
Dear Sirs

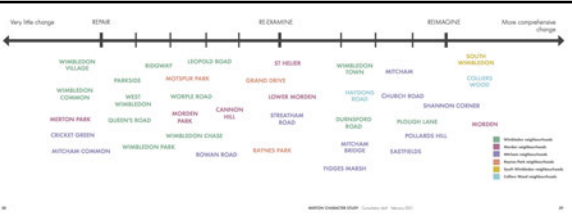
Attached is my response to the above study.

Kind regards

Respondent Ref:	Character Study	Observations
1	From:	<p><i>I make this response to Merton's Character Study in the following capacities:-</i></p> <p><i>A) Resident of Merton Park for 65 years and resident of Sandbourne Avenue for 46 years</i></p> <p><i>B) As an owner also of a commercial property in Crown Lane Morden</i></p> <p><i>C) As a retired general practice chartered surveyor (FRICS) who has practised in Merton for 40 years and has widespread knowledge of the built environment in the locality</i></p> <p><i>D) As a member of local community and faith organisations</i></p>
2	<p>Merton's Equality and Community Cohesion Strategy. Extracts: "At the decision-making stage councils are required to assess how changes to policies and service delivery will affect different people. Therefore the Act requires that we provide accessible services to all our customers. " ".....supporting those who do not usually get involved in decision-making to better understand how they can get involved and get their voices heard."</p> <p>"Ensure regeneration plans increase the opportunity for all Merton's residents to fulfil their educational, health and economic potential, participate in the renewal of the borough and create a health promoting environment."</p>	<p><i>The circulation of this Character Study in digital format appears to conflict with Merton's Equality and Community Cohesion Strategy in that this 179+ page document is far from readily accessible.</i></p> <p><i>I have spoken with neighbours who have told me that they have attempted to read the study but have "given up" due to its user-unfriendly format. It may well be beautifully laid out, and easy to read in hard copy glossy format, but in its present form it is virtually impossible to interpret - especially for the lay respondent. Many sections require magnification by several hundred percent. It is impossible to read a "double page spread" as a single entity, thereby making informed understanding or comparison impossible.</i></p> <p><i>For the above reasons, the publication of this study in digital format fails Merton's own strategy and criteria, ie. to support those who do not usually get involved in decision making and to enable them to get their voices heard. Many of their voices will not be heard because they, like me, have simply "given up".</i></p> <p><i>For the same above reasons, the opportunity to participate has been, at best frustrated, and at worst denied, to the very residents it is seeking to involve.</i></p>
3	<p>A1 This analysis helps to provide an understanding of the particular attributes which make the borough of Merton what it is today, and draws out the identity of each neighbourhood within the borough.</p>	<p><i>Merton Park street scenes, outside the Conservation Areas, contain a variety of established, mellow, building styles, the nature and scale of which should be acknowledged and reflected in any new developments.</i></p>

4	<p>A1understanding character is important as it illustrates the distinctiveness across the borough and how these local qualities should inform future approaches to managing growth and change.</p>	<p><i>The inherent qualities that combine to characterise the different areas, especially residential, have taken years to evolve. They invariably result from commitment to, and involvement in, those areas by successive generations of occupiers. These things take considerable time to establish, community input to maintain, but can so readily be undermined by policy planners seeking to meet (short term?) planning objectives. It is vital therefore that the borough fully understands the distinctiveness of the respective areas - in this case, the distinctiveness of Merton Park. Regrettably, this does not appear to be the case in the current study.</i></p>
5	<p>A1 It is therefore critical that future development is informed by a detailed understanding of the borough's character, and an appreciation of its qualities and places so that growth can be tailored to individual neighbourhoods .</p>	<p><i>With specific reference to the Merton Park area it does not appear that the authors of the study have at all appreciated or understood the inherent characteristics of Merton Park, and especially its south easterly sector where it starts to border with Morden. It may well be in closer proximity to Morden town centre than, say the Conservation Area, but its identity is Merton Park.</i></p>
6	<p>A1 It will support preparation of the Council's new Local Plan as a Supplementary Planning Document (SPD) and be used to inform a character and 'place-based' approach to managing growth in the borough.</p>	<p><i>The Study claims it has SPD status because it does not introduce any new policies. This appears incorrect as it puts whole sectors of established residential areas into the Opportunity category. This is in fact a new policy, should not qualify as a SPD and should therefore be subject to scrutiny at any Public Inquiry.</i></p>
7	<p>A1objective of the study is for Merton to play its part in solving the nationwide housing crisis.</p>	<p><i>This is the over-arching objective of the entire study. Inevitably, "intensification" is the name of the game, with consequences of increased density, infill developments, etc It is essential that full regard is paid to ensure that any infill development is in keeping with its surroundings and has minimal adverse impact on the immediate neighbourhood and is subject to full scrutiny through the planning processes.</i></p>
8	<p>A1The study's aim is to define an approach to growth for different parts of the borough, informed by an analysis of character. Where areas have a strong existing character this will be reinforced and protected. In other areas there may be opportunities to re-examine what is there with opportunities for improvement. In areas with less existing positive character there may be opportunities to reimagine these areas into new place</p>	<p><i>"Where areas have a <u>strong existing character</u> this will be <u>reinforced and protected</u>. In other areas there may be opportunities to <u>re-examine</u> what is there with <u>opportunities for improvement</u>. In areas with <u>less existing positive character</u> there may be opportunities to <u>reimagine</u> these areas into new place" How are these criteria and classifications established? Sounds potentially subjective. Determined by response of residents? As a resident of Sandbourne Avenue for 45+ years I can testify that Sandbourne has a "strong existing character" - eg. 70+ households on the "Sandbourners" WhatsApp site. Whether this character can be established by cursory examination, desktop study or external "profiling" seems to be a point of weakness.</i></p>

