48m IS NOT SUPPORTED: This reference should be removed entirely.</p> <p>Reason: as above for p437 – p442. Croydonisation should not be a model.</p>	Amendment proposed to Wimbledon Strategic Heights diagram to ensure as far as is possible that the indicative building heights lines fall within the town centre boundary and reflect the evidence plot by plot, based on evidence including the Future Wimbledon SPD, Merton's Borough Character Study and Conservation area character appraisals
534	112		Wimbledon Society	12 Places and Spaces	D12.5 managing heritage assets	P435, Para12.5.6		<p>p435 12.5.6 Update: As the Archaeological Priority Zones have been superseded, should not the entry now read "ARCHAEOLOGICAL PRIORITY AREAS WITH TIERS 1, 2, OR 3 (DESIGNATED HA)? Reason: Archaeological Priority Area Tier 4 is a "catch-all" covering the whole of the Borough that is not in Tiers 1, 2, or 3. So without this qualification the whole of the Borough would become a Heritage Asset.</p>	No change proposed. Please see Document 12D17 Historic England's London Borough of Merton Archaeological Priority Areas 2016 <a href="https://historicengland.org.uk/content/docs/planning/apa-merton-pdf/">https://historicengland.org.uk/content/docs/planning/apa-merton-pdf/</a> which clarifies that areas defined as APAs are Tiers 1-3 and Tier 4 is defined on page 8 as being outside an APA "Tier 4(outside APA) is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area."
535	112		Wimbledon Society	12 Places and Spaces	D12.6 Tall Buildings	P444 PARA 4		<p>p444 12.6.6 paragraph 4: Omit: Asking developers to produce design briefs for their development site is both naive and wrong. It is analogous to "marking one's own homework", and IS NOT SUPPORTED.</p> <p>Reason: As Michael (now Lord) Heseltine recently wrote: "The Market has no morality" (6/2023).</p> <p>Add: Such briefs should be produced by the Council as planning authority, ideally with local involvement.</p> <p>Accordingly, the text should instead read: " .....PLANNING AND DESIGN BRIEFS WILL BE PREPARED FOR THESE SITES BY THE COUNCIL IN CONJUNCTION WITH LOCAL GROUPS."</p> <p>Reason: Central Government has rightly been promoting the early involvement of the public in the design of development projects (eg NPPF 40 and 131). The production of planning guidance for intending developers should be seen as an essential role of the local planning office, acting positively, and taking advice from local groups and interests. Local people should be given the opportunity to be involved in the production of design briefs, rather than being left for Councils and developers to produce in secret. The public planning system designs and plans the town, the scheme architect plans and designs the building: not the other way round. As someone once said: Whose town is it anyway?</p>	No change proposed. National government policy (NPPF para 132 and National Model Design Codes) permits local planning authorities and developers to produce design codes.
536	112		Wimbledon Society	12 Places and Spaces	D12.6 Tall Buildings	P444 para12.6.6	MM255	<p>p444 12.6.6 paragraph 6: The seemingly tacit acceptance that "harm" to the historic environment can be acceptable, provided that enough so-called "justification" is provided IS NOT SUPPORTED.</p> <p>Omit: Instead, the policy and paragraph should simply read ".....TALLER BUILDINGS SHOULD AVOID HARM TO THE SIGNIFICANCE OF HERITAGE ASSETS".</p> <p>Reason: National Policy on the protection of heritage is clear, and giving "ways round" such a Plan Policy makes it worthless in practical use. It is counter-productive, and would lead to mis-use and loss of heritage.</p> <p>Firmly controlling taller buildings in relation to the historic environment should be a given.</p> <p>"Once lost, heritage is lost forever".</p>	No change proposed. NPPF chapter 16 sets national policy for considering heritage assets, stating at para 206 "Any harm to, or loss of, the significance of a designated heritage asset from its alteration or destruction, or from development within its setting), should require clear and convincing justification." The council's policy is in line with this.
537	112		Wimbledon Society	12 Places and Spaces	D12.7 Advertisements	P445 para a	MM255	<p>p445 D12.7 para A: Add: The omission of "the character of an area" IS NOT SUPPORTED, and SHOULD BE REINSTATED.</p> <p>Reason: Local Character is not the same as "amenity". The Council's wording has merit.</p>	No change proposed. NPPF para 141 states that <i>Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts</i> so the amendment is required to ensure the plan conforms with national policy..

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538	112		Wimbledon Society	12 Places and Spaces	D12.8 Digital infrastructure	Par c P447		p447 D12.8C vi Digital Infrastructure: Add: It would be helpful if the supporting text on p448 could specifically say that, because the (usually five) current equipment boxes beside the masts are large, ugly & uncoordinated in design, design-led solutions are very much needed. Reason: Such equipment – largely within the public highway - is very visible, and the current design quality is unthinking, and a significant blot on the landscape. National priority for the expansion of the system should be matched by a need for high grade industrial design in the townscape.	No change proposed. Agree that telephone equipment can detract from the streetscene by their appearance and location. Part C parts I to vii sets out criteria to ensure that "Proposals for telecommunications apparatus and equipment should be designed and located such that they do not detract from the visual quality, enjoyment and useability of the public realm or detract from the setting and context of buildings and the street scene."
539	112		Wimbledon Society	12 Places and Spaces	D12.9 Shop front design and signage	Part Diii P449		p449 D12.9Dii Support the new approach to the installation of near-solid shop front shutters.	Support welcomed
540	112		Wimbledon Society	12 Places and Spaces	D12.11 Basements	Part J P454		p454 D12.11J Basements: Add: To the suggested text should be added: ".....SEWER FLOODING. PERMISSION FOR NEW BASEMENTS WILL NOT BE APPROPRIATE IN DEFINED FLOOD ZONE AREAS". Reason: to reduce risk, both to people (eg bedrooms where sleeping or immobile occupants can be overwhelmed) and to property.	No change proposed. All development, including basements, are required to consider and manage risk of flooding from all sources, not only fluvial flooding (which has defined flood risk zones)
541	112		Wimbledon Society	12 Places and Spaces	D12.11 Basements	P457		p457 D12.10.16 New Basements under Heritage Assets: Add: Suggested addition to the revised text: ".....without causing harm to the significance and structural integrity of the asset, AND ITS IMMEDIATE NEIGHBOURS. Where a level of harm ..." Reason: particularly in a terrace of old cottages etc, where the original foundations are by modern standards minimal, the introduction of a new strong basement foundation in one property inevitably leads to movement in the adjoining weaker foundations, and disturbance to the building above.	No change proposed. Not all immediate neighbours will be proximate enough to a basement development to be affected in all cases.
542	112		Wimbledon Society	12 Places and Spaces	D12.11 Basements	P458 para 12.10.19		p458 12.10.19 Omit: The suggested new phrase that basements "will be supported" in conservation areas IS NOT SUPPORTED. Instead it should read "will ONLY be supported if.....". Reason: basements are potentially disruptive to building character, structural stability of neighbouring property, and hydrology, and should only be accepted if they pass clear critical criteria.	No change proposed - not necessary for the plan's soundness
543	112		Wimbledon Society	13 Economy	EC13.5 Merton's town centres and neighbourhood parades	P490 13.5C		p490 13.5c New Map of centres: Add: It would be helpful if the new map could include (perhaps by a simple symbol) the location of SIMILAR CENTRES IN THE ADJOINING BOROUGH. Reason: A London Borough is not an island, and the entirely normal crossing of boundaries for recreation, for shopping, for education etc etc should ideally be reflected in the map.	Amendment proposed to map formatting for clarity
544	112		Wimbledon Society	14 Infrastructure	IN14.1 Infrastructure	P509 14.1.15		Chapter 14: Infrastructure p509 14.1.15 Add: The Council should work with the water companies to ensure that there is adequate water and waste water infrastructure TO SERVE THE BOROUGH (not just "new developments". Reason: the present drainage infrastructure is clearly not sufficiently robust, (eg flooding at Raynes Park), and needs significant capacity upgrades. Climate Change is predicted to generate more "surplus water events". The great majority (c80 - 90%?) of the Borough will not be developed over the next 30 years, and relying on just "new development" to deal with the need to significantly upgrade our largely Victorian system is clearly not enough.	No change proposed. The council works with water companies to provide capacity for clean water and wastewater services in its role as the Lead Local Flood Authority (as well as via the Local Plan for new developments)
545	112		Wimbledon Society	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	P535		Support the addition of the references to improving biodiversity.	Support welcomed
546	112		Wimbledon Society	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	Part D		Support the addition of a 10m wide buffer strip beside a watercourse. (spelling "where")	Amendment proposed. Spelling correct in MM291
547	112		Wimbledon Society	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	Part F		Add: Restricting the responsibility for addressing access to nature to only "major" development IS NOT SUPPORTED. The Council's original wording ("ALL") should be retained. Reason: In the same way that lost trees are required to be replaced in development projects (see O15.4f below), so should the loss of nature be compensated for in virtually all developments.	No change proposed. MM292 added to O15(f) to ensure that the policy is justified as not all development can viably and practically reduce deficiencies in access to nature.
