# Committee: Borough Plan Advisory Committee

# Date: 20 September 2012

Agenda item: 4

Wards: all

## Subject: Sites and Policies DPD – progress and proposed timetable amendment

Lead officer: Director for Environment and Regeneration, Chris Lee

Lead member: Cabinet Member for Environmental Sustainability and Regeneration, Councillor Andrew Judge

Forward Plan reference number: 1199

Contact officer: Future Merton Strategic Policy Manager, Tara Butler

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**Recommendations:**

That Members consider the report and recommend to Cabinet:

A. That the sites set out below paragraph 2.8 of this report are not taken forward for allocation in the final DPD

B. That the timetable for producing the Sites and Policies DPD is adjusted by three months (change to the Local Development Scheme.)

C. That the decision on public consultation Site 82 Woodman Works be delegated to the Director for Environment and Regeneration in consultation with the Cabinet Member for Environmental Sustainability and Regeneration for public consultation, subject to the views of Crossrail 2.

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## 1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

1.1. Once adopted in 2013, Merton's Sites and Policies Development Plan Document (DPD) will replace the remainder of the Unitary Development Plan 2003. It will provide detailed planning policies and allocate sites for new development. Merton's Proposals Map DPD is being revised at the same time, which will designate land for specific uses.

1.2. This report is to update Members on the progress of the plan, recommend that some sites be removed from the plan and to recommend that the timetable for producing the DPD be lengthened by three months.

1.3. The report also recommends delegating the decision to publicly consult on Site 82 Woodman Works to the Director of Environment and Regeneration in consultation with the Cabinet Member. Site 82 is safeguarded under the Crossrail Act as potentially being needed to support Crossrail 2 and development assessment is waiting for a response from Crossrail 2 before proceeding.

## 2 DETAILS

2.1. Merton's Sites and Policies DPD was started in July 2011 and since then has been through three stages of public consultation over a total of more than eight months:

2.2. July-September 2011 – ***Stage 1 Call for sites*** to encourage respondents to submit sites for potential redevelopment, issues to be considered for new detailed planning policies and potential land designations on the Proposals Map

2.3. January-May 2012 – ***Stage 2 Preferred options*** for approximately 20 detailed planning policies, approximately 50 potential sites and Proposals Map changes

2.4. June-July 2012 – ***Stage 2a Preferred options continued*** for an additional 15 sites suggested at Stage 2, three detailed planning policies and some Proposals Map amendments.

2.5. The next stage will be the final draft of the plan, which will be submitted to the Secretary of State and be examined in a public hearing by an independent planning inspector.

**Progress on potential development sites**

2.6. For a potential site to successfully remain in the final plan, it must be proved to be deliverable. In other words, the site must be:

- suitable: for example, the site must have no insurmountable physical restrictions, national policy conflicts or issues arising from consultation that make the site unsuitable for its proposed redevelopment
- available: within the 10 years of the plan, there must be some reasonable likelihood of the site being available for development (e.g. no extensive leases, restrictive covenants, unwilling landowners etc)
- achievable: there must be some evidence that the cost of redeveloping the site for its proposed use is not so excessive that no-one would ever redevelop it

2.7. This approach is different from that in place for preparing Merton's Unitary Development Plan 2003, where there was no requirement for sites to be deliverable.

2.8. From the research and public consultation so far, officers recommend that the following sites not to be allocated in the DPD for the reasons set out in the table below.

| Site number, name, ward | Reason for recommending not to allocate the site in the DPD |
|---|---|
| Site 04 Bond Road Day Centre, Lavender Fields | The site is currently in use as a day centre and there are no current proposals to reprovide the services elsewhere within the next 10 years. |
| Site 06 Durnsford Road corner, Wimbledon Park | The site is already laid out and being managed as a park, and will be designated as open space in Merton's Proposals Map 2013 |

| | |
|---|---|
| Site 07 Gifford House, Ravensbury | The site is currently in use as council offices (shared legal service) and there are no current proposals to provide the services elsewhere within the next 10 years. |
| Site 19. Nelson Hospital | Planning permission approved on 06 September 2012. |
| Site 27. Merton Hall, Abbey ward | This site is currently in use as a community centre and there are no current proposals to provide the services elsewhere within the next 10 years. |
| Site 30. Land adjacent 10 Home Park Road, Wimbledon Park | This site is being managed locally as a small park (known as Kenilworth Green) and it is recommended that this should be designated as open space rather than allocation for development. |
| Site 55. Field B, St Catherine's Square, West Barnes | Site proposed as a Site of Importance for Nature Conservation. Independent ecologists have assessed the site as not meeting these requirements at the present time (The site is still protected as Metropolitan Open Land). |
| Site 72. Wolfson Hospital, Wimbledon Park | A planning application has been submitted and will be decided before the DPD is finished. |

2.9. This leaves 67 potential sites still in the plan, as set out in appendix 1. While it is clear that some of these may be fairly straightforward, others are much more complex and extensive assessment on either their suitability, availability, viability or all three has to be carried out.

2.10. Depending on the results of further research and consultation, more sites may be recommended to Councillors for removal.

**Progress on detailed planning policies**

2.11. We have received a very good response to the public consultation on the detailed planning policies, with many respondents proposing useful amendments, which will help improve the final plan.

2.12. The Coalition Government published the National Planning Policy Framework on 27 March 2012, and associated guidance is still emerging which we have to take account of locally. Government is currently proposing further changes to the planning system, including revisions to the Use Class Order which is likely to allow more changes of use to take place without planning permission.

2.13. On the same date, Government also published new guidance *"Planning policy for traveller sites".* This requires local authorities to set housing targets specifically to meet the local accommodation needs of gypsies, travellers and travelling showpeople, and to identify specific sites to deliver these targets over a rolling 5 year period as well as longer term over 10 and 15 years. These targets must be updated annually and, for the first 5 years, specific sites must be found.

2.14. Merton's Housing Strategy team and Future Merton are working together to identify this need and to explore how it might be delivered.

2.15. The Mayor has also started revising the London Plan 2011; he proposes to publish a new London Plan by 2013. The Mayor is also in the process of producing 11 supplementary planning documents on various issues in the London Plan, all of which Merton's local policies have to consider.

**Progress on land designations for Merton's Proposals Map**

2.16. We are reviewing all of the 40 land designations on Merton's Proposals Map 2003. This includes all open space, sites of importance for nature conservation, industrial areas, transport proposals, town centre boundaries, local shopping parades and others.

2.17. As with sites, land designations must be realistic rather than aspirational. For example for tram improvements there must be a reasonable likelihood (land ownership, finance, Transport for London support etc) of the proposal being delivered within the 10 years of the plan.

2.18. Some of the most extensive and detailed reviews that have been taking place are of town centre and local shopping parades, and of open space. On Merton's Proposals Map 2003, only open spaces over 4hectares are illustrated on the map as anything smaller would have made the paper map impossible to read.

2.19. Merton's new Proposals Map will be available digitally as well as on paper, and therefore each boundary must be accurate for users to be able to zoom in to view individual property boundaries, unlike on the paper map. As part of Merton's mapping project, it will be available online which will make it easier for people to view.

**Proposed change to DPD timetable (Local Development Scheme) – extension by three months**

2.20. While a lot of work has been carried out in the 14 months since the DPD was started, there is still a lot of work to do to ensure that the *Sites and Policies DPD* is finalised to be the most appropriate and robust detailed plan to guide planning applications Merton until 2023.

2.21. Therefore it is recommended that the timetable for the plan be extended by three months to allow enough time to investigate and revise the information to create the final draft of the plan.

**Site 82 – Woodman Works**

2.22. Woodman Works, 204 Durnsford Road, SW19 is a scattered employment site located approximately 100m from Arthur Road local centre. It is bounded on the south side by the rail depot.

2.23. In March 2012, representatives of the owners responded to the Stage 2 consultation, proposing the site for residential use. This has not been subject to public consultation and officers are still considering preferred and alternative options for the site and are awaiting crucial feedback from Crossrail 2.

2.24. The site is protected by the Secretary of State's Safeguarding Direction for the Chelsea-Hackney line (otherwise known as Crossrail 2), which came into

force in June 2008. Officers have contacted the Crossrail 2 team to ascertain the impacts of this site being protected for Crossrail 2.

2.25. It is proposed that any consultation on this site for allocation for any use would only proceed dependent on the response from Crossrail 2. This report recommends delegating decisions on whether or not to consult on preferred allocations to the Director of Environment and Regeneration in consultation with the Cabinet Member for Environmental Sustainability and Regeneration, subject to the response from Crossrail 2's team and officers' assessment of the site.