9	<p>The study of character is a means to engage with the story of a place. It allows us to connect with the humanity of each place and understand how people's lives, thoughts and actions have left their imprint. Making sense of Merton's complex evolution allows designers and planners to make more informed decisions about how the borough's neighbourhoods ought to grow in the future Environmental character and climate change</p>	<p><i>Any response here is linked with above observations. How do we ensure planners decisions and policy making will reflect the inherent individual characteristics of a place that have taken years to evolve and establish, which to the casual observer are not readily apparent?</i></p>
10	<p>B1 The past century of urbanisation has resulted in incremental losses of local vegetation and the sealing over of natural ground surfaces, which has made urban areas of Merton more vulnerable to the urban heat island effect and to floods at times of high rainfall. Interventions to help mitigate these impacts should include increased tree planting to create shade, reduction in sealed surfaces which can "bounce" radiated heat back into the urban environment and delivery of new green spaces which remain cooler than surrounding urban areas.</p>	<p><i>The loss of front gardens through conversion to vehicular hardstanding is an element that need addressing urgently - perhaps by the levy of a surcharge on top of the cost of a crossover plus an annual addition to Council Tax similar to the Wimbledon Commons 'tax'.</i></p> <p><i>The core objective of "intensification" and development of back land or over rear gardens is at odds with the claimed focus on environmental welfare. Development should be focused on brownfield sites or those where development can be undertaken without increasing the plot footprint.</i></p>
11	<p>C1 of the 36 neighbourhood areas in C1Merton Park has been placed in a sub group of six sub areas viz Morden, Cannon Hill, Morden Park, St Helier and Lower Morden.</p>	<p><i>It is accepted that there has to be some arbitrary "grouping" but the character of Merton Park is more closely aligned to Wimbledon than Morden.</i></p>
12	<p>C1 The nature of how intensification and interventions should differ across the borough in response to character has also been considered, providing an indication of where key areas of growth sit on the spectrum of repair - re-examine - reimagine. The diagram below illustrates at a diagrammatic level how the nature of intensification should vary across key areas of the borough.</p>	<p><i>See below</i></p>