548	112		Wimbledon Society	15 Green and Blue Infrastructure	O15.4 Protection of Trees, Hedges and Other Landscape Features	Part B p.541		Add to the suggested revision, last line: "...a financial contribution of the full cost of appropriate re-provision WITHIN THE BOROUGH will be required." Reason: to clarify that the nature benefit should stay in the Borough and not be exported to an outside agency. Mind-full of the somewhat discredited system of carbon offset payments, which seemingly "export" benefits via intermediaries to where they are 'out of mind', local re-provision ensures that the finance, as well as the product, can be locally and properly monitored by the Council.	No change proposed. In the majority of cases the financial contribution will be spent in appropriate locations and sites within the borough but there may be instances, e.g. at sites near the borough boundary where, for best arboriculture and/or ecological reasons, it might be more appropriate to spend the financial contributions on nearby sites within neighbouring boroughs. The proposed amendment is not necessary to make the draft local plan 'sound'.
549	112		Wimbledon Society	15 Green and Blue Infrastructure	O15.4 Protection of Trees, Hedges and Other Landscape Features	p.542		On replacement trees, Add "...of amenity AND ECOLOGICAL value, to consist of appropriate species native to the UK AND OF A TRUNK GIRTH THAT MATCHES THE GIRTHS OF THE LOST TREES".Reason A: Adding 'ecological' reflects the growing understanding that the planning system should not limit tree protection to "amenity" (ie appearance), but now include a rather wider view of nature. Reason B: To ensure that the loss of what often are significant mature trees is not "balanced" by the introduction of the same number of saplings, which have no chance of emulating the ecological, scenic, and aesthetic benefit of the lost trees for perhaps 30 or more years. A case could be made for not just matching girth, but for a say 50% increase in conservation areas, and a 100% increase for lost TPO trees. (This girth-replacement approach is known by the Society as the "Luckhurst Principle", named after the Council's late Arboricultural Officer, who advocated this approach).	No change proposed. This matter was considered at the Local Plan hearing and no modifications were proposed to change the approach from using British Standards.
550	112		Wimbledon Society	15 Green and Blue Infrastructure	P15.10 air quality, pollution and land stability	15.10 / p.572		Supporting Text: This reads as a Policy, & should therefore ideally be relocated to para ff.	Support welcomed
551	112		Wimbledon Society	15 Green and Blue Infrastructure	P15.10 air quality, pollution and land stability	15.10.7 / p.575		Note "we" and "us"	No change proposed. The style is used throughout the draft local plan.
552	112		Wimbledon Society	15 Green and Blue Infrastructure	P15.10 air quality, pollution and land stability	15.10.23 / p.578		Support the addition of a construction and noise etc SPD.	Support welcomed
553	112		Wimbledon Society	16 Sustainable Travel	T16.2 Prioritising active travel choices	Para 16.2.4 P588		Support the inclusion of the Council's own assessment that "cycle and pedestrian provision in Merton is not of adequate standard in all areas". Support: for the "production of a cycling and walking strategy..... setting out detailed proposals for cycle and pedestrian routes".	Support welcomed
554	112		Wimbledon Society	16 Sustainable Travel	T16.2 Prioritising active travel choices	Para 16.2.4 P588		Add to the suggested text revision: "...detailed proposals for cycle and pedestrian routes INCLUDING SOME PEDESTRIANISATION IN TOWN CENTRES over the Plan period". Reason: Networks link places, and many of the places are local and town centres. Almost all are dominated by traffic, and this is hampering not only the viability and character and safety of the centres, but discourage natural walking for pleasure. Positively improving the pedestrian experience has been a powerful tool in rejuvenating many town centres throughout western Europe since the 1970's, and the Plan should encourage it. If the centre is uncomfortable and unwelcoming for pedestrians, they will not stay there, they will "shop and go". Retaining footfall is one of the essential requirements for a resilient town centre.	No change proposed. Should pedestrianisation take place of any part of the borough it could happen outside the planning system.
555	112		Wimbledon Society	16 Sustainable Travel	Table 16.1 Indicative list of transport schemes	p.607-9		List of Transport Schemes: Support for the revised texts on TN 1, 2, 3, 4, 8, 9, 11, 12, 13, 14.	Support welcomed.
556	112		Wimbledon Society	17 Monitoring Framework	M17.1 Monitoring	17.1.5 / p.611	MM350	Add: The list of bodies and agencies that the Council will "work with" should surely include LOCAL GROUPS? Reason: "Our Town Our Plan" should be the mantra. The town is an expression of local peoples' identity, the recognisable physical focus of their community. Pride in their town is key to its continuing success. * This indeed was the title of the comprehensive Plan produced by the Society and some 19 local groups in 1984, to counter the much-opposed plan by the then Council.	Amendment proposed to MM350 para 17.1.5 bullet point four to read <a href="#">"Engaging with residents, businesses, community groups, developers and landowners to identify and try to resolve barriers to delivery."</a>
557	112		Wimbledon Society	17 Monitoring Framework	M17.1 Monitoring	p.614-684	MM350	70 numbered pages not present	Amendment proposed to adjust the Microsoft automatic page numbering system to ensure page 613 is followed by 614 etc
558	112		Wimbledon Society	17 Monitoring Framework	M17.1 Monitoring	p.686	MM350	Add: It would be helpful if each column on each page could have its title	Amendment proposed to provide title to columns on last page (seems to be an issue with Microsoft Word)
559	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p.687	MM350	Add: Should Air Quality fall below target levels, then an additional Local Plan Policy initiative could include T16.2.4 (PEDESTRIANISATION), T16.2.4 (IMPROVED CYCLING AND WALKING): Page 11 of 13 Reason: Whilst producing new Council documents may sometimes help, positive action by the Council with its direct power to act, has an important part to play.Words sometimes need to be backed up by positive intervention.	No change proposed. Improvements to cycling and walking infrastructure are already part of the Local Plan. The Local Plan does not include significant proposals for pedestrianisation, which could take place outside the planning system.
560	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p.688	MM350	Add: Should Biodiversity fall below target levels, in Contingency (c) "THE COUNCIL WILL CONSIDER ACQUIRING SUITABLE LAND AREAS FOR APPROPRIATE ENHANCEMENT";(eg Lessa Sports Ground?)Reason: whilst the production of new Council documents may sometimes be needed, initiating on the-ground positive action by the Council, together perhaps with local guerrilla gardening groups, has a part to play, setting an example, leading from the front	No change proposed. The council is targeting its resource in improving the habitats for nature reserves and other land it owns.
561	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p.691	MM350	Add: Should Heritage and Archaeological and Landscape fall below target levels, then in (c) "THE COUNCIL WILL CONSIDER ACQUIRING THE HERITAGE ASSET, AND UNDERTAKING THE REMEDIAL WORKS". Reason: The Council has clear powers to intervene, where deterioration of the asset is not able to be remedied by its current owners.	No change proposed. This proposal is not deliverable across all heritage assets in Merton

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562	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p694	MM350	p694 Add: Climate Change: Indicators should also include: numbers of solar panels installed: ditto heat pumps: reduction targets for gas importation into the Borough: amount of locally generated electricity within the Borough: Reason: Such simple targets can be a practical and easily understood measure of progress towards 2050.	No change proposed. The council is not aware of any organisation which measures fossil fuel transfer by borough boundary. Solar panels can be installed under permitted development rights without contacting the council. The number of solar panels is not the sole indicator of indicator of energy generation.
563	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p694	MM350	p694 Add: Climate Change: Contingency column should include "THE COUNCIL WILL PROMOTE/SUPPORT GROUP-BUYING SCHEMES FOR SOLAR PANELS & HEAT PUMPS". Reason: Group buying schemes can lower the price and guarantee the quality of work. The solar panel group-buying scheme recently run by the Council (with other SW London Councils) has been very successful in encouraging wide take-up, and this should be accelerated.	No change proposed. This is covered by Merton's Climate Strategy and Action Plan. <a href="https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change">https://www.merton.gov.uk/planning-and-buildings/sustainability-and-climate-change</a>
564	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p697	MM350	p697 Add: Sustainable Transport: Monitoring information SHOULD INCLUDE (D) LENGTH OF FULLY SEGREGATED CYCLE PATHS". Reason: Given that the present cycle network is "not adequate" (in the Council's words), and upgrading it is part of the Plan (T16.2.4), then progress towards achieving the segregated network needs to be monitored.	No change proposed. The council will continue to work with TfL in improving cycling infrastructure in Merton.
565	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	P701	MM350	p701 Add: Safe Environments: The Monitoring indicator column SHOULD ALSO CONTAIN FIGURES ON CRIMES against the person and/or property as (b). Reason: Unsafe places need identification and remediation.	No change proposed. This information is publicly available on Met Police website.
566	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p702	MM350	p702 Design: A poorly designed environment will in part be identified by local people whose town it is. Involvement by the public in the evolution of development projects needs to be commonplace. ADD AS (A) "INPUT FROM THE DESIGN REVIEW PANEL AND LOCAL AMENITY GROUPS". Reason: Their assessment and ideas for improvement should be regarded as a resource rather than an irritant. The developer only owns the site, but the local community "owns" and lives and gives life and prosperity to the town and the wider locality.	No change proposed. The council encourages applicants to engage early and proactively with the local community before submitting a planning application and supports Merton's Design Review Panel.
