
Dear Future Merton

Thankyou for the opportunity of commenting on the Small Sites Toolkit Consultation Draft SPD.

Please find attached comments on behalf of the Battles Area Residents Association Committee.

Kind regards

BARA Commitee Member



BATTLES AREA RESIDENTS ASSOCIATION



Response to Character Small Sites Toolkit SPD Consultation Draft SPD by Battles Area Residents Association (BARA)

Thank you for the opportunity of commenting on the Merton Small Sites Toolkit Draft SPD. We welcome the preparation of the document as a way of raising the quality of new development in the Borough and ensuring its design and appearance takes full account of context and local character. We have raised concerns about the poor quality of recent developments and the failure of applicants to consider local character and the views of residents and we see this as a positive step forward in creating better places.

We set out below our comments on the relevant sections of the document. To a large extent these reflect the comments recently made by BARA on the draft Local Plan and highlight again the importance of ensuring that new development protects and enhances local character, strengthens local communities and meets the needs of existing and future residents.

2 How to use the Toolkit

Section 2.2 The Planning Process- We would like to see greater encouragement for pre-application consultation with the local community. We believe early consultation can make a positive contribution to design development. In our experience, it is often too late for changes to be made after the submission of a planning application. This is in line with the Building Better, Building Beautiful Commission's final report and the Planning White Paper which places importance on the role of communities in shaping the places they live.

3 Site Conditions

Section 3.0 Site Character- We have separately commented on the Merton Character Study and raised concerns that the character area definition does not fully reflect the opportunities within South Wimbledon by the adoption of a blanket approach. We do however agree that a full understanding of the character of the site and its context is an essential starting point in the planning process.

Section 3.1 Existing buildings- Our experience of conversions of existing buildings has highlighted a number of problems which need to be addressed early in the design process

including parking pressures, servicing and delivery, waste storage and amenity space. These should be referenced in the document.

Section 3.2 Backland sites- Backland sites often provide parking or servicing areas for existing properties. It will be important to ensure that the development of backland sites makes adequate provision for the replacement of existing functions and does not lead to increased pressure for on street parking and servicing and inadequate waste storage/collection facilities. It will also be necessary to consider the impact on residential amenity and loss of green space.

Section 3.7 Undevelopable sites- We welcome the proposals for the use of difficult sites as public spaces and the use of the neighbourhood Fund to improve our neighbourhoods and look forward to working with the Council to realise this objective.

Section 3.9 Assembling sites- We believe that avoiding over-development of small sites and improving the local neighbourhood should be applied to all development.

4 Good Design Principles

We generally welcome and support the good design principles but would suggest the following additions:

Made in Merton

- Respond to local character and needs set out in Merton's Borough Character Study and *respect and enhance heritage assets*

Fit for purpose

- Provide rooms *and outside spaces* that are functional, adequately sized and adaptable
- *Make provision for on-site waste storage and recycling*

Putting people first

- *Ensure provision of necessary infrastructure to meet the needs of the development*
- *Consult at an early stage with the local community*

Economical and sustainable

- *Consider the reuse of existing buildings*

5 Made in Merton

We support the principle that proposals must demonstrate how the character of the surrounding area has been taken into account. However, we would expect a developer to undertake independent analysis of local character rather than to rely solely on the Borough

Character Study. This should include consultation with the local community to understand the existing conditions, needs and aspirations of the neighbourhood. We would therefore suggest the following amendment to objective 2:

*Respond to local character and needs set out in Merton's Borough Character Study **and identified through an assessment of local context and consultation with the local community***

Para 5.1.5- The heritage value of sites also relates to its historical association and we would wish this to be taken into account in the design approach adopted.

Para 5.1.7- We believe it is important to consider the potential for the renewal of a heritage asset as a whole rather than just façade retention.

Para 5.1.10- We welcome the guidance on massing and scale and the need to ensure this is informed by its immediate context. In the case of tall buildings, it is also important to consider longer distant views as well as street level views as this can impact on the character of an area.

Paras 5.1.27-5.1.33- The storage of bins is absolutely critical to the successful integration of new development within an existing neighbourhood. We welcome the requirement for refuse facilities to be included at the start of the design process but it would be helpful if further design guidance could be included in this document.

Paras 5.1.34-5.1.39- The impact of car free developments must be carefully considered in relation to local parking pressures. The paving of front gardens should not be permitted in new developments and a landscape-led approach should be *required* not merely encouraged.

6 Fit for Purpose

The guidance in this section is generally welcomed. The provision of adequate on-site external space is considered essential in promoting good quality living conditions.

7 Putting People First

The guidance in this section is generally welcomed, particularly in respect of the need to consider health impacts and impact of the massing of new development on neighbouring properties and ideas on how to meet community needs. We would however welcome reference to community engagement in the design process.

8 Economical and Sustainable

The guidance in this section is generally welcomed. As previously noted, there is no reference to consideration of the retention and repurposing of existing buildings as an

alternative to redevelopment. There should be a greater focus on the move towards zero carbon in the design of new development.

9 What is it?

Whilst it is acknowledged that all sites will have their own unique character which will require a different design approach, the case studies are helpful in showing how development can respond positively to site conditions and local character.

10 Design and Access Statements

Design and Access Statements are very helpful to the community in understanding the design principles underpinning development proposals and we consider these documents to form an essential part of any planning application.

Summary

We welcome the preparation of the Small Sites Toolkit SPD and believe it will help to raise the quality of development in the Borough. We would however like to see a greater emphasis placed in the document on early engagement with the local community.

We look forward to the toolkit being implemented and to working with the Council, developers and other stakeholders in ensuring future development is of the highest quality and protects and enhances local character, strengthens local communities and meets the needs of existing and future residents.

Chair, Battles Area Residents Association (BARA)

March 2021