## 3 ALTERNATIVE OPTIONS

3.1. Do nothing. This would mean that Cabinet would consider the final draft of the plan at its meeting on 12 November 2012 and full Council on 27 November 2012. However it is unlikely that officers would be able to revise the DPD to a high standard in this short timescale. In particular, many of the sites require ongoing assessment with a variety of other stakeholders (such as landowners, community groups, the Environment Agency, neighbouring boroughs and the Mayor of London). This approach is not recommended, as it would result in a weaker, incomplete final plan, which would not be suitable or robust for Merton and would be unlikely to pass the independent examination.

## 4 CONSULTATION UNDERTAKEN OR PROPOSED

4.1. As set out in the body of the report, specifically paragraphs 2.1 to 2.5.

## 5 TIMETABLE

5.1. The timetable for producing planning policy documents is called the Local Development Scheme and is a statutory document that requires approval by the Mayor of London.

5.2. Merton's Local Development Scheme 2011 was considered by Councillors at the Borough Plan Advisory Committee, Cabinet and full Council until 13 July 2011 and was subsequently approved by the Mayor of London.

5.3. Current and revised timetable for the Sites and Policies DPD and Proposals Map DPD:

| | **Current timetable (Merton's LDS 2011)** | **Proposed new timetable** |
|---|---|---|
| Pre-submission consultation | December 2012 – January 2013 | March-April 2013 |
| Submission to Secretary of State (*exact timetable set by Sec of State from now on)* | March – May 2013 | July - September 2013 |
| Examination and Inspector's report (*exact timetable set by Sec of State)* | June - September 2013 | October-December 2013 |
| Adoption, if pass examination | December 2013 | February 2014 |

## 6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

6.1. Resources for this work can be met from the Future Merton budget.

6.2. In considering the accommodation needs for Gypsies, Travellers and Travelling Showpeople under the new government guidance (see paragraph 2.13 of this report), there may be financial and property implications for the council, depending on the level of need identified.

## 7 LEGAL AND STATUTORY IMPLICATIONS

7.1. The Planning Act 2008 as amended, the Localism Act 2012 and associated Regulations are being adhered to in the production of the DPDs.

## 8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

8.1. An equality impact assessment is carried out and published alongside the DPDs.

## 9 CRIME AND DISORDER IMPLICATIONS

9.1. None for the purposes of this report.

## 10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

10.1. The recommendations in this report to extend the timetable arises from the risk management log for the *Sites and Policies* and *Proposals Map DPDs*.

## 11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix 1: progress on potential development sites (to follow for Cabinet meeting on 24 September)

## 12 BACKGROUND PAPERS

12.1. National Planning Policy Framework (March 2012)

12.2. Planning policy for traveller sites (March 2012)

12.3. Mayor's London Plan 2011 and further amendments (2012)

12.4. Responses to the Sites and Policies DPD and Proposals Map public consultations in July 2011, March 2012 and July 2012.

| Number | Site name, location | What's happened so far? | Next steps |
|---|---|---|---|
| 01 | Hartfield Road car park | Four organisations proposed allocations: retail (Morrisons); community and conference hall (Wimbledon Civitas Group, Wimbledon Society) town centre uses with residential upstairs (Merton Council). Detailed development assessment submitted to BPAC May 2012 and subsequently considered by the council's Integrated Property Team. Development will take place from 2019 due to covenant | Engagement with the four organisations on delivering the site. As site will not be delivered before 2019, by which time there will be market demand, policy and viability changes, propose that designation be broad "town centre uses" with design, parking and other factors as significant considerations. |
| 02 | 43-45 Palestine Grove, Colliers Wood | Small long term vacant workshop proposed for residential. | Delivery expected within first five years. |
| 04 | Bond Road Day nursery | At the present time the site is in use and there are no proposals to provide the services elsewhere. | Recommend removal from the plan. |
| 05 | Colliers Wood Community Centre | Generally supported community / residential allocation at public consultation. | Further work on design and viability will be carried out. Also continue discussions on this site's potential as a future location of Colliers Wood library as lease ends on current site in 2017. |
| 06 | Durnsford Road corner | Site layed out as a small park. | Recommend allocation as open space on Proposals Map |
| 07 | Gifford House | At the present time the site is in use as council offices and there are no current proposals to provide the services elsewhere. | Propose removal from the plan |

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| 08 | Leyton Road Centre | This site is close to All Saints School and all or part of the site may be appropriate for school use sometime over the next 10 years. | Greater exploration of the likely community (education) demand from this site for the medium/long term (with next 10 years). |
| 09 | Mitcham library | V. limited response at consultation. This site is within Mitcham town centre and the principle of the proposed uses (retained library plus residential) would be acceptable via planning permission. It does not need allocation in the DPD to deliver it. | Further exploration of design specifics and viability needed. |
| 10 | Morden Assembly Hall | Strong objections at public consultation. Issues raised include use of building, neighbouring issues and parking. Need further exploration. | Carry out further work on whether or not the site is deliverable for its preferred use: usage assessment, neighbouring impacts, viability etc |
| 12 | Queens Road car park | Site has considerable restrictions: physically, legally and with other potential land designations. | Carry out further work on whether or not the site is deliverable: design, viability, Network Rail (Crossrail 2) views, covenants |
| 13 | Land at Rose Avenue | Day centre demolished 10 years ago. Site vacant. Recently the site has been mown and managed as open space. | Recommend removal from plan |
| 14 | Taylor Road day centre | In use for another 12 months as day centre. Council will need to commit to longer term service needs or potential alternative locations if the site is to be delivered. | Explore long-term council use of the site. |
| 15 | West Barnes library | Support at consultation for the principle of library + community space + residential . Exploring potential of site to be considered alongside neighbouring sites. | Explore detailed design and viability considerations. |

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| 16 | Wimbledon library / Marlborough Hall | This site is within Wimbledon town centre and the principle of the community and other complimentary town centre uses could be acceptable via planning permission. It does not need allocation in the DPD to deliver it. | Explore potential of this site in conjunction with other council services including Wimbledon Community Centre. Explore detailed design and viability considerations. |
| 17 | Worsfold House / Chapel Orchard | Worsfold House is now vacant. Chapel Orchard is being used as part of Cricket Green school. | Explore educational needs for this site alongside other uses. |
| 18 | 60 Pitcairn Road | Supported at consultation. Owner contacted and will deliver site. | Owner supports delivery - likely to be within the first five years |
| 19 | Nelson Hospital | | Remove from the plan – planning permission was approved 06 September 2012. |
| 20 | Wilson Hospital | Wilson is being used for the decant for Nelson Hospital so deliverability for any alternative development will be beyond 5 years. | Sutton and Merton Primary Care Trust will be dissolved by April 2013. Wilson Hospital dependent on other NHS sites including Nelson and Birches for decanting Will be seeking more certainty from PCT on timings and potential uses. |
| 21 | Birches Close | NHS: relationship with Wilson influences the demand for, uses and timing of this site. Potential other community uses could include a school. | Sutton and Merton Primary Care Trust will be dissolved by April 2013. Birches dependent on other NHS sites including Nelson and Wilson hospitals for decanting Will be |

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| | | | seeking more certainty from PCT on timings and potential uses. |
| | Patrick Doody | NHS proposing mixed residential and GP service on site | Will be seeking more certainty from PCT on timing and deliverability. |
| 23 | Amity Grove | Lambton Road Health Centre opening December 2012. Need greater understanding of capacity. Design considerations raised at consultation includes adjoining path. | Will be seeking more certainty from PCT on timing and deliverability. |
| 24 | Morden Road clinic | Proposal will only be taken forward if more residential development in Morden creates demand. Any delivery will be beyond five years. Allocation technically unnecessary as healthcare to healthcare but PCT disbanding and | Explore timings and need in connection with Morden |
| 27 | Merton Hall | | Recommend removal from plan |
| 28 | P4 | Detailed development assessment submitted to BPAC May 2012 and subsequently considered by the council's Integrated Property Team. | Viability work undertaken. Work starting on draft planning brief for consultation in 2013 |
| 30 | Land adjacent 10 Home Park Road | Extensive consultation response and further investigation shows site known, used and managed locally as Kenilworth Green. | Propose designation as open space on Proposals Map |
| 31 | Wimbledon Community Centre | Part owned by council and Wimbledon Community Association. Support for community + offices or residential on upper floors from both parties. | Explore potential of this site in conjunction with other council services including Wimbledon library. Clarify site availability and timing for any potential change. |
| 32 | Wyvern Youth Centre | Closed in September 2012 following needs assessment by Merton Council. | Likely to be delivered within first five years |
| 33 | Elm Nursery car park | Consultation registers interest from neighbouring landowner to north (Dreams Beds). | Explore timings and achievability |
| 34 | Raleigh Gardens car park | Design constrained site. Last built on in 1954. Deliverability only in connection with future of Sibthorp Road car park. | Explore design constraints and deliverability in conjunction with |