567	112		Wimbledon Society	17 Monitoring Framework	Table 17.1 Monitoring Framework	p704	MM350	p704 Economic Growth and Town Centres: Amend: The Topic (first column) should not be to "increase" the vitality and viability etc, but to "ENSURE". Reason: the pursuit of "increase" can lead to overheating of the development market, the creation of out-of-scale crude developments so as to maximise CIL payment receipts, and loss of character: followed by even more decline. Croydonisation should not be a model	Amendment proposed to MM350 Monitoring table section 20 To ensure the vitality and viability of existing town centres, local centres and parades. It should be noted that Merton Council does not charge Community Infrastructure Levy on most commercial developments
568	112		Wimbledon Society	18 Appendices	P15.10 air quality, pollution and land stability	P742		p742 ADD: The Schedule of Locally Listed Buildings (a non-designated Heritage Asset). Reason: As these are specifically mentioned in 12.5.6 they need to be included	No change proposed. A link to the borough's schedule of locally listed buildings is given in paragraph 12.5.15 which is the most up to date source of information.
569	112		Wimbledon Society	18 Appendices		p707		p707 Appendices: None of the following have been checked for completeness or accuracy in the limited time available: Superseded Policies Table Open Space – MOL Open Space – Allotments and Farms Open Space – Churchyards and Cemeteries Open Space – Education Open Space – Other	No change proposed; no main modifications identified for review in this part of the representation.
570	112		Wimbledon Society	18 Appendices		p721		p721 Nature Conservation – Site of Special Scientific Interest (SSSI) Special Areas of Conservation (SAC) Sites of Metropolitan Importance for Nature Conservation SINC Site of Borough (Grade 1) Importance for Nature Conservation Site of Borough (Grade 2) ditto Site of Local Importance for Nature Conservation Local Nature Reserves Green Corridors	No change proposed; no main modifications identified for review in this part of the representation.
571	112		Wimbledon Society	18 Appendices	P15.10 air quality, pollution and land stability	p727		p727 Metropolitan Open Land (MOL) boundaries and changes Cannon Hill Lower Morden Beverley Brook (query is the map correct?) Copse Hill Wimbledon Common (no changed boundaries) Mitcham Common (no changed boundaries) Morden Park Wandle Valley	No change proposed; no main modifications identified for review in this part of the representation.
572	112		Wimbledon Society	18 Appendices		p741, 742, 752, 753		p741 Conservation Areas Historic Parks & Gardens p742 Listed Buildings grades 1, 2* and 2 Archaeological Priority Areas (APA's) Tier 1, Tier 2, Tier 3 p752 Scheduled Ancient Monuments p753 Flooding Tests and Assessment Employment Opportunities Marketing and Vacancy criteria Glossary p792 Policies Map: This has not yet been made available on-line.	No change proposed. An interactive policies map has been available online since July 2021 and has been considered during the examination hearings. Please see the Policies Map button on Merton's new Local Plan website including Interactive map of the Draft Policies Map showing data layers as published in July 2021 and where appropriate, duplicate layers that show subsequent proposed modifications <a href="http://www.merton.gov.uk/newlocalplan/policies-map">www.merton.gov.uk/newlocalplan/policies-map</a>
573	113		Wimbledon Swifts	15 Green and Blue Infrastructure	O15.3 Biodiversity and access to nature	para 15.3.19 page 515	AM281	Regarding Additional Modification ref. AM281 (page 515, plan ref. 15.3.19), 'AM281 515 15.3.19 ... Applicants will be expected to provide details of such features as part of planning applications and should refer to best practice guidance when designing a development, including that prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Swift Conservation Group.'  Comment: The proposed Additional Modification will not clarify guidance on best practice with regard to swift conservation, as it gives a link to a non-relevant web page (on biodiversity net gain), so this link is incorrect. Also, the reference made to the 'Swift Conservation Group' is confusing and unhelpful as this organisation does not exist. Please correct the CIEEM reference as given below, and add a reference to the recently introduced British Standard BS 42021 for integral nest boxes.  Therefore, the new text (suggested below) would refer to the CIEEM article and the British Standard BS 42041, links as stated: "... Applicants will be expected to provide details of such features as part of planning applications and should refer to best practice guidance when designing a development, including guidance prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM): <a href="https://cieem.net/resource/the-swift-a-bird-you-need-to-help/">https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</a> and the British Standard BS 42021 for integral nest boxes: <a href="https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard">https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard</a> .'	Amendments proposed. MM281 is proposed to be amended with updated hyperlinks and text as recommended: <i>"Applicants will be expected to provide details of such features as part of planning applications and should refer to best practice guidance when designing a development, including that prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM) and the British Standard BS 42021 for integral nest boxes."</i>



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574	114		<b>Wraght.V</b>	04 Mitcham	Mi16 Mitcham Gasworks			I would like to object to the size of the proposed housing development on the old gas works site. The main reasons are that the local doctors surgeries are over subscribed, NHS dental practices are near capacity. There are not enough supermarkets to support such a large increase in population. Schools will not be able to absorb the additional places needed. The tower blocks on Phipps Bridge were pulled down and now they want to put 10 storey blocks in the centre of Mitcham. Mitcham is congested now so what will it be like with all the additional vehicles on the narrow local roads as well as the air pollution.I have lived in Mitcham for over 45 years and watched it deteriorate more and more to become unrecognisable to the bustling village feeling that it had. There used to be a good variety of shops but now there are too many of the same businesses. The banks have all gone except for Lloyds. The police station is only open a few hours a day, drugs are openly traded in the street, gangs are in operation with shootings and stabbing incidents occurring more frequently, flytipping is now the norm. Please sort out the many problems that exist now before bringing in such a large population which will only add to the problems.	No change proposed. Mitcham Gasworks is large site at 2.4 hectares and can contribute to providing a substantial number of new homes, including affordable homes, for Merton residents. The Local Plan proposals are supported by evidence including Merton's Infrastructure Delivery Plans which demonstrates that supporting infrastructure (school places, NHS investment, digital infrastructure etc) can support development proposals in the Local Plan. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
575	115		<b>Zammataro.M</b>	04 Mitcham	Mi16 Mitcham Gasworks		MM62	I email you today about the objections of MM62 Mitcham Gasworks. The main issue is 650 homes are too dense ,to high ,they are not in keep with the area, they will causing overcrowded location ,noise,parking issue etc. This modifications is base in "reflect local aspirations " Local people and myself reject the plan of 9 storey and all evidence been the street audit ,petition over 600 signatures and emails towards our councillors. Our councillors included the green part give they own objection so I kindly ask you to object the MM62 plan Mitcham Gasworks .	No change proposed. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
576	116		<b>Zammataro.M</b>	04 Mitcham	Mi16 Mitcham Gasworks		MM62	I object the current planning MM62 for the following reason 500/650 home ,10 store height are inappropriate for the location for every aspect. The previous planning application up to 9 storey has received from the local resident and from surround area hundred of objection including a street audit and over 600 signature in petition plus various email. I also like to remind that even our Councillors ,Green Party object at so huge and dense plan. I would like as a Merton Council to rejected the modification	No change proposed. The Mitcham Gasworks site was discussed at the Planning Inspectors public hearings in June 2022 (see Matter 13 <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements</a> ) and September 2022 (see Matter 8, including a topic paper on Mitcham Gasworks) <a href="https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2">https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission/hearing-statements-2</a>
577	117		<b>Zeidler, A</b>	General comment - Whole Plan	Strategic Heights Diagram			My comments for consideration by the Inspectors are primarily twofold: First, the plan allows for buildings that are simply too high. I don't want Wimbledon to become a second Croydon. Second, there needs to be more environmental protections. The Hillside/Wimbledon Strategic Heights Diagram outlines an area marked in black where inspectors suggest that heights of up to 24 meters may be appropriate. This area extends from the gardens in Mansel Road, down a portion of Malcolm Road (where Luma used to be), through the alleyway to the east side of Tabor Grove, and down Alt Grove to the railway line. It encompasses the high end of Mansel Road (excluding the school) and the beginning of Woodside, both of which currently have tall buildings. Additionally, it includes the conservation area around Wimbledon Hill Road and St. Mark's Square, which predominantly features pretty, low-rise, locally listed, or residential structures. We need lower buildings in this area, not higher ones! Within this area, there are two designated development zones that overlap due to computer-generated ellipses. In these zones, inspectors consider buildings of up to 40 meters and 49 meters to be appropriate. However, these proposed heights are not absolute maximums. The discretion exists to build shorter or taller structures as deemed appropriate. Nevertheless, the combination of this provision and the stepping provision concerning land adjacent to the allocated strategic height areas raises concerns about potential height creep. Specifically, there is apprehension that taller buildings may encroach upon the quiet residential streets behind St. George's Road, near Tabor Grove, and within the low-rise areas around St. Mark's Square and certain parts of Alexandra Road.	Amendment proposed to Wimbledon Strategic Heights diagram to ensure as far as is possible that the indicative building heights lines fall within the town centre boundary and reflect the evidence plot by plot, based on evidence including the FutureWimbledon SPD, Merton's Borough Character Study and Conservation area character appraisals
578	118		<b>Zeidler, E</b>	09 Wimbledon	Strategic Heights Diagram			I would like to bring two key points to your attention regarding the Hillside/Wimbledon Strategic Heights Diagram: Building Heights: The current plan permits buildings that I believe are excessively tall. I am concerned that Wimbledon might eventually resemble Croydon which is not desirable. We need to strike a balance between development and maintaining the character of our area. Environmental Protections: Additionally, there must be stronger environmental safeguards. While development is essential, we should prioritize preserving our surroundings and heritage. Details from the Diagram: The black-marked area suggests that heights of up to 24 meters may be appropriate. This zone encompasses various locations, including Mansel Road, Malcolm Road (formerly Luma), Tabor Grove, and Alt Grove. Notably, it covers the high end of Mansel Road and the Woodside area, both of which currently have tall buildings. Within this area, there are two designated development zones. These zones overlap due to computer-generated ellipses. Inspectors consider buildings of up to 40 meters and 49 meters appropriate. However, these proposed heights are not rigid maximums; flexibility exists based on appropriateness. Despite protective factors like exemplary design and impact assessment, there is concern about potential height creep. Specifically, taller buildings could encroach upon the quiet residential streets near St. George's Road, Tabor Grove, and the low-rise areas around St. Mark's Square and Alexandra Road. Thank you for carefully considering my input.	Amendment proposed to the indicative strategic heights diagram for Wimbledon to align with the policy as written Wimbledon town centre that supports buildings with a range of height commensurate to existing Wimbledon town centre building heights and on consideration of character and appearance.
