

**From:**  
**To:** [Future Merton](#)  
**Cc:** [Councillor Matthew Willis](#); [Councillor Anthony Fairclough](#)  
**Subject:** Liberal Democrat Local Plan Consultation Response  
**Date:** 22 March 2024 20:08:04  
**Attachments:** [Lib Dem LocalPlanMarch24Response.pdf](#)  
[Outlook-byiscntj.png](#)

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Good evening,

Please find attached the Liberal Democrat Group's response to this consultation stage of the New Local Plan.

I'd be very grateful if you could confirm receipt.

Thank you,

Josh

Josh Price  
Policy and Research Officer  
Liberal Democrat Group



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## New Local Plan

### Consultation response from London Borough of Merton Opposition Group - Liberal Democrats

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](#).

#### 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.

#### 01b Good Growth Strategy

**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.

### **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.

### **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.

## **01c Urban Development vision and objectives**

### **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.

## **02 Climate change**

### **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.

### **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.

### 03 Colliers Wood

#### 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.

### 04 Mitcham

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.

### 05 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.

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.

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.

## 06 Raynes Park

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.

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.

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 1*.

## 07 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

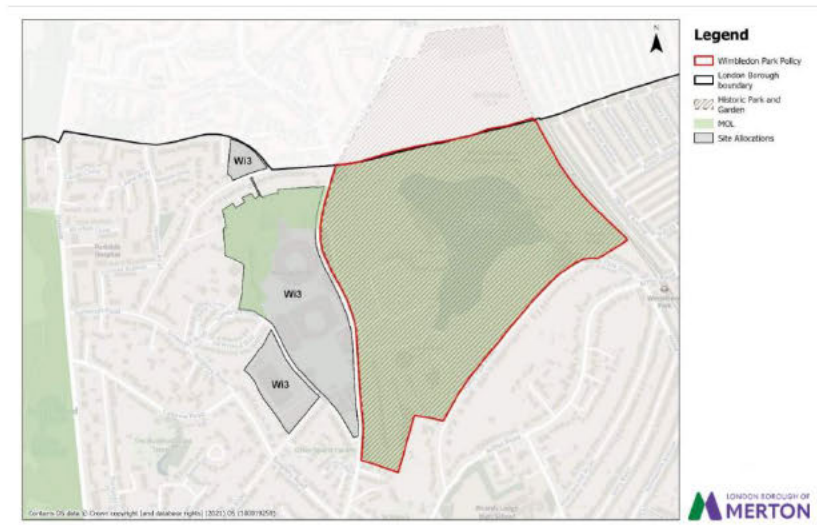


policy on Merton's estates, we hope to see resources put into the whole ward without limiting this to High Path. This would prevent any areas in between from being left behind.

## 08 Wimbledon Park

We welcome the removal of the old golf course site from the **Wi3** 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.

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:



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.'

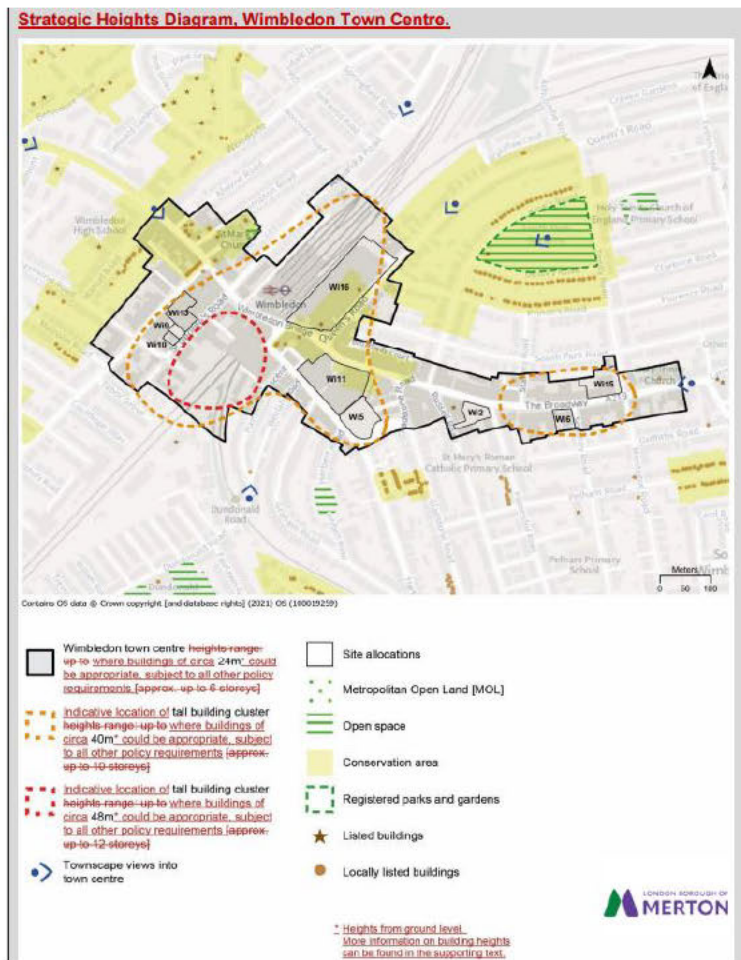
This line seems to reference proposals from existing planning applications that frame the trees being removed as a positive thing, for example to remove previously marked fairways - It is our position that this will facilitate overdevelopment of the site and many residents will not support this.

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 **Wi3** 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.

## 09 Wimbledon

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:





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 **W19**, **W10** and **W13**. 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.'

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.

### **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.

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.'

We support the update to the Wandle Trail paragraph (**15.6.10**) within the **Green & 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 **Wi16** (Wimbledon Quarter).

## 10 Health and Wellbeing

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.

### 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.

### 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.

### **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.

### 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.

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.

## **11 Housing**

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.

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.

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.

### **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.

### **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.

### **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.’

## 12 Places and Space

### **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.

#### **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.’

#### **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.

#### **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.

### **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.

## 13 Economy

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.

### **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.

## **14 Infrastructure**

### **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.

#### **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.

## **15 Green and Blue Infrastructure**

### **15.6.10**

The 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.

### **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.

#### **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.

### **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.

#### **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.

#### **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.

#### **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.

#### **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.'

### **16 Sustainable Travel**

#### **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.

### **17 Monitoring**

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 D12.6 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.