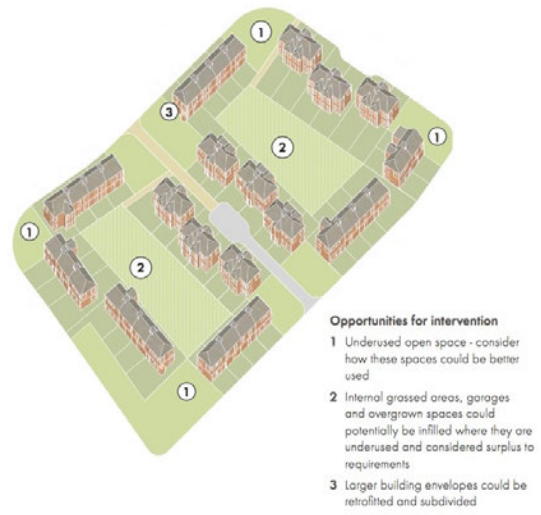
<p>13</p>		<p>Potentially misleading, in that “Merton Park” is shown at the “repair/very little change” end of the spectrum, whereas a not insubstantial block of Merton Park is at the other extremity of the spectrum (Sandbourne, Daybrook, Windermere, parts of Dorset Road etc) entitled “more comprehensive change” - where it is inaccurately described as “Morden”. See later observations re recommended change of western boundary of this green area.</p>
<p>14</p>	<p>C1 A greater intensity of growth is appropriate in some locations, while the strategy should be focused on re-use and infill in other parts of the borough. More comprehensive reimagining would be appropriate in some areas - such as alongside significant infrastructure investment, estate regeneration or where large big box retail sites present opportunities for more fundamental intervention - where through redevelopment it will be possible to create better continuity with the surrounding neighbourhood.</p> <p>In the borough's key centres, the emphasis should be on re-examining character.</p> <p>Although many of these places are attractive historic centres, some more fundamental interventions could help to repair the existing character through the redevelopment of available sites along and behind the high streets or adjacent to railways to help intensify the most sustainable locations.</p> <p>For other neighbourhoods, the emphasis should be on repairing and protecting the existing fabric and condition, enhancing the existing character through sensitive infill and re-use of existing building fabric. Throughout the borough, in residential areas, there will be opportunities for sensitive infill development that helps to raise the quality of neighbourhoods and complement the existing character.</p>	<p>Development expansion of this magnitude will bring intense pressures on health, education, social welfare and transport provision, It is essential that new provision is planned and fulfilled at the commencement of any large scheme and not simply “deposited” via CIL.</p>

15	<p>I1 Today, the area is an attractive suburban location for Londoners. The areas has a consistency in scale with dominance of inter-war and 1940/50s development.</p> <p>key issues / opportunities Transition between densifying town centre and suburban residential could be improved, currently quite abrupt</p>	<p><i>There is nothing adverse about the abruptness of transition as this demonstrates a clear demarkation between areas of commercial activity and those which are residential.</i></p>
16	<p>Map shows area orangey yellow = Sandbourne/Daybrook area shown as “Re-examine”</p> <p>Recognise Morden South station as a key future node</p> <p>The area around Morden South station has seen the growth of some key uses, most notably the mosque. The presence of key community assets such as the mosque and Morden Park, and the accessibility of this node afforded by the station and A24 route, make it a strong location for intensification which would benefit the nearby suburban residential areas</p>	<p><i>See earlier and later observations.</i></p> <p><i>Please demonstrate in what way is it proposed that this would benefit surrounding residential areas.</i></p>
17	<p>Context-led growth The aim of this character study is to ensure that the growth that happens in the borough over the next decades is informed by a good understanding of existing (and past) context. It is really important that the next stage of evolution learns the lessons from past development in the borough - the successes and the failures.</p>	<p><i>It is essential therefore that this consultation period is not rushed and it is therefore especially regrettable that even during a period of pandemic-related constrictions an extension in response time has been denied.</i></p>

J Internal grassed areas, garages and overgrown spaces could potentially be in filled where they are underused and considered surplus to requirements

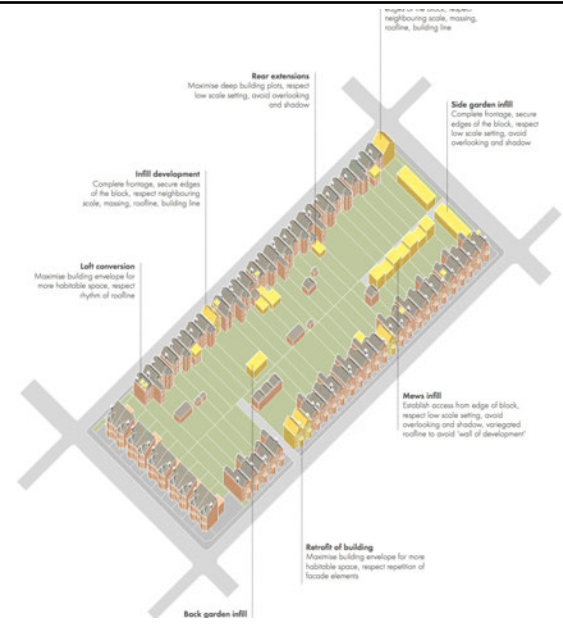
I have just picked on this one example...there are others. There is a distinct and vital difference between “use” of an area and its inherent “value”. Value, not in monetary terms but beneficial value in terms of environment, mental health, physical and social wellbeing, and bio diversity.