579	119		<b>Zeidler.I</b>	09 Wimbledon				I have significant concerns regarding urban development in Wimbledon My comments concern in particular Hillside. Environmental Safeguards: Furthermore, we need robust environmental protections. While growth is essential, we must prioritize safeguarding our surroundings, green spaces, and historical context. Factors like exemplary design, a strong PTAL (Public Transport Accessibility Level), and thorough impact assessments should guide our decisions.	Support welcomed. Policy N9.1 contains proposals for these requirement such as N9.1 c. <i>Enhancing the experience for people coming to Wimbledon commensurate to its international reputation by requiring exemplary design and landscaping, street scene and public realm investment, taking the Healthy Streets Approach including opportunities to green Wimbledon</i>
580	119		<b>Zeidler.I</b>	09 Wimbledon	Strategic Heights Diagram			Building Heights: The current plan allows for buildings that I consider unacceptably tall. I fear that Wimbledon could eventually resemble Croydon, which is undesirable. We must strike a better balance between development and preserving our area's unique character. While taller structures may find a place, we cannot ignore their impact on our local landscape and heritage.	Amendment proposed to the indicative strategic heights diagram for Wimbledon to align with the policy as written Wimbledon town centre that supports buildings with a range of height commensurate to existing Wimbledon town centre building heights and on consideration of character and appearance.
581	120		<b>Wimbledon Park Residents Association</b>	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	This paper responds to Merton's request of 2 February 2024 for views on the latest Main Modifications proposed to their Local Plan. It deals with the new policy N8.1 for Wimbledon Park, and its implications for the rest of the Plan. [officers' note: see original response for contents and all footnotes and hyperlinks]	No change proposed; none requested in this part of the representation.
582	120		<b>Wimbledon Park Residents Association</b>	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	1.1 Site Allocation W13 of part of Wimbledon Park having gone, the Local Plan now tries to address "Heritage at Risk" of the whole of Wimbledon Park at considerable length in N8.1. For the reasons discussed in section 2, it is disproportionate and ineffective. We respectfully suggest that it makes the Plan unsound, and so propose a simpler, effective solution.	No change proposed; covered elsewhere in response to the details of the representation
583	120		<b>Wimbledon Park Residents Association</b>	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	1.2 Heritage at Risk  The problem of "Heritage at Risk" can be simply resolved at an appropriate place in the Plan. 1.2.1 Changes requested: delete N8.1 altogether and insert after D12.5 (f): D12.5 (g) Proposals affecting any heritage asset on the "at risk" database must address and resolve the reasons why it is on that database	No change proposed. Please see Documents INSP22 and INSP23 which recommend a policy approach to Wimbledon Park, addressing heritage at risk, historic and nature conservation, access, landscape management, environmental quality, support for long term investment in sporting facilities etc

	A	B	C	D	E	F	G	H	I
584	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>1.2.2 Reasons:</p> <p>1.2.2.1 Policy D12.5 already deals with Heritage but does not currently mention Heritage at Risk. At the end of D12.5 (f) a new Modification now provides: "Proposals should not prejudice the future restoration of designated and non-designated historic parks and gardens." This is not ambitious enough. It does not respect and would not resolve any "at Risk" issues. 1.2.2.2 There are 21 sites within Merton on the Historic England "Heritage at Risk" database.1 None of the other 20 sites are singled out, even though 5 are in St Mary's Churchyard, Wimbledon, and another 4 in the environs of Merton Priory. The general approach of a Borough-wide policy must be the most appropriate for HaR assets.</p> <p>1.2.2.3 The HaR database is a living creature. Assets are added and removed all the time as Historic England re-assess them and modify the stated reasons for an asset appearing on the database.2 Work may be undertaken to alleviate problems associated with heritage assets, the effect of which must be re-assessed from time to time. The lake at Wimbledon Park is a good example of this, as illustrated in the MM N8.1.29. A 15-year Plan Policy which identifies a single location, at a single point in time, based on inadequate and potentially changing circumstances is disproportionate, uncertain, and unsound.</p> <p>1.2.2.4 N8.1 does not follow Historic England's advice.3 It provides merely that a development proposal which includes certain features "will be supported". This will not secure the objective. Merton's lack of support through the planning process will not prevent a developer from securing consent in some other way: an Inspector on appeal would not regard "support" to mean "require", so Merton's conditions may not be delivered.</p> <p>1.2.2.5 Merton's proposed "support" would be promoting development to resolve the Heritage at Risk issue. Resolution should not be contingent on development. It would be a contradiction in terms to rely upon a developer's offer of funds or other benefits associated with its planning application to protect a site such as Wimbledon Park for which the planning policy barriers to development are so high. The development process cannot fulfil the objective alone, hence our proposal at 1.3 below.</p>	No change proposed. Please see Documents INSP22 and INSP23 which recommend a policy approach to Wimbledon Park, addressing heritage at risk, historic and nature conservation, access, landscape management, environmental quality, support for long term investment in sporting facilities etc. Wimbledon Park is by far the largest and most significant asset on the Heritage at Risk Register in Merton. The Park also has other significant uses and planning designations. It is proportionate and appropriate to include it in the Local Plan
585	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>1.3 Landscape Management Plan</p> <p>We share the general frustration exhibited by Historic England, many local and other national bodies, and the entire community, that the whole of Wimbledon Park deserves much better. We would welcome an initiative comprising all the landowners, interested parties and bodies, and both Merton and Wandsworth Councils, to achieve this.</p> <p>1.3.1 Change requested: insert in the Surrounding Neighbourhoods section for Wimbledon: (r) Wimbledon Park is an important open space, designated MOL, Grade II*, SINC and others, but it has been on the Heritage at Risk register since 2016. To address this Risk, and to ensure that public access and sporting use is perpetuated, we will secure the production of a Landscape Management Plan and further designate Wimbledon Park as a Local Green Space.</p>	No change proposed Section B of N8.1 states <i>Prepare a landscape management plan, in collaboration with all landowners, to co-ordinate the long-term management and maintenance of Wimbledon Park</i> . Wimbledon Park has significant planning designations and this Local Plan does not propose to add Local Green Space, which must, according to NPPF para 106 be "local in character and is not a significant tract of land"
586	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>1.3.2 Reasons:</p> <p>1.3.2.1 It would be proportionate to include Wimbledon Park in the Surrounding Neighbourhoods section of the Chapter about Wimbledon, and briefly to explain its status.</p> <p>1.3.2.2 The N8.1 proposals for a Landscape Management Plan give no confidence that this can be legally achieved and that it has the backing of the Council. Perhaps for that reason, the proposal is at best a vague and misleading aspiration.</p> <p>1.3.2.3 To be effective, the Landscape Management Plan should be more than aspirational, and Merton must be committed to it. Resolution of the Heritage at Risk issue should not be contingent only on development, for the reason mentioned at 1.2.2.5 above.</p> <p>1.3.2.4 While a Landscape Management Plan might be a useful means to achieve the objective, there is no guidance in N8.1 about its terms of reference or brief, beyond addressing the "Heritage at Risk" problem. Since "divided ownership" is the key issue, it must start with the owners. How will Merton ensure that it will be agreed? See also section 5 below.</p>	No change proposed Section B of N8.1 states <i>Prepare a landscape management plan, in collaboration with all landowners, to co-ordinate the long-term management and maintenance of Wimbledon Park</i> . This does not preclude a landscape management plan being prepared and agreed between landowners outside the planning system.
587	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>2 Background and Reasons for our Approach</p> <p>2.1 After a lengthy series of Stages, representations and hearings in the seven-year process for this Plan, we are grateful to the Inspectors for rejecting the extension of development Site Allocation W/3. Wimbledon Park is "chalk" to the "cheese" of the AELTC's existing private tennis complex. We are also grateful that the Inspectors have rejected the reduction in MOL on the existing AELTC site west of Church Road. We do not see the need to comment further but, if other parties re-visit either of those changes, reserve the right to make further representations.</p>	No change proposed; none requested in this part of the representation.
588	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>2.2 Following the Hearings in 2022 there was just one residual concern about Wimbledon Park: it is on the Heritage at Risk register, about which "something must be done".</p> <p>2.2 The policies set out generally in the Local Plan already cover the key features of Wimbledon Park: for example, Metropolitan Open Land, Heritage, Site of Importance for Nature Conservation, Conservation Area, Open Space, Green Corridor, Archaeological Priority, Sports, and Recreation. However, MM N8.1 disproportionately draws attention to some only of these features, ignores others, and includes considerable detail of temporary, passing interest but not of 15-year value. It also continues to promote development according to the AELTC planning application for only part of the Estate, which was dismissed by the Inspectors at the Hearings in 2022.</p> <p>2.4 MM N8.1 occupies 10 entirely new pages in the Plan, while the whole of Wimbledon and surrounding areas is dealt with in text, pictures, maps and further supporting text in just 17 pages. If each of the issues relating to other places around the Borough were treated in the same way as Wimbledon Park the Plan should run into thousands of pages</p>	No change proposed; none requested in this part of the representation.
