

From:
To: [Future Merton](#)
Subject: Merton Centre for Independent Living's response to consultation on main modifications to draft Local Plan
Date: 21 March 2024 17:17:32
Attachments: [Outlook-du0v3kem.png](#)
[Outlook-qq5yl3p0.png](#)
[Merton CIL's response to consultation on main modifications to draft Local Plan 21-3-24.pdf](#)

Dear Future Merton,

Please see the attachment.

I would be grateful if you could confirm receipt of this email.

Thank you.

Kind regards,

Policy and Campaigns Manager



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Registered charity number 1152825. Registered company number 7645926



Merton Centre for Independent Living
 Vestry Hall
 336 London Road
 Mitcham
 CR4 3UD

21-3-24

Dear Future Merton,

Consultation on Main Modifications to Merton's Draft Local Plan

I submit on behalf of Merton Centre for Independent Living, a local Deaf and Disabled People's Organisation, our response to the consultation on the main modifications to Merton's draft Local Plan.

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.

Chapter 11 – Housing Provision – Main Modification 151

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.’

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.

Chapter 12 – Places and Spaces – Main Modification 197

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.’

¹ p.132 https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

² p.133 https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Chapter 16 – Sustainable Travel – Main Modification 340

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.

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'.

Additional Observation

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.

Please do not hesitate to contact me if you have any questions. My
email address is _____ and my phone number is _____

Yours sincerely,

Policy and Campaigns Manager