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| | | | Sibthorp Road car park. |
| 35 | Mitcham fire station | Historic constrained site. Consultation issues include local desire for community uses though no evidence of deliverability. Landowner (fire service) developing new fire station at Tramway Path. | Exploring deliverability issues. |
| 36 | Chaucer Centre | Council-owned, part leased to other organisations. May be needed for school decant | Exploring deliverability – especially timing. |
| 37 | Wimbledon Greyhound Stadium | Three main proposals: residential led mixed use (Greyhound Racing Association); greyhound stadium + supermarket (Hume Consulting); football stadium + associated residential, education and retail (AFC Wimbledon). Concerns from LB Wandsworth and Environment Agency need research to address them. Complex land ownership, including potential covenants. Christopher's Squash club on site and wants to remain. Complex physical issues including flood risk, potential contamination, proximity to waste management site (Wandsworth) | Deliverability meetings starting with all parties to explore whether site suitable, available and viable for each. Technical assessments needed to explore site-specific issues. Possible planning brief to deliver complex site. |
| 38 | Thames Water site, Byegrove Road | Council supports continuation of Metropolitan Open Land / nature conservation contrary to Thames Water desire for housing. | No evidence of deliverability for anything other than metropolitan open land. |
| 41 | Kingston Road opp Lower Downes | Proposed by Wimbledon Society. Potential site availability issues | Exploring deliverability with JC Decaux, who own the site |
| 46 | The Old Lamp works, High Path | Council recommending mix of uses contrary to submission by representative of landowner. | Deliverability meeting to explore owners intentions on site regarding employment element. |
| 48 | Land at Bushey Road | Large site. Proposed by landowners (Ignis and Axa Real Estate) but not unclear whether Axa land ownership is available for development within the next 10 years. | Contacted Axa (owner of 66% of site) to explore whether their element of the site will remain in the plan. Exploring deliverability with Ignis. |
| 49 | Wimbledon Delivery Office | Nearby leisure centre. Seeking clarity from Royal Mail as to future plans for the delivery office – uncertain when / if site will close for its current | Seeking clarity from Royal Mail as to future plans for the delivery office – |

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| | | use. | uncertain when / if site will close for its current use. |
| 50 | 7,8,12 Waterside Way | Proposed by landowner for waste management uses. Can be delivered through planning applications process. | |
| 55 | Field B, St Catherine's Square, West Barnes, Grand Drive, Raynes Park, London | Proposed as Site of Importance for Nature Conservation. Ecological experts have assessed site; their view is that it is not yet of that quality but may become so if site is managed and left to mature. Not recommended as SINC for this development plan. | Recommended to continue as Metropolitan Open Land and other designations on Proposals Map |
| 57 | Morden station offices and retail units | Being explored with Transport for London and others as part of MoreMorden masterplan. | Deliverability connected with other Morden sites. Need certainty on availability and achievability. |
| 58 | Sainsburys (Peel House) | Being explored as part of moreMorden masterplan. Parking research carried out to inform proposals. | Deliverability connected with other Morden sites. Need certainty on availability and achievability |
| 59 | Corner Baltic House and High St Colliers Wood | Small site opposite Colliers Wood tube. Underground electricity cable nearby entering park. Flood risk issues. Owned by Transport for London. | Explore deliverability with Transport for London |
| 60 | York Close car park, Morden | Parking research illustrates usage. Site is owned and proposed by Transport for London and leased by Merton Council. Over 80% occupied, mainly by council staff during weekdays. Connected to moreMorden masterplan | Explore deliverability with Transport for London |
| 61 | Morden station car park | Site proposed by Transport for London. Parking research illustrates usage. Connected to moreMorden masterplan | Explore deliverability with Transport for London. |
| 62 | Wimbledon YMCA | Proposed by YMCA as London headquarters, in design stages with Richard Rogers Architects | Deliverability meeting needed to explore timings. Likely to be within first five years. |
| 63 | Highlands House, 165-171 The Broadway | Potential demand for offices at this site; preferred by council but not currently included in the original representation. To be informed by research (LoveWimbledon / Merton Council) | Explore deliverability to include office potential on site. |
| 64 | 12 Ravensbury Terrace, | Proposal for offices (Reuters expansion) and residential. Environment | Received flood risk assessment for |

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| | Wimbledon Park | Agency issues must be resolved. | site. Expecting letter to confirm Reuters interest and previous investment in the site. |
| 65 | Kenley Road car park, Morden | Parking research illustrates very low usage. Consultation results include concern on design matters, impacts on nearby property and desire for more open space. Entrance in separate land ownership. | Explore deliverability including site's availability, viability, design and timings. |
| 69 | Sibthorp Road car park, Mitcham | Connected to Raleigh Gardens. Constrained site. | Explore options for design and road network / public realm contribution. |
| 70 | Haslemere industrial estate, Wimbledon Park | Employment site, proposed for residential by landowner's representatives, recommended for continued employment use by council. Range of consultation responses including from LB Wandsworth. | Explore deliverability, including with LB Wandsworth. |
| 71 | Land on corner Weir Road / Durnsford Road, Wimbledon Park | Vantage House / Homebase site. Physical constraints (electricity substation, proximity to waste site.) Designated as Strategic Industrial Location. | Need clarity on future of Homebase |
| 72 | Wolfson Hospital, Wimbledon Park | Planning application submitted for nine properties. Site's delivery will be decided before the DPD is completed. | Recommend removal from plan |
| 73 | 117-125 London Road - Dreams | Currently bulky retail, proposed by landowner for all retail, recommended by council for residential, continuing terraces to north. | Explore deliverability with landowner |
| 75 | Southey Bowls Club | Strong response at consultation opposing proposal. Contacted site's representatives to clarify who represents site, whether covenant exists and other deliverability issues. | Clarifying who represents site, awaiting response to determine whether site can be delivered. |
| 76 | Former Mitcham Gasworks | Site owners state that gasworks may be decommissioned within five years, which would open up this site for remediation and potential development. Site lies between Seagas site and Asda | Deliverability meeting to explore likelihood and possible timings of any decommissioning. |
| 77 | 2 south gardens, Colliers Wood. | Bought by council in August 2012 for educational use. Site most recently in educational use | Recommend removal from plan |

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| 78 | 26 Bushey Road | Strong response at consultation from neighbouring residential properties raising concerns over impact on local amenity and property prices. | Need further exploration of design and transport issues which will inform usage. |
| 80 | 191-193 Western Road, Colliers Wood. | Landowner engaged on deliverability. Difficult access to site and close proximity to residential areas and park. | |
| 80 | Crusoe Road | Adjacent 60 Pitcairne Road. | Contacting landowner on deliverability |
| 81 | Pollards Hill (Moat) | Proposed and recommended for masterplanning to inform infill and explore potential redevelopment. | May not need site allocation but planning brief / masterplan. Explore with landowner. |
| 82 | Woodman Works, 204 Durnsford Road, Wimbledon Park. | Site not consulted on. Safeguarded for Crossrail 2, awaiting response on implications of this. | Contacted Crossrail 2 and awaiting response on implications. |

# The London Borough of Merton

## *Draft* Sites and polices DPD
## Proposal map stage 2a

Summary of responses
June – July 2012

# Contents

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# 1 How we got here

During June-July 2012, we invited individuals and organisations to have a say on Draft Sites and polices DPD stage 2a following feedback and comments from the stage 2 consultation in January – April 2012.

Stage 2a comprised:

- 15 additional potential sites for development, including an alternative development use for site 37 Wimbleodn Greyhound Stadium
- Further changes to the Proposal map
- 3 additional development management policies

The additional sites were suggested by public and private sector landowners, community groups, residents and businesses to provide new development uses.

**How we consulted**

- The Council used various methods of communication to raise awareness of this consultation and encourage people to get involved.
- At the start of the consultation 833 emails and 698 letters of consultation notification was sent to residents, those that submitted comments for the '*call for sites'* and *'stage 2'* consultations, community organisations, government bodies' ethnic minority groups/organisation, health organisations, environmental groups and businesses. A full list of those we consulted can be found (appendix 1).

- A public notice and adverts was place in the local Wimbledon and the Mitcham and Morden Guardian newspapers.

- A dedicated webpage to the consultation was place on the Council's website with copies of the Sites and polices DPD and proposal map available to be viewed and downloaded.

- The consultation documents were made available at Merton's reference libraries; some libraries provided a dedicated area for people to review the documents.

- During the July 2012, reminder letters and emails was sent out to consultees that had not at this stage commented on the DPD document; informing them that there was still time to submit comments to the consultation. Furthermore, telephone calls were made to known developers and landowners that there was still time to respond to the consultation.

