

**From:**  
**To:** [Future Merton](#)  
**Subject:** Local Plan Consultation and Modifications  
**Date:** 21 March 2024 13:29:02  
**Attachments:** [MPWRA Letter re Local Plan Consultation and Modifications.pdf](#)  
[MPWRA Schedule re Local Plan Consultation on Modifications.pdf](#)

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From:

Dear Future Merton Team

Please find attached a letter and schedule regarding our findings.

Yours faithfully

Chairman MPWRA

## MERTON PARK WARD RESIDENTS ASSOCIATION

21<sup>st</sup> March 2024

Future Merton Team  
London Borough of Merton.  
Civic Centre,  
Morden, Surrey  
SM4 5DX

Dear Future Merton Team

### **Local Plan Consultation on Modifications**

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.

Yours faithfully,

Chairman of MPWRA

Comments on Major Modifications within Merton Local Plan by Merton Park Ward Residents Association

Comment Number	Chapter & Page Ref	Item Ref	Text	Comment
1	01b Page 10	1.2.3	Creating liveable attractive and safe places for people to live, study, work and visit.....	<i>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.</i>
2	01b Page 17	1.2.43	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.	<i>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.</i>
3	01c Page 33	4 b	all development is supported by necessary infrastructure...benefits for local and surrounding communities	<i>see later observations</i>
4	01c Page 35		improved community health and wellbeing	<i>see observations under Comment number 21</i>
5	5 Page 178		Improving public space - prioritise pedestrians and cyclists....	<i>see later observations</i>
6	5 Page 183	e	located appropriately and relate well to surrounding context	<i>see observations under Comment numbers 2,12,15</i>
7	5 Page 184	5.1.1-5.1.3	this deleted section should be reinstated	<i>so that its context is better understood in relation to future planning.</i>
8	5 Page 185	5.1.4	opportunity to create new character areas and features....	<i>but this must be respectful of its very close proximity to the adjacent low rise residential housing.</i>
9	5 Page 186	5.1.14	optimising intensification	<i>it is perhaps a more palatable description but nevertheless it is actually intensification by another name - see later comments.</i>
10	5 Page 187	5.1.17	...appropriate protection against decline..	<i>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.</i>
11	5 Page 194	5.1.49	The surrounding Morden neighbourhood	<i>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.</i>

12	5 Page 195 - 196	5.1.56 - 5.1.64	Delivering the Morden Regeneration Zone (Site Mo1)	<p><i>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.</i></p> <p><i>The intensification of Morden town centre at the proposed level of high density <b>conflicts</b> 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.</i></p>
13	5 Page 196	5.1.63	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	<p><i>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.</i></p>
14	5 Page 207	Mo 1	Map	<p><i>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.</i></p>

15	5 Page 208	1 c	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.	<i>Relocation as a bus <u>stand</u> 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.</i>
16	5 Page 210	Site Location	Strategic Height Design	<i>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.</i>
17	5 Page 213	Morden Road Clinic	Infrastructure requirements	<i>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.</i>
18	11 Page 363	H11.1 (d)	Provide step-free accessible and adapted housing in accordance with London Plan Policy D7	<i>See also observations under Item 10 We agree there is a need for adapted housing in close proximity to the town centre.</i>
19	11 Page 370	11.1.18	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.	<i>There should be no dilution of other policy requirements as a sop to developers seeking mitigation of their obligations under design or planning criteria.</i>
20	11 Page 375	11.1.38	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.	<i>The phrase “..wherever possible” should be deleted to prevent net loss of essential affordable housing.</i>
21	11 Page 390	11.4 a vii	The quality of accommodation complies with all relevant standards for that use.	<i>This strikethrough should be reinstated</i>

22	12 Page 408	12.1.3	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.	<i>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.</i>
23	12 Page 418	12.3.f	Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens	<i>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.</i>
24	12 Page 429	D12.4 b, e, f, h, j	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.	<i>All the deletions should be reinstated to ensure harmony in context and scale within neighbouring settings.</i>
25	12 Page 438	D12.6	They accord to the most up to date and relevant national guidance and London Plan and council policies, guidance and relevant site allocations.	<i>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.</i>

26	12 Page 441	Strategic Heights Diag	Strategic Heights Diagram	<p><i>The introduction of an arbitrary indicative outline where tall buildings of up to 71m 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.</i></p>
	Chairman MPWRA			21st March 2024