589	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>2.5 This Local Plan has been the subject of four Stages of Public Consultation over the last 7 years.4 During this process, nothing was proposed about Wimbledon Park except at the instigation of the AELTC for an extension to their existing private tennis complex. Their first representation at Stage 1 concerned only the existing complex west of Church Road, seeking a Site Allocation which became the original W/3.5 In their second, Stage 2 response, they welcomed the inclusion of their existing complex as W/3 and told Merton that they were about to acquire the golf club.6 In their third, at Stage 2A two years later, they explained that they had bought the golf club and were making plans to develop it, and so welcomed the extension of W/3 to include the golf course as well.7 It was the extension of this allocation and the incorporation of AELTC-proposed drafting and requirements which was the subject of our, and other, objections in 2021 and 2022, and the subject of extensive hearings before the Inspectors.</p> <p>2.6 According to the Local Plan Examination Library (the only materials available to the public) Historic England became involved on the record only when they responded to Inspectors' questions in relation to Site Allocation W/3, supplying a Hearing Statement dated 19 May 2022 and, later, a revised Statement of Common Ground in September 2022. Their observations were concerned only with the Heritage status of the golf course, and whether W/3 was sound. They concluded that it was not.</p>	No change proposed; none requested in this part of the representation.
590	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>2.7 Merton's reason for their introduction of MM112, the new policy N8.1, is "To achieve an effective and justified policy, which is consistent with national policy relating to the conservation of heritage assets (section 16 of NPPF) and the natural environment (section 15 NPPF), and to secure general conformity with the London Plan in respect of provisions relating to Metropolitan Open Land."8</p> <p>2.8 We understand that in creating MM N8.1, Merton have followed the Inspectors' Post Hearings letter INSP22 paragraph 39. That letter denied a Site Allocation, which would have encouraged development, and explained: "... This modification should address the reasons why the heritage asset is at risk, nature conservation and access, and landscape management and maintenance, in addition to setting out any requirements to improve the environmental quality and accessibility of the park. In our view, such an approach would provide for the conservation, enhancement and ongoing management of the registered park and garden, whilst also ensuring that clear support is given for continued long-term investment in AELTC's facilities."</p>	No change proposed; none requested in this part of the representation.
591	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>2.9 It seems that Merton have sought to introduce MM N8.1 to satisfy the first requirement ("This modification should address the reasons ... park and garden"). However, the second ("whilst also ... facilities") is provided for in the rest of the Plan which already supports the AELTC, both through the revised Site Allocation W/3 for their existing facilities west of Church Road, and through Text and Policies at 9.1.27, 13.9.5, IN14.3, and 14.3.38-40. 2.10 Is it possible that Merton have interpreted the second, support for "continued long-term investment in AELTC's facilities", to refer still to the golf course, despite the withdrawal of the site allocation? W/3 having been restricted, this does not seem correct, appropriate, or fair. If there is any misunderstanding about this, we would welcome clarification. If that is in fact Merton's intention, then a further hearing must be required: it would not be acceptable for the effect of Site Allocation W/3 to appear in another guise. 2.11 At this very late stage, a year after the post-hearings' letters, detailed changes of the magnitude now proposed by Merton are out of proportion with all other Main Modifications and the expectations of all consultees and of due process. N8.1 now proposed would need far more analysis and scrutiny than this stage permits. We therefore suggest something much simpler to make the Plan sound and effective.</p> <p>2.12 While we share the Inspectors' desire to avoid any further hearings, it would not be right, or in accordance with due process, for Merton to press ahead with N8.1 without a thorough discussion and analysis of it. We stand ready to appear at any hearing if required. In the meantime, we should be happy to discuss these representations with Merton.</p>	No change proposed; none requested in this part of the representation.
592	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3 Specific adjustments to the Main Modification now proposed.</p> <p>3.1 We urge Merton Council and the Inspectors to adopt our preferred, simple approach set out at section 1 above. If despite our concerns, this is not accepted, then we need to propose several changes to N8.1, as follows.</p>	No change proposed; none requested in this part of the representation.

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593	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p><b>3.2 N8.1</b>  <b>3.2.1 Change requested:</b>  <b>Delete the opening words of this Policy and substitute:</b>  <b>WIMBLEDON PARK – POLICY N8.1</b>  <i>Wimbledon Park is an important open space, designated MOL, Grade II*, SINC in a Conservation Area and an Archaeological Priority Area, but it has been on the Heritage at Risk register since 2016. To address this Risk, and to ensure that public access and sporting use is perpetuated, we will secure the production of a Landscape Management Plan and further designate Wimbledon Park as a Local Green Space.</i>  <i>We will require development proposals for any part of Wimbledon Park to address and resolve the reasons why Wimbledon Park is on the Heritage at Risk Register in accordance with Policy D.12.5(g), and to recognise and preserve its special status as designated protected land. Once Wimbledon Park has been removed from the Heritage at Risk database this requirement will cease.</i>  <i>Whether or not suitable development proposals come forward, we will complete a Landscape Management Plan for Wimbledon Park within 1 year of the adoption of this Plan with the agreement of London Borough of Wandsworth, all landholders, Ward Councillors, community groups, Civic Societies and Residents' Associations neighbouring, or having an interest in the use of, the Estate. The plan will address the "at Risk" concerns and be paid for out of Merton Council funds. We will procure the implementation of the Landscape Management Plan within 5 years of the adoption of this Plan</i></p>	No change proposed. Wimbledon Park is a Registered Historic Park and Garden. It also has biodiversity designations and is substantially used for sport and recreation. MM112 (policy N8.1) addresses all these matters, not only the heritage aspects. A landscape management plan may be prepared via a Local Plan policy requirement or separately from the Local Plan
594	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.2.2 Reasons:  3.2.2.1 To comply with Historic England's advice (see 1.2.1 above). As it stands, the proposal to "support development" appears to create a policy to support a strategic priority for development, and thus implement section 19 (1B) and (1C) Planning and Compulsory Purchase Act 2004. Site Allocation W13 sought to do this and has been rejected: concern over development was the primary reason for removing the golf course from W13. Now Policy N8.1 appears to do it instead. It is not acceptable.</p>	No change proposed. Wimbledon Park is a Registered Historic Park and Garden. It also has biodiversity designations and is substantially used for sport and recreation. MM112 (policy N8.1) addresses all these matters, not only the heritage aspects. A landscape management plan may be prepared via a Local Plan requirement or separately from the Local Plan
595	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.2.2.2 This will also require the insertion of D12.5(g) as proposed at paragraph 1.2 above.</p>	No change proposed. Please see Documents INSP22 and INSP23 which recommend a policy approach to Wimbledon Park, addressing heritage at risk, historic and nature conservation, access, landscape management, environmental quality, support for long term investment in sporting facilities etc.
596	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.3 N8.1 paragraphs (a) – (j)  3.3.1 Change requested:  Delete paragraphs (c) and (g). Re-order the remaining lettered paragraphs in the sequence of the Supporting Text so that they can be followed logically.</p>	No change proposed. Paragraph c requires the production of a landscape management plan to co-ordinate long-term management and maintenance of Wimbledon Park (as raised by Historic England during the examination to help address one of the reasons why the Park is on the Heritage at Risk Register). Paragraph (g) refers to the removal of non-native trees and insensitive planting, recommended by the 2006 Wimbledon North Conservation Area Character Appraisal to help restore the historic landscape and improve views. Both are justified for retention.
597	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.3.2 Reasons:  3.3.2.1 The retained paragraphs relate to the Historic England "at Risk" reasons or could be consistent with any landscape management plan for Wimbledon Park. However, (c) and (g) go far wider and deeper than is required to counter the four reasons for Historic England "at Risk", currently set out in N8.1.12.9. These two paragraphs (c) and (g) were introduced in the MM by the words "supporting development proposals that". This is the promotion of development, not the careful curation of a sensitive, at-risk site. Merton's "support" for development is not appropriate in N8.1 since this must replace a development Site Allocation. The former golf course is only one part of Wimbledon Park, the subject of a highly contentious application and these two paragraphs repeat, and favour, elements of the existing AELTC proposal 21/P2900, which is not appropriate.  3.3.2.2 A Landscape Management Plan will need to include more than the paragraphs that remain, and this Policy already risks becoming too long. Merton may care to consider just how much detail is necessary in this Policy, lest it overwhelms the entire Plan.</p>	No change proposed. Paragraph c requires the production of a landscape management plan to co-ordinate long-term management and maintenance of Wimbledon Park (as raised by Historic England during the examination to help address one of the reasons why the Park is on the Heritage at Risk Register). Paragraph (g) refers to the removal of non-native trees and insensitive planting, recommended by the 2006 Wimbledon North Conservation Area Character Appraisal to help restore the historic landscape and improve views. Both are justified for retention. A Local Plan applies to development proposals. Referencing to requiring development proposals to produce a Landscape Management Plan does not preclude producing a landscape management plan independent of specific development proposals.