# 2 Who took part in the consultation

Over thesix- week consultation period the council received comments from the following groups including:

3 residents groups and associations (Apostles Residents Association, Raynes Park West Barnes and Raynes Park and West Wimbledon; RAWW),
37 Residents from across the borough
1 Civic society - The Wimbledon Society with 935 members
9 Statutory bodies (e.g. Environment Agency, English Heritage and Metropolitan Police Service)
2 Party political groups
1 Other businesses ( for example, Christopher's Squash and fitness)

Neighbouring boroughs – London Borough of Wandsworth, Croydon, Sutton, Lambeth, Richmond and Royal Borough of Kingston – upon Thames
The Mayor of London

**Duty to co operate**

Under the Localism Bill (section 110), borough's have a statutory duty to co operate with neighbour borough. The new duty as follows:

- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
- requires that councils set out planning policies to address such issues
- requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
- Requires councils to consider joint approaches to plan making.

In addition, paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate. .

Furthermore, paragraphs 178-181 of the NPPF give further guidance on *'planning strategically across local boundaries'*, and highlight the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans.

# 3 Summary of responses on the potential site allocation

This section gives a summary of the responses received for each potential site allocation. Against each site are the summarised comments received by the council; therefore, the comments should be read as such. For full detailed of all comments can be viewed on the council website at:

http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_dpd/sites_policies_stage2a.htm

We received technical comments from the Environment Agency these can be found on the website link above.

On some potential sites the council received no specific comments however; we did receive general comments which will be considered by the council for all potential sites in the Sites and policies DPD and Proposal map.

## Site 37: Wimbledon Greyhound Stadium

**Current Use:** Greyhound stadium

**Use suggested / organisation:** Drivers Jonas Deloitte on behalf of Hume Consulting Ltd)

**Council's preferred use: (new use proposed for consultation)–** Retain greyhound use of site with enabling development (A1 retail)

### You said:

- Support an intensification of sporting activities (both indoor and outdoor)
- Would welcome retaining the Greyhound stadium
- Christopher's squash and fitness club should be a pre-development condition to remain on the site and be part of future development on the site and a valuable community facility should be protected. (Christopher's Squash and fitness).
- Having a sport at this site helps considerable reduce NHS and council cost and other pressure to these resources. (*Christopher's Squash and fitness)*
- It should be recognised that greyhound racing is a cruel sport that causes unnecessary injuries to greyhounds
- Merton council should stop greyhound racing at the site.
- Our client (Hume Consulting Ltd) proposes to demolish the existing stadium; which is beyond repair, and to re-orientate it within the site. They propose to subsequently construct a new world class track, with a grandstand capable of accommodating up to 6.000 people and it is our client's objective to deliver the best Greyhound racing facility in the world to Wimbledon. Providing such a high quality leisure destination will attract a far wider range of clientele than that which currently frequents the stadium with a particular target to attract a number of corporate companies serving the financial centre of London……. The proposal would also act as a catalyst to physically regenerate the wider area
- Given the poor accessibility of the site, a sequential assessment should be undertaken of Town Centre, edge-of-centre and then out-of-centre sites in accessible locations. Drivers Jonas Deloitte acknowledge that

this work has not been undertaken and state, “As such our client would like to work with the Council to test the suitability of a supermarket / foodstore against the sequential and impact tests defined in the National Planning Policy Framework.”(*Waitrose Plc)*

- In the absence of a defined retail need (for non-central sites) and a sequential assessment of alternative sites against the NPPF criteria, the proposed allocation of the site for a foodstore fails the tests of soundness (NPPF paragraph 182), in that it is not justified and is not consistent with national policy. *(Waitrose)*
- AFC Wimbleodn supporters have identified this site as their preferred choice for a new stadium. *(AFC Wimbledon)*
- The existing preferred option does appear to bring a commercially attractive return and there is evidence of a lack of investment (AFC Wimbledon)
- The site is well serviced by transport which would be excellent for events including football. *(AFC Wimbledon)*
- I favour this site retaining a primarily sporting use. Any increased development must reserve space either at ground level or subsurface for enhanced transport links. This might be a DLR style light railway, tram or Crossrail style main line service. (Extending Tramlink from Wimbledon to the Wandle Valley and then up to Earlsfield and Wandsworth would be one potential scheme).
- Not a fan of greyhound racing but I am an enthusiast of Short Oval Motor Racing i.e. Stock cars etc. This has happily co-existed with the greyhounds for 50 years at Wimbledon Stadium, which is the last such venue in London. The present owners do not seem to be interested in either sport, but perhaps a more certain future would induce them or a new owner to restore the venue to its former status.
- Your general description of the location is a bit negative. There is one bus route which passes the stadium and others which run along Garratt Lane which is only a few minutes walk away. Also the site to the south of the stadium site is described as "industrial". I think "retail" would be a better description. It is those retail outlets which cause most of the traffic congestion in the area, which is a good reason for not allowing any further retail or housing development there.
- Potential for development on this site may impact on the policing needs (MPS)

## Site 64: 12 Ravensbury Terrace

**Current Use:** Office use/ vacant

**Use suggested / organisation:** Residential (C3 use class) and office (B1a) Use Class – Planning Potential (consulting) representing M. Stone (site owner)

**Council's preferred use:** Office and residential

## You said:

- This site, and its neighbour to the south, is significant employment sites providing excellent space for the knowledge-based and creative businesses. Reuters for example is one of the occupiers. Such a location, within easy reach of central London clients, good accessibility to rail, and being close to a good local centre, encourages local regeneration and housing improvements including within LB Wandsworth. *(Wimbledon society)*
- This site (and the Haslemere site noted below) should be seen as important parts of the Wandle Regional Park linear strip. (*Wimbledon society)*
- For the reasons above, floodplain, and retaining local employment; and also because the building itself is of special historic character, demolition should not be accepted, and the use should remain as offices/studios etc. No housing use should be accepted. The reference to the site being affected by the potential Crossrail 2 line is not understood, and if this will affect the excellent character of the river banks, and the Regional Park, then the detailing of this route needs to be rethought. *(Wimbledon society)*
- The site should not interfere with Wandsworth's adjoining Locally Significant Industrial Site nearby (*Wandsworth Council)*
- The site should be used as offices only (*Conservative Group)*

## Site 65: Kenley Road Car park (Adjacent Kendor Gardens, Kenley Road, Merton Park SW19 3HZ)

**Current Use:** Commuter car park

**Use suggested / organisation:** Residential (C3 use class) to be developed in conjunction with the MoreMorden masterplan

**Council's preferred use:** Residential (C3 use class) to be developed in conjunction with the MoreMorden masterplan

## You said:

- Concerns that any development as a residential area will have an adverse impact upon the quality of life and house prices within Daybrook Road.

- A residential development may include a bigger than two story development. There is already a multi-storey development close to the proposed site. A development of similar scale would mean the back of our houses would be in direct site of the development; this would raise issues of privacy and increased noise levels as experienced with the current local development. Multi-storey building would not be in keeping with the current topography of the buildings of Daybrook Road or the local area. Flats would be out of scale.
- It development goes ahead - The block of flats development to the south of the car park is out of scale for the area and the residents of the flats are hemmed in to a small plot. This sort of development should be avoided.
- The car park is adjacent to a green space and this should be capitalised upon. A residential area could be designed in a way to be an extension of the park with open space and trees.
- There is a demand for allotments in our area. There are none close by. Some of the area could be put aside for this use.
- Our preference would be for expansion of the Kendor Gardens area into a more useable recreational space for the increasing number of families in the immediate area with young children. An alternative would be to provide allotment type space to encourage the production and sharing of produce amongst the immediate community again benefitting the growing numbers of children and community spirit in general.
- I support intensification of residential development around all existing railway stations in Merton, including this one. I would support "encouragement" or compulsory purchase to enlarge the site to form a more unified development.
- Being within the Morden Masterplan area, there should be no ad hoc decisions on any sizeable sites such as this until that masterplan has been produced. This is eminently achievable as the car park site is in Council ownership. The existing open space (Kenley Park) to the west is also Council owned, but being very narrow (it exists because of the need to protect the tunnels coming up from the underground line) it is not easily able to accommodate a wide range of activities. It is therefore a pleasant walk, with planting, but little else. If any of the present car park land became surplus to requirements, then rather than the suggested housing (not accepted as the site is landlocked, and there is sufficient housing in the Plan), adding this area of land to the existing Park should be considered. *(Wimbledon Society)*

## Site 69: Sibthorp Road car park

**Current Use:** Car park

**Use suggested / organisation:** Town centre uses – Merton council

**Council's preferred use:** restaurants/café and residential

You said:

