

Appendix A – borough Plan Advisory Committee 3rd March 2021

Summary of the consultation feedback for Merton’s Local Plan Stage 2a public consultation – February 2021

This documents summarise some of the key policy issues that are emerging from consultation analysis of the +250 responses received to Stage 2a (closed February 2021) The full responses to the consultation are available online [Local Plan stage 2a consultation responses \(merton.gov.uk\)](https://www.merton.gov.uk/local-plan-stage-2a-consultation-responses)

Climate Change

The responses relating to climate change fall into 2 broad categories:

- Comments on the Climate Change policies – Responses were for the most part supportive of the policies with a couple of specific suggestions which we can consider as part of the review.
- Comments on the Local Plan as a whole – A significant proportion of the responses we received on climate change matters requested more emphasis on climate change throughout the Local Plan including better linkages with other policies.

A number of respondents suggested bringing the borough climate emergency target forward from 2050 to 2030. While this is not wholly a Local Plan matter, it is worth noting that the 2050 borough target was set in line with national commitments, but the climate change policies aim to ensure that all new development built from 2025 is capable of operating at net-zero carbon by 2050 without the need for expensive retrofit. New development (c500 homes and properties built per year) also makes up a very small proportion of our actions on reducing carbon compared to the +86,000 existing homes and buildings in the borough *No changes proposed at this stage*.

A couple of respondents raised concerns regarding the use of carbon offsetting to achieve the zero carbon target. We can review the wording to explain how this works in a bit more detail and to emphasize clearly that developers will be expected to maximise carbon savings on site before carbon offsetting is accepted.

Emphasizing climate change elsewhere in the Local Plan:

We received a number of responses regarding the emphasis on climate change in the Local Plan more broadly, particularly in the Good Growth and Objectives section, but also the Economy, Transport, Design, Green and Blue Infrastructure, and Wimbledon sections.

- A large number of respondents indicated that climate change should be prioritised over growth in the Good Growth and Objectives section, and that Climate Change should be central to the plan. Responses suggested clarifications, re-ordering and re-wording of the Good Growth and Objectives section. Suggest reviewing the Good Growth and Objectives section, and other policy areas to emphasize climate change throughout the Local Plan, ensuring good read-across between the different policy areas, and potentially moving the environment section up-front and centre.
- A number of respondents wanted to see more emphasis on climate change in the Economy and Town Centres chapter.
- A number of respondents highlighted that the plan should emphasize retrofitting existing buildings before promoting new buildings in town centres, and that the need for new office blocks and hotels should be re-assessed in light of Covid.
- A number of respondents highlighted the need to promote a move to car-free development/ low-car economy, within the climate change policies and the rest of the plan.

Colliers Wood

Most of the responses on Colliers Wood emphasised concerns over building heights at Site CW.2 beside the existing Britannia Point, which has been addressed in the main body of this report.

Other responses cross over with other policy areas, particularly infrastructure, town centres and the economy. These included ensuring local infrastructure keeps pace with growth of new homes (Colliers Wood RA), a general desire to see a greater mix of (non-retail) uses

If Colliers Wood is to be designated as a district town centre then Local Plan (or other document) should set out strategy to move away from car-based travel and promote opportunities for residential-led mixed use redevelopment (GLA)

Queries on Merton Abbey Mills and better integrating arts and culture into the heart of Colliers Wood.

All town centres received responses on improving walking and cycling, helping to improve air quality and increasing green cover where possible, also connected to addressing climate change and improving the attractiveness of the neighbourhood. There were mixed responses on vehicular traffic, with some respondents unhappy with the dominance of roads and vehicles and others concerned on loss of car parking and cars.

Economy and Town centres

- Many of the responses citing economic activity, jobs or town centres raised Covid19 and its recovery
 - The Plan must include more on Covid19 recovery
 - Queries on what town centres in particular will look like after Covid19. Support for both protection of retail and greater flexibility for retail uses; Some respondents also wanted to expand town centre and shop front / neighbourhood parade designations, others cited falling retail demand and changing shopping habits from during and before the pandemic, and that the Local Plan should not provide excess retail.