598	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.4 N8.1 Paragraph 8.1.3  3.4.1 Change requested:  After "... is currently publicly accessible" insert:  <i>The golf course land is held by AELTC on a separate lease which entitles residents of Merton to play at reduced green fees without requiring membership. The AELTC have now closed the golf course, of their obligations as trustees of the public trust under which they held the freehold of the golf course, park, and lake (see section 6 below). The AELTC bought the golf course company in 2018 but kept the 1986 lease alive. That lease continues until 2041, beyond the life of this Plan.</i></p>	No change proposed, not necessary for the soundness of the plan
599	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.4.2 Reason:  Merton required public access "pay and play" rights when it granted the lease to the golf club company in 1986 in the face of a public outcry against renewal of a lease which contained no such rights and even included the public lake.10 No doubt Merton were aware of their obligations as trustees of the public trust under which they held the freehold of the golf course, park, and lake (see section 6 below). The AELTC bought the golf course company in 2018 but kept the 1986 lease alive. That lease continues until 2041, beyond the life of this Plan.</p>	As above - no change proposed, not necessary for the soundness of the plan
600	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.5 N8.1 Paragraph 8.1.3  3.5.1 Change requested:  Delete:  The All England Lawn Tennis Club's main grounds lies [sic] to the west of Wimbledon Park across Church Road and a commercial arrangement with the other owners to provide land for car parking, overnight camping, the Queue and concessions in the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park.</p>	Amendment proposed to provide a factual update to the status of planning application 21/P2900. Planning applications references are provided in all relevant places in the Local Plan for context. No change proposed to the remainder of the text as all land ownerships have supported the Wimbledon Championships function for more than a decade; this can require temporary planning permissions for temporary structures.
601	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.5.2 Reasons  3.5.2.1 N8.1.3 deals with land ownerships. The words which we suggest should be deleted add nothing but favour the AELTC to the exclusion of any other interest and contradict the expressed purpose of N8.1.  3.5.2.2 The ownership and use of neighbouring land is irrelevant, just as it would be irrelevant to refer here to St Mary's Church as a nearby listed religious building.  3.5.2.3 There has been a commercial arrangement between Merton and AELTC, which may well change, to use not the "whole park", but most of the public park to support the championships.  3.5.2.4 The subjective comment "successful functioning of the Championships" is inappropriate. Many would challenge this and prefer that the public park should not be used for these purposes now that the AELTC own the heritage golf course, so that the public can continue to enjoy their entire park throughout the whole year.  3.5.2.5 Reference to a specific planning application is inappropriate, for the many reasons already discussed before the Inspectors, and should be deleted. This Plan is to last 15 years and should not be seen to favour any particular application. While Merton Planning Committee passed the application by a majority 6:4, Wandsworth refused it unanimously 7:0, especially because it failed to satisfy the stringent tests for development of Metropolitan Open Land. It is now before the GLA. Its fate is far from certain.</p>	Amendment proposed to provide a factual update to the status of planning application 21/P2900. Planning applications references are provided in all relevant places in the Local Plan for context. No change proposed to the remainder of the text as all land ownerships have supported the Wimbledon Championships function for more than a decade; this can require temporary planning permissions for temporary structures.
602	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>3.6 N8.1 Paragraph 8.1.3  3.6.1 Change requested:  Insert at the end:  Merton holds its part of Wimbledon Park as public open space as trustee under the statutory trust of s164 Public Health Act 1875. The sale of the golf course to the AELTC in 1993 has been disputed and the AELTC may be found to hold it on a similar trust. On their purchase in 1993 the AELTC covenanted with Merton as owner of the public park not to develop the golf course and to use it for restricted sporting purposes. Dealings with the statutory trust landholdings of both parties and by Merton with the benefit of the covenants are restricted by the Local Government Act 1972 (as amended).</p>	No change proposed; not necessary for Local Plan soundness.

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603	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.6.2 Reasons: 3.6.2.1 The Wimbledon Park Estate (except The Wimbledon Club) was transferred from the Wimbledon Corporation to Merton by The London Authorities (Property Etc.) Order 1964 (SI No 1464) and appropriated to the s164 PHA Trust by The London Government Order 1965 (SI No 654). Since 1965 it has been held by Merton on the statutory public trust. 3.6.2.2 If the supporting text of the Policy is to personalise the landholdings, it should explain constraints as severe as the restrictions imposed by the statutory trusts and the 1993 covenants. Merton and AELTC have now been made aware of these issues. There is no dispute about the status of Merton's holding of the public park, and it is desirable to ensure that the corporate memory of Merton and the public retain knowledge of that status. 11 3.6.2.3 For more detail about the 1993 Covenants and the Public Trust, please see section 6 below.	No change proposed; not necessary for Local Plan soundness.
604	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.7 N8.1 Paragraph 8.1.4 3.7.1 Change requested: Insert at the end: <i>It should be noted that the tests for approving development of MOL under the NPPF are even more stringent than those applied to Heritage Assets. "Inappropriate development is, by definition, harmful ... Substantial weight must be given to any harm ... potential harm must be clearly outweighed.."</i>	No change proposed as MOL is addressed elsewhere in the Local Plan. Paragraph 8.1.4 states <i>"The whole of Wimbledon Park is designated as Metropolitan Open Land, designated Open Space and Green Corridor. Wimbledon Park lies within Wimbledon North Conservation Area and a Tier 2 Archaeological Priority Area. Except for the public park, the site lies within a Site of Importance for Nature Conservation (SINC) Borough Grade 1. These designations are addressed by other policies in the Development Plan"</i>
605	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.7.2 Reason: For balance. Applications to develop Metropolitan Open Land must clear a hurdle even higher than that for heritage assets	No change proposed as MOL policy is addressed elsewhere in the local plan
606	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.8 N8.1 Sports, recreation, and play Paragraph 8.1.7 3.8.1 Change requested: Delete the sentence comprising: "NPPF paragraph 98 states ... climate change." Insert in its place: Merton Council will safeguard the open space and uses of the Wimbledon Park Estate in accordance with NPPF Chapter 8 Promoting healthy and safe communities, paragraphs 96 to 107. Merton Council hereby designates that part of Wimbledon Park which is in Merton as a Local Green Space and will urge Wandsworth Council to designate that part in Wandsworth also as Local Green Space. Merton Council will also require and enforce Community Use Agreements in accordance with 14.3.44 and 14.3.45 of this Plan.	No change proposed. This section is under the heading "Sports, recreation and play" and is appropriate to reference NPPF paragraph 98. Wimbledon Park has a significant number of planning designations and the Local Plan does not propose to add Local Green Space, which the NPPF states is not suitable for extensive tracts of land.
607	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.8.2 Reasons: 3.8.2.1 The Plan already deals with sports generally in Chapter 14, Infrastructure, which applies to facilities required for people in the Borough. Through this Policy Merton wish to single out Wimbledon Park, to "recognise and support its sporting, recreation, ecological and amenity functions". It would therefore be most appropriate and meaningful to attribute a further designation, and the criteria for Local Green Space fit perfectly.13 3.8.2.2 Sports use will not itself mitigate the problems of Heritage at Risk, the primary justification for N8.1. It is simply incidental to and descriptive of the current use of Wimbledon Park, and to save the heritage asset it must also comply with other planning policy restrictions. 3.8.2.3 For more detail about this reason, please see section 4 below.	No change proposed. This section is under the heading "Sports, recreation and play" and is appropriate to reference NPPF paragraph 98. Wimbledon Park has a significant number of planning designations and the Local Plan does not propose to add Local Green Space, which the NPPF states is not suitable for extensive tracts of land.
608	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.9 N8.1 Paragraph 8.1.8 3.9.1 Change requested: Insert at the end: In 1986 Merton Council renewed the lease of the golf course on terms that 75% of membership should comprise residents of Merton and that any residents could play golf at substantially reduced green fees without becoming members. This public access continued when Merton sold the freehold reversion to the lease to the AELTC in 1993. The AELTC bought the golf club company in 2018 but have since denied public access. Merton will take steps to reinstate access for the public to the whole of the golf course.	No change proposed. The issue of whether the golf club was a private members club and public access was discussed at the Local Plan hearings in 2022.
609	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.9.2 Reason: The golf course is 40% of Wimbledon Park, and a critical part of the sports facilities available. Since its closure in 2022, public access has been prevented and should be reinstated throughout, whether for golf or an alternative public sport.	No change proposed. The issue of whether the golf club was a private members club and public access was discussed at the Local Plan hearings in 2022.
610	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.10 N8.1 Paragraph 8.1.11 3.10.1 Change requested: Insert at the end: Wimbledon Park is just one of many sites in Merton currently (2024) on the Historic England "Heritage at Risk" database. We will monitor this database regularly and ensure that any changes that may affect Wimbledon Park are considered in the context of the Landscape Management Plan anticipated by this Policy. When Wimbledon Park leaves the "At Risk" database, this Policy will cease.	No change proposed. Policy N8.1 addresses biodiversity, sport and recreation and other aspects as well as the historic environment. It is not intended that this policy would cease should the Park be removed from the HAR register.
611	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.10.2 Reason: The database will constantly change. The purpose of this Policy is to resolve the current status of Wimbledon Park. Is there any reason to continue it when that purpose is satisfied	No change proposed. Policy N8.1 addresses biodiversity, sport and recreation and other aspects as well as the historic environment. It is not intended that this policy would cease should the Park be removed from the HAR register.