- The present appearance of the rear of this street block is lamentable, and contributes to the very poor quality of the local environment around Fair Green……. Creating a central Square within the street block would make a place of local interest, allow the existing business frontages to remain, and draw together the pedestrian routes. (*Wimbledon Society*)
- Small scale business uses are needed locally, and could help to regenerate the economic activity of the Fair Green area, and these could be considered as well as some retail/café etc type uses *(Wimbledon Society).*
- Residential is not considered to be appropriate as a major user. *(Wimbledon Society)*
- Enough car parking for the proper operation of the whole centre is an essential, and therefore no decision should be pre-empted for this site, until the overall Plan for Mitcham Fair Green has been produced. *(Wimbledon Society)*

## Site 70: Haslemere Industrial Estate Haslemere Industrial Estate, 20 Ravensbury Terrace, Wimbledon Park SW18 4RL

**Current Use:** Business/ light Industrial (B1)

**Use suggested / organisation:** Alternative uses on the site (such as residential) Jones Lang LaSalle on behalf of Astranta Asset Management

**Council's preferred use:** Business/ light Industrial (B1)

You said:

- I certainly support the usage of the proposer of the site for the following reasons, owning a property that backs onto the estate we currently experience; the early hours noise due to operation of the factory and the early hours of HGV driving outside our property and reversing back into the estate. Also, asbestos clad properties backing onto our residential street and the strong smell of food production from the factory. On balance I think a residential development would add more value to the local community. *(resident)*

- Any development must not restrict the main railway line, which may need to be widened from 4 tracks to 6 tracks. (An extra 2 tracks are definitely needed; however it may be cheaper to place them in tunnel than widen the surface railway).
- The Council's preferred business use is favoured. *(Wimbledon Society)*

## Site 71: Land on Corner of Weir Road/ Durnsford Road

Homebase and Vantage House, 1 Weir Road, Wimbledon, SW19 8UG.

**Current Use:** Offices partly vacant, Homebase retail unit, associated car parking, electricity sub station

**Use suggested / organisation:** Hotel, A3 Use, residential – Blue Sky Planning on behalf of LaSalle Investment Management
**Council's preferred use:** Industrial and warehousing (B1b, B1c, B8)

### You said:

- The existing uses on the site are offices and retail use in addition to the electricity substations. As such there are no industrial uses which prevail on this site. It is therefore considered that the site itself does not contribute to the "reservoir" of industrial uses. In addition the site is situated on the edge of a strategic industrial location and surrounded by a mix of residential and commercial uses. *(Blue Sky Planning on behalf of HSBC Pension Trust (UK)Ltd*
- On the basis that it is not proposed to de-allocate the SIL in its entirety, we do not consider that by releasing part of the SIL that the existing "reservoir" of SIL's will not be compromised. We consider that regeneration benefits will be maximised if the site is released from its SIL designation and that it could be redeveloped for alternative uses. Moreover, on the basis that this site has not been in industrial use for at least 30 years, we do not consider that the release of this site will displace any industrial uses. (*Blue Sky Planning on behalf of HSBC Pension Trust (UK )Ltd*
- We do not consider that the de-designation of this part of the industrial allocation would alter the industrial character of the area or inhibit the operations of nearby industrial uses. Given that the site lies on the southern tip of the SIL the redevelopment of the site for alternative uses will not prohibit or compromise the wider area of the SIL to the north of the subject site. The SIL to the north of the subject site will be able to functions in its entirety with a defensible southern boundary with the release of the subject site. *(Blue Sky Planning on behalf of HSBC Pension Trust (UK) Ltd*
- We have been advised that Vantage House has been marketed over many years and attach a copy of the current marketing details. The existence of these lettings does not show that the property has a market for which there is an unfulfilled need. Clearly the building has been properly exposed to the market and this has been

demonstrated over a period of 15 years that it is not required to meet the needs of occupiers in the area. Homebase unit is in use as a retail warehouse and has not, therefore, been marketed. *(Blue Sky Planning on behalf of HSBC Pension Trust (UK)Ltd*

- This site is very near Vineyard Hill surgery which needs replacing. It will place additional burden on existing facilities which will require investment to meet the additional demand. (NHS)
- The Wandle Valley must be served by tram, light rail or main line services before any further intensification can be considered. However, with such transport, there is huge opportunity for major residential development along the valley. If this particular site is developed, other neighbouring sites must be "encouraged" to be developed as well.
- The site forms part of an extensive area of commercial and employment related land, including service industry and depots. Introducing housing into this zone would be contrary to Plan policy on protecting employment; the site is also not well served by public transport, and no housing should therefore be accepted. *(Wimbledon Society)*
- The Council's preferred use of industrial/warehousing could be accepted, although the addition of some more office based accommodation could act as a stimulus to local start-up business. *(Wimbledon Society)*
- Potential for development on this site may impact on the policing needs (MPS)

## Site 72 Wolfson Centre site on Copse Hill

**Wolfson Rehabilitation, Copse Hill West Wimbledon SW20 ONJ**

**Current Use:** St George's Healthcare NHS Trust as a Neuro-rehabilitation Centre

**Use suggested / organisation:** Residential –Indigo Planning on behalf of Berkley Homes
**Council's preferred use:** residential

### You Said:

- Site would appear to be suitable for residential development. Public transport access is a concern however; the plan of the site is inaccurate. The site as already sold to a developer includes an area of Metropolitan Open Land to the west of the area shown. Strategic planning factors should include mention of this area of MOL and the restrictions that must apply. Use of MOL for residential development, including private gardens is not a permitted use of MOL. The Council's preferred use for residential cannot be applied to the MOL. The delivery timescale is now known as the developer is already drawing up plans and held an initial public consultation on these. *(The Residents' Association of West Wimbledon)*
- The Council's preferred use should be - Residential, Public Open Space (i.e. MOL) and Bus turnaround.

## Site 73 117- 125 London Road – Dreams store
**Dreams Bed Superstore, 117- 125 London Road, Mitcham CR4 2JA**

**Current Use:** Retail warehouse – restricted to bulky goods (A1)

**Use suggested / organisation:** Retail (Class A1) –Planning Potential on behalf of GBRE Global Investors

**Council's preferred use:** Mixed use – residential (C3 and limited retail/community use)

### You Said:
No comments received.

## Site 74: Southey Bowls Club **Sothey Bowls Club, 559 Kingston Road, Raynes Park SW20 8SF**

**Current Use:** Bowls Club

**Use suggested / organisation:** Residential and Bowls Club or residential – Kossway Ltd on behalf of Southey Bowls Club

**Council's preferred use:** Bowls Club/ residential

### You said

- I vehemently object to any development on Site 74 Southey Bowls Club.
- My garden backs on to the bowling green and we bought the house because of the bowling green. The bowling green / club means the gardens and house are not over looked, they add life and atmosphere to the local environment as we can often hear the nicely competitive spirit
- Any residential building will change the nature of this area by blocking views, creating a potential eye saw and increasing traffic along the very narrow lane.
- The access lane is intended for 1 or 2 cars not for residents driving in and out all day long and for emergency services and does not comply with currant legislation.
- Changing the nature of this site will affect the sale-ability of my house and therefore the price.
- There is a covenant on the land for use as a sports complex only and not residential.
- The drive in, first seven houses (entrance for vehicles) is owned by the residents and under their deeds is not for general access to anyone other than SBC and its vendors

- When I purchased this property it was with the understanding that there will be no building allowed. Does this mean you will be paying compensation to the residents for loss of peace and tranquillity and chance of use?
- A small residential development would seem suitable on this site

## Site 75: Former Mitcham Gasworks 49 Seagas House, Western Road, Mitcahm CR4 3ED

**Current Use:** Vacant; last used as regional offices for National Grid. The site has outline planning permission for a major residential employment scheme

**Use suggested / organisation:** Residential and retail (convenience) – Drivers Jonas Deloitte on behalf of National Grid

**Council's preferred use:** Proposed uses will be dependent on the decommissioning of the gasholder

## You said:

- Reasonable flexibility is required to allocate the site for higher value uses, to promote the successful regeneration of the site and ensure that any proposed redevelopment is financially viable. Therefore, we request that the draft site allocation identifies the potential for residential and retail uses, subject to the decommissioning of the gasholder, evidence of financial viability and (where necessary) a retail impact assessment. *(Drivers Jonas Deloitte on behalf of National Grid)*
- The quantum of each use should be determined at the planning application stage, taking into account financial viability and the high costs of decommissioning and remediation. *(Drivers Jonas Deloitte on behalf of National Grid)*
- This major site would be suitable for residential development however; it is too remote from good public transport access to key centres, including Wimbledon, Croydon and London.
- This site also represents a key potential route for Tramlink to access central Mitcham, via Hallowfield Way and Miles Road. A tram to this area would dramatically change the perception of Mitcham.
- Potential for development on this site may impact on the policing needs (MPS)