18



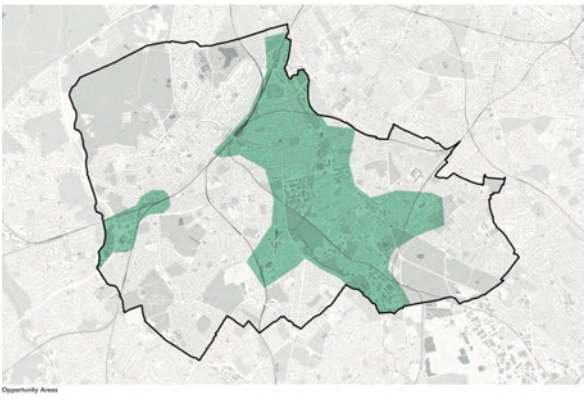
A primary focus as regards the nation’s welfare during this pandemic is mental wellbeing. Mental health is enhanced through connection with the natural environment - regardless of whether this is represented in a small patch of land or a larger area. Just because an area of land is unused, under-used, or overgrown (especially in a communal setting as shown on the plan) does not mean that it is right to destroy and develop it. The adverse impact arising from progressing such a policy would be wholly counter productive, would have detrimental impact on the wellbeing of surrounding property occupiers (and others) and those currently benefiting (whether actively or passively) from an area of open space, increased vision of the skyline or observation of the natural environment.

19



There are numerous return frontage sites like this in Merton Park. The implementation of schemes of this type would destroy the very character and “distinctiveness” of Merton Park, which is characterised by well proportioned on houses on well proportioned plots, with these return frontages providing the special “open” feel to the area, that is a special and valuable feature of Merton Park.

In this consultation you have sought to establish the individual characteristics of an area. The “open feel” is one such special characteristic of the whole of Merton Park, and not only the Conservation Area. It is the very infilling and “enclosing” of return frontages and back land that would destroy the core special characteristic of Merton Park. It is this characteristic that I believe the study’s authors have failed to grasp.

20		<p><i>The merging and allocation of the southern part of this green shaded area of Merton Park into Morden is at odds with the stated aim of “understanding the character and distinctiveness of areas across the borough”</i></p> <p><i>The western edge of this green area should be re-drawn to follow Morden Road and London Road., ie Sandbourne, Daybrook, Dorset, Windermere, Grasmere and other roads in this patch should be excluded.</i></p>
21	<p>Opportunity or Intensification Area Opportunity Areas are identified as significant regional locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Taking maximum advantage of these sites being unlocked means delivering significant volumes of high quality, high density development including strategic housing growth. Merton Opportunity Area and the South Wimbledon/ Colliers Wood intensification area are considered more suitable for tall buildings.</p>	<p><i>The allocation of “tall buildings” to this green shaded area of Merton Park is also at odds with the distinctive character of Merton Park which is characterised by low rise housing.</i></p>
22	<p>K Masterplans for key areas of change: In locations where character will be evolving through intensification, masterplanning will form an important step to refining the direction of change and the appropriate grain and massing. Both Colliers Wood and Morden will need to be steered by overarching masterplans to help make the very best of the next phase of change and ensure the transition between surrounding neighbourhoods and the denser centres is comfortable.</p>	<p><i>“.....transition is comfortable” Comfortable for whom? There needs to be an assurance that development in Morden Town Centre will scale back in density, profile and massing as it merges with the existing residential areas.</i></p>

• What are Merton Park's boundaries?



- Some think Kingston Road is the northern boundary, others think Merton Park extends beyond Kingston Road into Wimbledon Chase area.
- General agreement that the tram line forms the eastern edge, although acknowledge Old Merton Park on other side of tramline.
- Some think the Merton Park area should be in Wimbledon, not Morden.
- Some people think it's its own piece - different to Wimbledon and Morden
- Merton Park is more compact? Defined by the arts and crafts houses and gardens of the John Innes developments / the John Innes Estate and the Church / original Garden Suburb and conservation area / parish boundaries of St. Mary's Church?

Existing boundaries for Merton Park

Residents who disagree with the boundary and described their neighbourhood as Merton Park

Merton Park's boundaries are defined by railway and tram lines, then within that area by age and type of housing. Morden is the major shopping centre on the southern perimeter

I agree with the boundaries as titled in the pan marked "Most popular".

23

Possible moves...

Most popular



Proposed change:
Move boundary northwards to Kingston Road (but include the Kingston Road frontage within Wimbledon Chase)

24

General

For reasons as outlined earlier, my observations on its wider implications and other areas (eg Morden) noted in the study, cannot be made as I lost the will to live after numerous attempts at trying to read and interpret the study in this user-unfriendly digital format. For a significant consultation of this importance to be marred by such inaccessibility and unreasonable response-time limits, is not only regrettable but disappointing.

22 March 2021

END