612	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.11 N8.1 Addressing the future of the historic landscape and landscape management Paragraph 8.1.17 3.11.1 Change requested: Insert at the end: Whether or not suitable development proposals come forward, we will complete the Landscape Management Plan for Wimbledon Park within 1 year of the adoption of this Plan with the agreement of London Borough of Wandsworth, all landholders, Ward Councillors, community groups, Civic Societies and Residents' Associations neighbouring, or having an interest in the use of, the Estate. The plan will address the "at Risk" concerns and be paid for out of Merton Council funds. We will procure the implementation of the Landscape Management Plan within 5 years of the adoption of this Plan. 3.12.3 The whole community is concerned about the future of Wimbledon Park and regard it as a public asset. Merton is trustee for the community and this amendment seeks to ensure that Merton complies with its obligations as trustee. 3.12.2 Reasons: 3.12.1 To meet the requirements of the Policy as amended. For further details please see section 5 below. 3.12.2 According to Merton's Planning Officer's report to committee on 21/P2900, the AELTC's s106 proposals include a landscape management plan. This Policy should not be contingent on that application. If a Landscape Management Plan is contingent on any development proposals, it may never happen. If the Heritage at Risk problem is so important, its resolution should not be treated as a sweetener or bargaining chip in any particular application.	No change proposed. Wimbledon Park is a Registered Historic Park and Garden. It also has biodiversity designations and is substantially used for sport and recreation. MM112 (policy N8.1) addresses all these matters, not only the heritage aspects. A landscape management plan may be prepared via a Local Plan policy requirement or separately from the Local Plan.
613	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.13 N8.1 Addressing obscured views Paragraphs 8.1.22 and 8.1.23  3.13.1 Changes requested: Delete from 8.1.22 (a): "and on the former golf course". Delete the whole of 8.1.23 (a). 3.13.2 Reason: Removal of the golf course planting is a specific requirement of the AELTC application 21/P2900 to make space for their comprehensive development. It is not justified for any other purpose and would cause harm to protected wildlife and the loss of carbon captured. It should not be part of this policy, but considered, if at all, in the context of any specific planning application and an overall landscape management plan.	No change proposed. Please see 12D9 - Merton Conservation Area Character Appraisal for Wimbledon North (Wimbledon Park section 2) 2006 which states at paragraph 12.21.1 <i>"Negatives. Issues relating to the historic character of the Park landscape.... Insensitive tree and other planting on golf course"</i> This is also referred to in 12.15.3 under "Views" which states <i>Regrettably, some views are partly obscured by the concrete wall to the boundary of the golf course, and/or are marred by course tree and other planting which has no reference to the historic landscape"</i>
614	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.14 N8.1 Addressing the deterioration of the Lake Paragraph 8.1.29 3.14.1 Change requested: Insert at the end: The process of desilting of the lake needs further justification and research in view of the harm which it will cause. We will commission further reports to update that already obtained by us from Salix Ecology in 2018 ( <a href="https://www.merton.gov.uk/system/files?file=preliminary20ecological20appraisal.pdf">https://www.merton.gov.uk/system/files?file=preliminary20ecological20appraisal.pdf</a> ) and take further advice before considering any measures to deal with silt in the lake. We will not proceed with any de-silting without ensuring on the best advice available that it is necessary and if so, that it is undertaken in the least harmful way possible. If there is any doubt about this advice, we will take no action to de-silt the lake. In any event we will require that silt traps are installed on the drains and tributaries feeding the lake to prevent any further silting.	No change proposed. Please see Document LBM10 Wimbledon Park masterplan which has an action to de-silt the lake

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615	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.14.2 Reasons: 3.14.2.1 The Salix report commissioned by Merton in 2018 has not been disclosed. Merton will be aware that it cast considerable doubt on the need for an method of achieving de-silting and recommended further investigations. 3.14.2.2 A long time has passed since the 2014 inspection report mentioned in N8.1.29, and much work has since been undertaken. This needs to be evaluated and assessed in the light of the latest data and technical knowledge before potentially great harm is done to the environment. 3.14.2.3 To ensure that harmful interventions are not made unless clearly necessary. 3.14.2.4 To ensure that adjoining landowners recognise their responsibility to mitigate any problems of silting.	No change proposed. Please see Document LBM10 Wimbledon Park masterplan which has an action to de-silt the lake
616	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.15 N8.1 Addressing the deterioration of the lake Paragraph 8.1.30 3.15.1 Change requested: Insert at the end: We will ensure that within 5 years of the adoption of this Plan the public will enjoy dedicated perpetual rights of access on a hard-surfaced walk and cycleway at least 3 metres wide on land around the lake at a distance from the edge sufficient to protect wildlife in the lake. These rights will be exercisable at all times when the public park is open and will be under the control of no person except Merton Council as trustee of the public park. We will acquire any rights over the land of others needed to implement this commitment, for which we will make the necessary resources available.	No change proposed. Section d. states <i>Improve public access around the whole lake, alongside protecting the lake's functions in relation to biodiversity, sport, public safety and flood risk, while ensuring compliance for reservoir safety.</i> The council is supportive of a public path around the lake, however wildlife in the lake is just one of the considerations in designing and implementing this.
617	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	3.15.2 Reasons: 3.15.1 The 1993 covenants included an obligation on AELTC to dedicate a walkway around the lake. We are glad to see a nod in the direction of this covenant at N8.1.d. "Improve public access around the whole lake". However, N8.1.30 as it stands is weak and will not achieve the objective. 3.15.2 Merton have long held the ambition to create such a walkway. It was the first requirement of their committees when contemplating the freehold sale in March 1993.14 A dedicated route around the lake was promised by the AELTC in the 1993 covenants "as soon as golf ceases". Golf ceased in December 2022, but the AELTC are resting on the specious argument that the lease, which they also own but have not yet merged with the freehold, must come to an end before the obligation arises. 3.15.3 The "dedication" expected by the 1993 covenant and repeated here has a technical meaning that it will be permanently available to the public like a public footpath or highway. The current AELTC proposal is that the walkway they offer will be "permissive" only, and under their control.	No change proposed. Section d. states <i>Improve public access around the whole lake, alongside protecting the lake's functions in relation to biodiversity, sport, public safety and flood risk, while ensuring compliance for reservoir safety.</i> The council is supportive of a public path around the lake, however wildlife in the lake is just one of the considerations in designing and implementing this.
618	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	4 Sport and Recreation: further Comments 4.1 These topics are already dealt with under Chapter 14, Infrastructure, a general heading for facilities required for people in the Borough. Instead of opening with a cross-reference to that policy, N8.1 mentions only NPPF 98 (now 102) but no more: it fails to mention NPPF 107.15 4.2 N8.1 is not appropriate because it singles out one site in a disproportionate way, but then so does part of Chapter 14. Is it intended that N8.1 should prevail over the provisions of Chapter 14, Infrastructure, where Merton promotes policies for sport and recreation: "Policy IN14.3 Sport and Recreation: We are committed to helping our residents lead healthy and active lifestyles and improve mental well-being, through sport and recreation. We will:" or is it intended that Chapter 14 should prevail over N8.1, suggested by: "IN14.3e. Recognise the All England Lawn Tennis Club as being an internationally significant sporting venue." 4.3 Much is made of the AELTC tennis complex as a jewel in Merton's crown, which no-one denies. But that complex is for entertainment, charging visitors to watch professionals, which brings economic benefits to Merton. It does not satisfy the requirements of the London Plan 8.3.1 and does not provide sports or recreation facilities for the people of Merton.	No change proposed. NPPF paragraph 107 references policies for Local Green Space which is not relevant to policy N8.1.
619	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	4.4 This confusion must be resolved. We appreciate that at this very late stage we must deal only with recent Main Modifications, but as it stands the Plan is unsound. The retention of N8.1 must require the modification of Chapter 14. Even if N8.1 goes, which we would prefer, we respectfully submit that N8.1 shows why Chapter 14 is the wrong place to promote the AELTC tennis complex. It sits naturally in Chapter 13 ("Economy and Town Centres"), at 13.8.18-21, currently headed "Protection of leisure and entertainment facilities", which should then be headed "Protection and Promotion of leisure and entertainment facilities". 4.5 Either way, whether N8.1 remains or goes, the effect of the change in the Site Allocation W13 should be reflected in Chapter 14 where the emphasis must be on what the existing complex (not the complex which might result from a contested and undecided planning application), and indeed all other stadia in the Borough, can deliver for the benefit of all people in the Borough, consistent with the purpose of Chapter 14.	Amendment proposed to paras 14.3.39 and 14.3.40 <i>14.3.39 Policy S5 of the London Plan recognises that specialist sporting venues and stadiums, such as the AELTC venue, have a vital role to play in enabling wider access to sport, as well as having an important cultural value.</i> <i>14.3.40 Further details on the AELTC sites can be found in the <a href="#">Raynes Park and Wimbledon chapters neighbourhood-policy</a>.</i>  Amendment for accuracy to ensure Site RP5 (AELTC community sports venue) is included.