Officers recommendation – Stage 2a of Merton’s Local Plan was drafted from late 2019 to mid 2020 and officers agree that the Plan needs updating to better reflect current knowledge. It is proposed to work with other boroughs, the GLA and consultants to ensure the Plan reflects what is known about potential economic recovery London wide and how this might influence Merton. This is likely to cover a variety of policy matters including transport and urban mobility, economy and town centres, placemaking and urban design.

There are a number of divergent views expressed on economy/ town centres; these are also expressed in each of the area-based policies:

- Views supportive of private vehicle restrictions to make town centres more attractive for walking and cycling, supportive of more infrastructure for walking and cycling, supportive of trees / planting / green cover in town centres (with some specific locations suggested) to make centres more attractive, address climate change and air quality issues, with some specific locations suggested. There were also respondents supportive of increased car parking, a flexible parking pricing, retaining specific sites for car parking, reducing cycling infrastructure
- Other respondents were supportive of protecting shops and increasing shopping designations (such as extending town centre boundaries, and shopping parades), others were supportive of more flexible uses and didn’t think that more commercial development would be necessary post Covid19

Offices

- A few respondents queried whether there will be any future demand for new offices and that the Plan should be amended to only allow commercial development for which there was clearly defined demand (this was particularly from Wimbledon-based respondents and often connected to comments on building heights)

Live/work

- Based on historic trends and analysis of former live/work schemes in Merton, the council's current and emerging Local Plan does not support live/work developments. However a few respondents raised that it is time to review this in line with the changes to how we live and work that have been accelerated by Covid19. Officers recommend that this will be reviewed in light of these responses

Businesses

Site-specific, area-specific or policy specific responses included

- Query whether protection of scattered employment land should require 2.5 years of marketing or 1 year / 1.5 years, given new ways of working and alignment with London Plan (which gives 1 year)
- Alignment with London Plan on protection of industrial land
- Various amendments to shopping areas, including Mitcham town centre boundary, Wimbledon primary shopping area

Health and wellbeing

General support for health and wellbeing policies. On healthcare, NHS Healthy Urban Development Unit and NHS Property Services both responded to the Plan and the CCG's emerging borough health estate strategy is referred to in the Infrastructure Needs Assessment.

Other responses on health matters included matters beyond the local plan (such as current GP enrolment)

Housing

The responses relating to housing fall into two broad categories

- A. Central government and GLA: build more homes (GLA housing target is 918 homes per annum; central government's standard method would be 1,519 new homes per year using government's new standard methodology)
- B. Local responses vary between querying do we need more homes in Merton (particularly post Covid19 / in a climate emergency) and support for more affordable homes

On housing matters, responses supported the highest standards of sustainability in new homes and access to / queries on infrastructure (particularly school places and healthcare) being available to keep pace with new homes. Respondents in general welcomed the Infrastructure Delivery Plan. Responses from the NHS (both NHS Property Services and the Healthy Urban Development Unit

Affordable housing

The GLA's points on general conformity have been raised in the body of the report.

Respondents on housing matters generally supported more affordable housing (even where the respondent doesn't clearly support housebuilding) and a desire to ensure that developers are held to account and build affordable homes on site, including on small sites.

There is general support for Merton's proposal to require contributions from smaller sites towards affordable housing, both from residents and from the GLA.

Infrastructure

There is support for both infrastructure policies with some minor wording changes

Respondents raised queries on whether there is a need for growth in school places arising from housing growth (addressed in Infrastructure Delivery Plan)

NHS Property Services and NHS Healthy Urban Development Unit both responded to the consultation; publication due of NHS Borough Estates Strategy (not available at time of consultation although referenced in the Merton Infrastructure Delivery Plan)

Respondents connected with Joseph Hood primary school (the neighbouring site) made enquiries about the future of Site RP.9 Whatley Avenue; this is addressed in the main body of the report.