## Site 76: 2 South Gardens **Jamia Ahamdadiyya, 2 South Gardens, Colliers Woods, SW19 2NT**

**Current Use:** Residential School

**Use suggested / organisation:** Residential –AMA UK

**Council's preferred use:** Education (Uses D1, C2)

You said:
No comments received

## Site 77: 26 Bushey Road **Raynes Park Service Station, 26 Bushey Road, Raynes Park SW20 8LW**

**Current Use:** Vehicle repair, maintenance, sales and valet

**Use suggested / organisation:** Residential – Kingsley Nicholas & Ward on behalf of Rightway Corporation Limited

**Council's preferred use:** Residential

You said:

- We are absolutely not in favour of new housing being built here. The site is within the slim foot printed area: 26 Bushey Road.
- New housing building here would lead to severe issues with overcrowding, noise, space and a real invasion of privacy not only into our back garden but also rear facing rooms, two of which are bedrooms.
- Development of housing within this small area will also severely restrict sunlight from our garden and the rooms within our home - light from the rear garden even brings light into the ground floor at the front of the house. We firmly believe the site is simply too small to accommodate plans for residential occupation.
- Parking would also present a major issue as parking spaces are currently extremely limited and this is not set to improve as more local roads are becoming residential parking bays
- This part of Kingston Road is already extremely busy and cars move quickly along this key road, the creation of yet more traffic and congestion we do not believe will prove to be beneficial on any level, socially or environmentally.
- We understand the land was to be kept as commercial use and provide employment, and not to be turned into residential use.
- If made into residential properties this will be too imposing to the properties on Bronson Road (even numbers).
- The loss of established trees and foliage due to the proposed works is un-repairable.

- The ever increasing number of residential properties in the area (including houses made into flats over the years) are impacting on the area, especially since no more schools, shops and designated parking are available, having a detrimental effect on the local infrastructure and resources.
- This site would appear to be too restrictive in size and shape for a residential development. If a significant section of the properties along Kingston Road were developed at the same time, them the site would have suitable size and integrity.

## Site 78: 191-193 Western Road 191- 193 Western Road, Mitcahm CR4 3ED

**Current Use:** Factory and Open storage

**Use suggested / organisation:** Residential – James Davis

**Council's preferred use:** Residential

You said:

- This site would be suitable for residential development; however it is relatively distant from Colliers Wood station and primarily served by bus.
- Retain as employment

## Site 80: Crusoe Industrial Buildings 45A and B, Crusoe Road, Mitcham CR4 3LI

**Current Use:** Light Industrial

**Use suggested / organisation:** Residential/ or compatible use – Councillors Draper and Attawar

**Council's preferred use:** Residential

You said: One comment – retain as employment uses

## Site 81: Moat Pollards Housing Estate – Berkshire Way, Brecon Close, Caernarvon Close, Cheshire Close, Glamorgan Close, Huntington Close, Kent Close, Lindsey Close, Monmouth Close, Radnor Close, Shropshire Close and South Lodge Avenue, Mitcham CR4

**Current Use:** Residential housing estate (use class C3), Open space, library and community use (use D1 and D2)

**Use suggested / organisation:** Residential (use C3), supported care homes (use C3), Office (B1) and community (D1) – Savills on behalf of Moat Homes Ltd

**Council's preferred use:** Redevelopment proposal should be delivered via a *masterplan (supplementary planning document) for the site which involves the local community in the potential uses and design for the area

* Redevelopment proposal led by a masterplan for this area will help co-ordinate where infill development of new homes might be most appropriate, to support investment in environment improvements to wider area. This is Moat's current priority.

You said:

- The PCT requires more information on the expected capacity of this site for example net additional population. It is very close Croydon boundary. The nearest surgery is Leander Rd (CPCT). Nearest SMPCT premises are Wideway and Tamworth House which are not close and this may require investment to support increased capacity. (NHS)
- This site is a long way from significant public transport, which devalues any development. Any masterplan should address improved transport access as a priority.
- This site is adjacent to Pollards Hill, designated as Local Open Land and a site of Nature Conservation Importance in the Croydon Plan, 2006. Any redevelopment, particularly intensification of residential use should consider the impact on Pollards Hill, opportunities for enhancing local character and potential impact on the local transport network. In Appendix 5 of the Council's Submitted Core Strategy, a Panorama is identified from Pollards Hill looking into Croydon. Part of the Site 81 would be visible from this viewpoint and any proposed redevelopment would need to be assessed for its visual impact. (Croydon council)
- Potential for development on this site may impact on the policing needs (MPS)

# 4 Summary of responses on the development polices

This section gives a summary of the responses received for the three additional development management policies.

Against each policy are the summarised comments on the development polices received by the council; therefore, the comments should be read as such.

| Development policy | Summary of comments received |
|---|---|
| DM.H3 Support for affordable housing | Para 3: Omit "but no higher unless agreed as an exception". Adding this phrase, which encourages endless prevarication and discussion between developer and Council, is unhelpful, and waters down the clarity which should underpin all Plan policies. This is a criticism that could be taken up through the whole Plan document, and applicants and public need to be clear what the thrust of any Plan policy is. *(Wimbledon Society)*<br>The Mayor of London does not support this policy as it is not in line with the Further changes to the London Plan. The London Plan amendments propose that borough's planning policies for affordable rent follow the London Plan of up to 80% market rent. |
| DM.H4 Demolition and redevelopment of single dwelling house | Parts: a, b and c: The Society supports the principle of requiring higher standards for replacement houses, but, given that new housing is going to be required to meet Code level 6 in 2016, and the closeness of the Plan to this date, it is unrealistic to specify that replacement houses should now only have to comply with Code 5 level: the Merton Rule approach has been seminal in recent years: Code 6 should therefore be specified.<br>It is clear from independent and continuing technical studies that the estimated additional cost of achieving Code 6 level in an individually designed detached modern house is around some £30k. The cost is reducing as experience is gained, and some equipment manufactures are claiming lower figures.<br>When (for example) the new houses in the Firs development off Copse Hill are to be sold for between £2.5 and £4m, it seems bizarre that they were only required to incorporate Code 4 design concepts.<br>As has already been demonstrated in built schemes elsewhere, achievement of Code 6 is practicable in various types of new house, including social housing. *(Wimbledon Society)* |
| DM.EP4 Allowable solutions | This proposal to allow developers to avoid designing new buildings that properly comply with a Code level and BREEAM standards should not be accepted.<br><br>It is highly likely that such an option will be used by developers to justify inefficient development and sustainability performance in new buildings. And there will then be time consuming and expensive "negotiations" with the Council officers, reports to and from a technical group, all probably resulting in an overall financial saving to developers and poor performing buildings. Council Plan |

| | |
|---|---|
| | policy should instead say clearly that the aim must be for all new development to be built to proper modern standards, and offsetting should not be an option.<br><br>This policy should then establish the primacy of the local Plan over any other scheme, whether nationally promoted or not. Instead of (see (a)) relying on a "Working Group" giving their value judgments on schemes, the Plan should instead set out strict technical criteria that need to be complied with. The legacy of the Merton Rule should not be fudged. |

# 5 Summary of responses on the Proposal Map

This section gives a summary of the responses received for proposed changes to Merton's Proposal map.

**Raynes Park town centre boundary:**

All the comments strongly opposed changes to the existing UDP town centre boundary.

- Strongly disagree with the removal of all of the area south of the railway line in Raynes Park town centre from designation as a local centre. Bear in mind that all rail services from London in the evening (the primary inward flow) arrive on the south side, thus some retail element here is desirable.
- More broadly, Raynes Park town centre is undervalued by the plan and should be treated as being more significant than Motspur Park for example. There is a high density of local population due to the terraces plus a major railway station, yet the plan effectively encourages people to travel to Wimbledon or Colliers Wood. Similarly, people are encouraged to travel to Wimbledon Village for restaurants.
- Instead of this negative thinking, Raynes Park town centre should be encouraged to grow, perhaps with Lambton Road as a pedestrian street and the removal of the one-way system.
- Strongly object to the LDF Proposal Map Local Centres Raynes Park. The centre area of Raynes Park has been substantially reduced without any adequate planning justification. The enhancement area north of the railway is reduced ,and the old UDP centre boundary has been reduced in its entirety.