620	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	4.6 The problem is that the current Chapter 14 goes on to develop the promotion of the AELTC including: <i>14.3.39 Policy S5 of the London Plan recognises that specialist sporting venues and stadiums, such as the AELTC venue, have a vital role to play in enabling wider access to sport, as well as having an important cultural value.</i> 4.7 This is based on an incorrect premise: the London Plan's concept of sport and recreation is not public entertainment but participatory sport and recreation. Without actual public activity on their sites, specialist stadia cannot "widen access". For example (London Plan, Pages 230-1): "5.5.1 Sport and recreation facilities are important components of social infrastructure. Both formal and informal facilities should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. 5.5.5 Specialist sporting venues and stadiums also have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value." 4.8 This acknowledges specialist venues and stadia, but also requires that they must provide facilities for public use and wider access. It would be more accurate to rephrase 14.3.39 as follows: "14.3.39 Pursuant to policy S5 of the London Plan, specialist sporting venues and stadiums will be required to play a role in providing facilities to enable wider access to sport." 4.9 If N8.1 had been raised at an earlier stage in the Local Plan process, such that this confusion over sporting facilities in the Borough could have been resolved more broadly, we would have pressed for more detail about what this "role" entails. At the minimum, faced with the disproportionality of N8.1, this is the least that could be done.	Amendment proposed to paras 14.3.39 and 14.3.40 <i>14.3.39 Policy S5 of the London Plan recognises that specialist sporting venues and stadiums, such as the AELTC venue, have a vital role to play in enabling wider access to sport, as well as having an important cultural value.</i> <i>14.3.40 Further details on the AELTC sites can be found in the <a href="#">Raynes Park and Wimbledon chapters neighbourhood-policy</a>.</i>  Amendment for accuracy to ensure Site RP5 (AELTC community sports venue) is included.
621	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	5 Can a Landscape Management Plan be effective?  5.1 At the heart of the Historic England concerns is "The impacts of divided ownership on landscape management". N8.1 suggests that the solution is to "... support development proposals that ... b. Prepare a landscape management plan, in collaboration with all landowners, to coordinate the long-term management and maintenance of Wimbledon Park".	No change proposed, not recommended in this part of the representation
622	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	5.2 As mentioned at 1.2.2.2 above, the MM is not saying that a development proposal must include anything, not even the preparation of a landscape management plan, simply that a development proposal which includes it will be supported. 5.3 Part of the Registered Park and Garden is within the London Borough of Wandsworth. A Statement of Common Ground between Merton and Wandsworth refers to the AELTC planning application and is based on the Stage 2A Site Allocation W13.16 Merton have not, apparently, consulted with Wandsworth on the Modifications now under consideration, but rely on the SCG paragraph 5.52: "Whilst there are a number of shared assets of heritage and conservation importance between Merton and Wandsworth (see section 4 above and section 5 reference to the AELTC planning application at Wimbledon Park), this has not been identified as a strategic or cross-boundary issue." 5.4 A lot has happened since January 2022 when that SCG was signed. The future of the Wimbledon Park Estate is clearly strategic and has become a cross-boundary issue. Wandsworth refused the AELTC planning application in November 2023 especially on the ground that no "very special circumstances" exist to allow development of this Metropolitan Open Land. While the Registered Park is in both Boroughs, Merton's Local Plan cannot apply to the section in Wandsworth. Not only is there divided ownership, but also divided jurisdiction, and a divided approach to development decisions. Merton's Local Plan cannot resolve the at-risk issues alone. There appears to have been no effort since January 2022 to involve Wandsworth, and without their involvement, the MM is unfortunately unsound.	No change proposed. A Local Plan applies to development proposals. Referencing to requiring development proposals to produce a Landscape Management Plan does not preclude producing a landscape management plan outside the planning system. LB Wandsworth was consulted at post hearings stage and LBM and LBW have continued to undertake ongoing duty to co-operate meetings on planning matters, most recently in January 2024 with another Duty to Co-operate meeting being scheduled between the two boroughs for early June 2024.

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623	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>5.5 Owners of land not part of any development proposal would be under no compulsion to assist another's application. This was raised, and we thought deal with at the Inspectors' Hearings. Merton have confirmed that no other parties have been involved in the preparation of N8.1, so nobody knows if the other landowners would make a legal commitment at this stage.17 There is no legal process by which all three landowners could be so compelled. Unless Merton can demonstrate that all landowners have legally committed to it now, the promise is illusory. It must be for Merton to take the initiative to resolve this problem.</p> <p>5.6 A "Memorandum of Understanding" about Wimbledon Park has existed between the three landowners for several years, but no action at all has been taken. In any event, during the 15-year life of this Local Plan, circumstances may change, and, as lack of progress on even the MOU illustrates, no landowner would be interested in tying its hands for so long. Merton should also be aware of, but the MM does not mention, its own initiative which appears to have come to nothing. Merton themselves commissioned a masterplan for the park and lake in 2018, costed at about £20m.18 This does not appear to have been pursued.</p> <p>5.7 There remains a deep feeling of frustration and sadness among the local community that the three landowners are not able to come together, but instead that one pursues its own ends. Unfortunately, without a pre-existing commitment, this policy would not appear to be the appropriate means to bring all interested parties together; it is unsound and would be ineffective. This Association would welcome an active and purposeful dialogue.</p> <p>5.8 The topic of a combined management plan was raised at the Hearings. There has been no discussion about it in the intervening 18 months, during which a consensual Modification could have been discussed. It appears again now but still fails to address the key concerns then raised.</p>	No change proposed. Various projects from the 2018 Wimbledon Park masterplan have been delivered and the Wimbledon Park Masterplan (Document LBM10) has informed Merton's Local Plan including policy N8.1
624	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>6 The 1993 Covenants and the Public Trust</p> <p>6.1 The 1993 Covenants.</p> <p>6.1.1 We explained in previous submissions on this Plan that the former golf course land is bound by restrictive covenants to which the AELTC committed when it acquired the freehold from Merton in 1993, and those covenants prevent development and restrict use. Those covenants were imposed for public benefit and are held by Merton as trustees for the public. Unlike private restrictive covenants (which are generally not material considerations) they are a public right which places a block on development and is a material consideration in the creation of this Plan.19</p> <p>6.1.2 The argument was based on the Holocaust Memorial case and discussed at the Inspectors' Hearings in 2022 when Merton and the AELTC tried to argue that the 1993 covenants were irrelevant or could be set aside. Since then, the Court of Appeal has refused the Government leave to appeal the first instance decision in the Holocaust Memorial case.20 The Government has announced that it would be pursuing primary legislation, a clear admission that the restriction on development of the land in question was a material consideration.21</p> <p>6.1.3 Immediately after their planning committee passed that application, the leader of Merton Council wrote to AELTC to remind them of the 1993 covenants and ask how they will be satisfied. We gather that no substantive answer was received.22</p> <p>6.1.4 In view of these more recent developments, we maintain our legal position that the 1993 covenants are material considerations in the deliverability of the Plan relating to Wimbledon Park. There are two reasons: the AELTC golf course land is bound by the 1993 covenants, and the benefit of the covenants is vested in Merton as trustee for the public of the park and lake.</p>	No change proposed. This matter as it relates to the Local Plan was discussed extensively at the hearings in 2022 and is set out in relevant hearing statements.
625	120		Wimbledon Park Residents Association	08 Wimbledon Park	N8.1 Wimbledon Park		MM112	<p>6.2 The Public Trust of Wimbledon Park</p> <p>6.2.1 The public trust under which the Park is held has a significant bearing on the ownerships of both Merton and the AELTC and the Plan would be incomplete without an acknowledgement of that fact. Since the Inspectors' Hearings closed, the unanimous Supreme Court decision in Day v Shropshire (2023) has clarified the law about local authority powers over public trust land.</p> <p>6.2.2 The Wimbledon Park Estate was acquired by the Wimbledon Corporation in 1915 and on local government reorganisation in 1965 transferred to Merton by Article 16(2) and Schedule 4 of the London Authorities (Property etc.) Order 1964. Once transferred to Merton, it was specifically "appropriated" by Article 44 and Schedule 5 Part II of the London Government Order 1965 to be held under section 164 of the Public Health Act 1875. This applied the statutory trust, meaning that Merton have held and continue to hold Wimbledon Park on trust.</p> <p>6.2.3 The Wimbledon Park Estate had been held by the Wimbledon Corporation as a "local and public advantage" for the people within its area, the people of Wimbledon.23 There is no evidence that the beneficiaries of the statutory trust were to be any different after 1965: it must be inferred that the trust continued for the benefit of the people of Wimbledon.</p> <p>6.2.4 This is a technical topic, and if the Inspectors require, we should be happy to advance further legal arguments in support of it. Merton and the AELTC are aware of the arguments which have been discussed in submissions from this Association, the Wimbledon Society and the AELTC in relation to planning application 21/P2900, including Opinions of various Leading Counsel.</p> <p>6.2.5 The effect of this public trust issue is twofold. First, and this is not disputed by Merton or the AELTC, Merton hold the park and lake on trust for the public. Their powers to deal with land are severely limited by the Local Government Act 1972 as amended. This should be acknowledged if N8.1 is to remain. Day v Shropshire established that failure to comply with such legislation is a material consideration in the planning process relating to the land. Since the LGA 1972 provides very few powers to the local authority as statutory trustee, the limit of those powers is material. The trustee duties include the enforcement of the 1993 covenants.</p> <p>6.2.6 The second point is that Merton sold the freehold of the golf course in 1993 to the AELTC ignorant of the statutory trust basis on which they held it. That, also, has not been disputed by Merton or the AELTC. Day v Shropshire further established that failure to comply with the statutory requirements on such a sale means that the buyer takes and holds the land on the public trust. This aspect is in legal dispute with Merton and the AELTC and may well be pursued in litigation if it cannot be resolved.</p>	No change proposed. This matter as it relates to the Local Plan was discussed extensively at the hearings in 2022 and is set out in relevant hearing statements.