# 6 Appendix 1 - Who was consulted?

**Statutory consultees**

British Gas Plc
CPRE London
Department for Culture, Media and Sport (DCMS)
Department for Business Innovation and Skills
Department for Energy and Climate Change
Department Environment Food Rural Affairs
Department for Work and Pensions (DWP)
English Heritage
EDF Energy Properties
Environment Agency
Greater London Authority
Highways Agency
London Ambulance Service
London Borough of Croydon
London Borough of Wandsworth
London Borough of Sutton
London Borough of Kingston
London Energy
London Fire and Emergency Planning Authority
Local Government Association
Merton Priory Homes
Metropolitan Police Service
Metropolitan Police Authority
Mobile Operators Association (MOA) c/o Mono Consulting ltd
Natural England
Network Rail
National Grid
NHS London Healthy Urban Development Unit
Planning Inspectorate
Powergen Plc
Royal Borough of Richmond
Royal Borough of Kingston upon Thames
Sutton and Merton Primary Care Trust
South West London NHS Support Services Partnership
South London Partnership
The Coal Authority
Transport for London
Thames Water Utilities Ltd
Transport for London - Borough Partnerships
Virgin Mobile

**Residents associations, groups, organisations and Civic organisations**

Abbey MAG (Multi-Agency Group)
Amity Grove Residents Association
Apostles Residents' Association
Arthur Road Association
Colliers Wood Community Association
Colliers Wood Residents' Association
Cottenham Park Allotments
Community of Woodside Area Residents' Association (CWARA)
Drax Avenue Road Committee
Garth Residents' Association
Graham, Hartfield and Herbert Roads RA (GHHRA)
Grange Residents Association
Harland Estate Residents Association (HERA)
Hillcross Community Action
Homefield Road Residents Association
Lambton Road CA
Lavender MAG (Multi-Agency Group)

Lower Edge Hill and Darlaston Road Residents Association
Merton Park Ward Residents Association
Merton Allotments and Gardens Association
Mitcham Society
Mitcham Working Group
North West Wimbledon Residents Association
Phipps Bridge and New Close Residents Group
Phipps Bridge MAG (Multi-Agency Group)
Princes, Dudley and Kings Road Association
Ravensbury Lanes and Avenues Residents Association
Raynes Park Association
Raynes Park and West BARNES Residents Association
South Mitcham Community Association
South Park Estate Residents' Association (SPERA)
South Ridgway Residents Association
The Raynes Park Association
The Wimbledon Society
Treasurer Belvedere Estate Residents Association
Village Residents Association (Mitcham)
West Wimbledon Residents' Association
Willow Lane Action Group
Wimbledon Park Residents Association
Wimbledon East Hillside RA
Wimbledon Union of Res Ass (WURA)
Wimbledon Common West Residents Association
Wilmore End Residents Association
Wimbledon Civic Forum
Wimbledon E Hillside Residents' Association (WEHRA)

**Ethnic Minority groups and organisations**

Abaana Bantu
African Community Involvement Association
African Culture Promotions
African Educational Cultural and Health Organisation (A.E.C.H.O)
African Refugees Project
Ahmadiyya Muslim Women's Association
Asian Elderly Group of Merton
Asian Women Feeling Good Group
Asian Youth Association
Asylum Welcome
Baha'i Community of Merton
Bangladeshi Association of Merton
Bengali Association of Merton
Black Ethnic Cultural & Welfare Organisation (BECWO)
BME TVFM Charitable Foundation
Breaking Free
Ethnic Minority Centre
Ethnic Minority Drugs Awareness Project and Merton African Organisation
London Oriel Cultural & Social Club
London South West Chinese Community Association
MeMu (Merton Multicultural Cooperative Ltd)
Merton & Wandsworth Asylum Welcome
Merton Racial Equality Partnership
Merton Sickle Cell and Thalassaemia Group
Merton Somali Community (MESCO)
Merton Unity Network
Pakistan Cultural Association - Merton & Wandsworth
Pakistan Welfare Association
Pearl of Africa Foundation (PAF)
Polish Family Association

Somali Support Solutions
South London African Klomen Organisation (SLAKIO)
South London Irish Welfare Society
South London Refugee Association
South London Somali Community Association
South London Tamil Welfare Group
Sutton and Merton Traveller Education Service
The Gypsy Council
The Migrant and Refugee Communities Forum
The School of Oriental and African Studies (SOAS)
Travellers/Gypsies Advisor
World Tamil Organisation (UK)

**Residents**

A total of 526 emails and letters were sent to Merton residents.

**General bodies**
Merton Chamber of Commerce
Morden Town Centre Partnership
Chartered Institute of Personnel and Development
South Wimbledon Business Area Group
Sutton Business Centre

**Businesses**

AHC Associates
Aubergine Art & Picture Framing Ltd
Barclays Bank plc
BERA
B & D Clays & Chemicals Ltd
B G Transco
BSKYB
Cantium (Beddington House) Ltd
Centre Court Shopping Centre
Chris Thomas Ltd
Dignity Funerals Ltd
Director AT. s.coop.v
Ecotricity
Ferncombe Properties
Functional Intelligent Training
Gala Coral
Gerald Eve
Gina's Nannies
GRA Acquisition
Herrington Consulting Ltd
HH Technology T/A Art of Computing
Hutchinson 3G
Killoughery Group
Landsdale Florists
Lafarge Aggregates Ltd
L&M Materials
London Interspace Ltd
Luxury Estates Limited
McDonalds (Mitcham)
Meganexus Limited
Mono Consultants
Navalmar (UK) Ltd
PAG Limited
Pavnells Agents
Royal Mail Group Limited
Rule Financial
Sita UK (South East)
South London Crematorium
Sterling Insurance Group
Stewart Ross Associates
TG21 plc
The Mill House Brewers Fayre
T-Mobile
The Watershed
UK Asset Managers Ltd
Up-Town Dance Club and Learning Centre
Utilita Services Limited
Vodafone Ltd
Windsor Stebbing Marsh
Workspace Group Plc
Wrenshaw Court Freeholders

YRM Architects

**General consultees**

a2 Dominion
a2hg
Abbotsbury Primary School
Aberdeen Asset Management
Ability Housing
Aegon Ul Property Fund Ltd
Affinity Sutton
Ahmadiyya Muslim Association (EMC)
All England Lawn Tennis Club
All Nations Revival Church
All Saints CE Primary School
All Saints Church, South Wimbledon
Alliance Property Developments Ltd
Amazon Properties plc
Amicus Horizon Group
Anchor
Antler Homes Southern Plc
Aragon Primary School
Armchair London South (Buses)
Arriva London South Ltd
Arup
Ashill Developments
ATIS Real Weatheralls
Audichya Gadhia Brahma Samaj Society (AGBSS)
Axa Real Estate
B E Manji & S B Manji
Baker Associates
Balham Sport and Social Club
Barnfield Construction (UK) Ltd
Barratt Homes
Barton Willmore Planning
Beecholme Primary School
Bellway Homes
Benedict Primary School
Bentley-Leek Properties Ltd
Berkeley Homes (Urban Renaissance Ltd)
Bewley Homes
BFL Management Ltd
Bishop Gilpin CE Primary School
Bishopsford Community
Blackrock (owners of Plough Lane)
Blossom House School
Blossom House Special School
Blue Sky Planning
Bond Primary School
Bree Day Partnership
Brian Madge
British Motorcyclists Federation
British Muslim Association of Merton
Brixton Plc
Broomleigh Housing Association
Burgess Mean Architects
Bus Priority Team
CABE
Cadugan Developments Ltd
Cappagh Group
Carers Support Merton
Carpenter Planning Consultants
Casson Conder Partnership
Catholic Children Society
CDC2020
Central and Cecil Housing
CGMS Consulting
Chase Hospice Care For Children
Cherwell Land and Homes Ltd
Children and Parents Carnival Association
Christopher St James PLC
Church Commissioners
City Bridge Trust
Civil Aviation Authority
Cluttons LLP
CMA Planning
Colliers Wood Youth and Play Working Party
Colliersbridge Properties Ltd
Collins Planning Services Ltd
Commonside Trust
Community Home Care Provider
Connexions Prospects
Conrad Phoenix London Ltd
Costco Wholesales UK Ltd
Countryside Properties PLC
Cranbourne Ltd
Cranmer Primary School
Cricket Green Medical Centre

Cricket Green Special School
Crown
Croydon Churches Housing Association
Date Valley
Design for London
Development Planning Partnership
Dialogue
Director Hese-UK
Disability Alliance Merton (DAM)
Dominion
Donhead Preparatory School
Dons Trust Board
DP9
DPP
Drakesfield Management Ltd
Drivers Jonas Deloitte
Drivers Jonas LLP
DTZ PIEDA Consulting
Dundonald Congregational Church
Dundonald Primary School
Dunward Properties Ltd
Eagle House School Special School
East Thames Buses
Edco Design
Ekaya
Elim Pentecostal Church
Elliott Wood Partnership
Empire Estates (GB) Ltd
English Churches
English Sports Council
Epsom Coaches
ESA Planning
Ethnic Minority Housing Strategy Team
Euroworld Developments Ltd
Fabric Warehouse
Faith in Action Homelessness Project
Faithfull Architects
Family Housing Association
Family Mosaic
Farm Road Church
First Capital Connect (Thameslink)
Firstplan
Firstplus Planning
Floyd Slaski Partnership
FND Group
Freight Transport Association
Friends of Cottenham Park
Friends of Dundonald Park
Friends of Durnsford Recreation Ground
Friends of Haydons Road Recreation
Friends of Holland Gardens
Friends of Phipps Bridge (FoPB)
Friends of Ravensbury Park
Friends of Sir Joseph Hood MPF
Friends of South Park Gardens
Friends of Tamworth Farm
Garden Primary School
Genesis
GHG
Girl Guides Wimbledon Division
GL Hearn
Glenroy Estates Ltd
Go Forum
Goldcrest Homes (Colliers Wood) Ltd
Goodman Property Investors
Gorringe Park Primary School
GP Mitcham Medical Centre
Gregory Gray Associate
Grenfell Housing Association
GVA Grimley Ltd
Gypsies and Travellers
H Patel
Haig Homes
Hall School
Harris Academy Merton
Haslemere Primary School
Hatfeild Primary School
Hepher Dixon - Planning and Regeneration
Hermes Real Estate
Hi-Dra Consultants Ltd
Hillcross Primary School
Hollymount Primary School
Holy Trinity CE Primary School
Home Builders Federation Ltd
Home Group
Housing 21
HOW Planning
Humphreys &Co solicitors
Hyde Housing Association
Ignis Real Estate
Indigo Planning
Inland Waterways Association

Insight
Institute of Cancer Research
International Properties (Wimbledon) Ltd
J.G. Land Estates
Jenner Jones Surveyors
JKL Architects and Town Planners Ltd
JL Planning
JMP
John Sharkey & Co
Jones Lang LaSalle
Joseph Hood Primary School
Kelsey Housing Association Ltd
Kender Homes
Kennet Properties Ltd
Key London Alliance
King Sturge LLP
Kings College
Kirkwells
Knight Frank LLP
Kossway
L&Q Tower
Lakebird Properties Ltd
Lavender Fields Surgery
Leander (Wimbledon) Ltd
Lennon Planning Limited
Lewis and Hickey Architects
Liberty Primary School
Lichfield Planning
Lidil UK GmbH
Links Primary School
Linkwood Consultants Ltd
Little League Mitcham
Little League Wimbledon
London and Quadrant Housing
The John Innes Society Trust
London Borough of Westminster
London Buses
London Cycling Campaign
London Fire and Emergency Planning Authority
London General (Buses)
London Genral Transport Services Ltd
London Housing Federation
London Property Holdings Ltd
London Travel Watch
London Underground
London United Busways
Lonesome Primary School
LQ Group
M & M Architectural Services
Majorlink Ltd
Malcolm Scott Consultants Ltd
Malmesbury Primary School
Marcus Beale Architects Ltd
Mary Tate Almshouses
Maurice Cox
Mayer Brown Limited
McCarthy & Stone (Developments) Ltd
Melrose Special School
Merton Abbey Primary School
Merton Carers Partnership
Merton Cycling Campaign
Merton Design Review Panel Members
Merton Development Officer
Contact a Family Sutton and Merton
Merton Executive Committee
Merton Hall FC
Merton Hard of Hearing Group
Merton Mental Health Users Forum
Merton Park Primary School
Merton Pre-School Learning Alliance
Merton Priory Homes
Merton Youth Awareness Programme
Merton Youth Forum
Merton Youth Parliament
Metrobus Ltd
Metropolis Planning and Design
Metropolitan Housing Trust
Metropolitan Public Gardens Association
Millat Asian Housing Association
Mitcham Baptist Church
Mitcham Congregation of Jehovah's Witnesses
Mitcham Cricket Green Community & Heritage Trust
Mitcham Parish Church
MOAT
Morden Cricket Club
Morden Little League
Morden Park Baptist Church

Morden Park Playing Fields Association (MPPFA)
Morden Primary School
Motorcycle Action Group
Nathaniel Litchfield and Partners
Neighbourhood & Primary Care Development
Network Rail asset management
New Life Assembly Worship (SMCA)
Newridge Trading Limited
NHP Group
Norman Road Haulage (Wimbledon) Ltd
Notting Hill Housing Group
Orbit
Palace Gate Properties Ltd
Parsons Brinckerhoff
Pathway
Paul Brookes Architects
Paul Dickinson & Associates
Peabody
Peacock and Smith
Pelham Primary School
Peter Pendleton & Associates Ltd
Phoenix Logistics Limited
Planning & Regeneration Ltd
Planning Perspectives
Planning Potential Ltd
Planning Works Ltd
Poplar Primary School
Port of London Authority
Possfund Custodian Trustee Ltd
Presentation Housing Association
Priory CE Primary School
Project Design Partnership
Quality Line
Quod Planning
R P S Planning
Ramblers' Association
Rapleys LLP
Raynes Park Secondary School
Renaissance Planning
RIBA
Ricards Lodge Secondary School
Riverside
Road Haulage Association
Robert Turley Associates
Robinson Escott Planning
Roger Miles Planning Ltd
Roger Tym & Partners
Rolfe Judd Planning
Roman Catholic Church (SMCA)
Rowans Surgery
Royal Marsden NHS Foundation Trust
RPS Planning (West London office)
Rutlish Secondary School
Ryhurst Limited
Sacred Heart RC Primary School
Sainsbury's Supermarkets Ltd
Salvation Army Wimbledon Corp
Sanctuary
Savills (Wimbledon office)
Savills Commercial Ltd
Savills/Schroders Team
Scott Wilson
Scout Association- Wimbledon and Wandle District
Service Improvement Manager
Seventh Day Adventist Church (SMCA)
SHA Estates - London
Shauket Hussein and Amtul W Hussien
Sherwood Primary School
Shire Consulting Ltd
Shree Ghanapathy Hindu Temple
Signet Planning
Simon Charles Hanks
Singlegate Primary School
Smart Centre
Somerfield Stores
South London Freight Partnership
South Thames College Merton Campus
South West London Health Partnership
South West Trains
Southern (Railway)
Spacia (Network rail)
Squirrels (CSS)
SS Peter and Paul Primary School
St Ann's Special School
St Barnabas Church - Mitcham
St Christopher Fellowship
St George's Healthcare - Voluntary Services Dept
St Helier Congregational Church
St Heliers Methodist Church

St Marks Church of England Academy
St. John Fisher RC Primary School
St. Mark's Primary School
St. Mary's RC Primary School
St. Matthews CE Primary School
St. Peter & St Paul RC Primary School
St. Teresa's RC Primary School
St. Thomas of Canterbury RC Primary School
Stanford Primary School
Star Planning & Development
Strategic Perspectives LLP
Study Preparatory School
Superdrug Stores plc
Sustrans
Sutton & Merton Primary Care Trust
Sutton and Merton PCT
Tamil Housing
Taylor Wimpey UK Ltd
TCL (Tramstrack Croydon)
Terry Pawson Architects
Tesco Stores Limited
Tetlow King Planning
Thames Valley Housing Association
Thames Water
The Barton Willmore Planning Partnership
The Diocese of Southwark
The Dons Trust
The Hards Partnership
The Harris Academy Merton
The Hon. Soc. of the Inner Temple
The John Innes Society
The Lawn Tennis Association
The London School of Economics and Political Science
The Norwegian School
The Planning Bureau Limited
The Rowans School
Threshold Housing Association
Tibbalds Planning and Urban Design Ltd
Tooting & Mitcham Sports and Leisure Ltd
Tower Homes
Transport and Travel Research Ltd
Transport for London (TfL)
Travel London
Travis Perkins Plc
Tribal M J P
Trinity Church Wimbledon
Turley Associates
TVHA
United Response
URS Scott Wilson
Ursuline Preparatory School
Ursuline RC Secondary School
Viridian Housing
Viscount Cricket Club
Waitrose
Wandle Housing Association
Warden
Wardens Surgery
West Wimbledon Primary School
White Young Green
William Morris Primary School
Willington School
Wilmot Dixon
Wimbledon Chase Primary School
Wimbledon College RC Secondary School
Wimbledon Common Preparatory School (Squirrels)
Wimbledon High School
Wimbledon International 7th Day Adventist Church
Wimbledon Jewish Reform Synagogue
Wimbledon Library
Wimbledon Park Heritage Group
Wimbledon Park Primary School
Wimbledon Taxi Drivers
Wisepress Ltd
WM Morrison Supermarkets PLC
WS Atkins plc
YMCA (Wimbledon)
Youth Culture Television (YCT)