Transport for London responded with comments on each of the site allocations (e.g. location of site near strategic road network, comments on the proposed Sutton tramlink route and Crossrail2)

Thames Water provided very detailed feedback on water and wastewater resources for each of the site allocations in the Local Plan and officers will engage with Thames Water on specific queries they have raised on larger sites.

Green / blue infrastructure

The issues raised on open spaces and green infrastructure relate closely to many respondents views that tackling climate change should be front, centre and throughout the Local Plan. Officers are reviewing the plan to ensure a better connection between policy areas

There was considerable support for reducing or restricting the ability to remove trees as part of development and taking a new approach (several were suggested) to calculate tree loss, increasing canopy cover by planting existing trees and managing existing trees particularly

those on the public highway. Respondents asked for links to the council's forthcoming tree strategy and this will be made if this is available before the Local Plan is finalised. A range of different approaches to assessing trees were suggested and officers will consider these with the council's Greenspaces team alongside the new London Plan.

Some respondents called for greater controls over front and back garden paving and development, citing the importance of green cover, flood risk management and addressing climate change

There was general support for policies protecting open space. Some respondents provided specific comments on open space and nature conservation land use boundaries and officers will assess these with site visits over the coming months.

There were specific comments on how to improve existing open spaces, including from sports groups and on designing paths and open spaces as usable for people with mobility impairments.

Mitcham

Extensive and very detailed responses were received from the Mitcham Society and Mitcham Cricket Green Community and Heritage on Mitcham, including requesting that it should be renamed Mitcham Village and protected as such; that the town centre boundary should be extended; requesting designation of more neighbourhood parades; requesting designation of areas for environmental protection; requesting additional transport projects and providing detailed site-specific comments on the proposed Site Allocations. Comments also included that the Plan needed to be better integrated, laid out differently and proof read. Both bodies called for a fourth round of public consultation on the Local Plan to be carried out.

Site-specific comments were received from a number of groups, including the landowners of the proposed site allocations at Tamworth Lane, Benedict's Wharf and the Mitcham Gasworks site. Several objections were received to Tooting and Mitcham Hub specifically on the boundary of Metropolitan Open Land and a response was received from the landowner asking to amend the site boundary

As mentioned below, Hoo Hing Ltd and Elwood Cash and Carry Ltd submitted the site at Hoo Hing and the adjoining site in Mitcham for a proposed site allocation.

The Wandle Valley Forum and other groups called for the outcomes of the "Wandle Vistas" project, an RTPPI award-winning report prepared for the forum and the Wandle Valley Regional Park Trust to be embedded in the Local Plan.

Other detailed comments were received on site-specific designations of open space boundaries, walking and cycling routes, wildlife designations and other matters.

Morden

Respondents on Morden cited general support for the regeneration and improving the public realm. Several respondents cited the existing issues with the traffic dominance, air quality and unattractive buildings as part of their support for the regeneration.

On Morden town centre, there were queries on taller buildings and exactly where they would be located within the regeneration scheme.

Historic England gave very detailed comments on Morden, following a review of both the Local Plan policies and the evidence behind them including the heritage views and townscape analysis. Historic England requested further discussion on some new evidence, including views of Morden from historic locations within and outside Merton.

Although there were relatively few comments specifically on Morden, all town centres received responses on improving walking and cycling, helping to improve air quality and increasing green cover where possible, also connected to addressing climate change and improving the attractiveness of the neighbourhood. There were mixed responses on vehicular traffic, with some respondents unhappy with the dominance of roads and vehicles and others concerned on loss of car parking and cars. On Morden, there were particular responses on how walking and cycling links could be improved through Morden town centre and linked to other routes.

Policies Map, including new sites proposed

Embedded within respondent's feedback is a variety of site-specific amendments proposed to land designations across the borough, some of them very small. These include: Atkinson Morley open space boundaries, Mitcham town centre boundary extension, other areas in Mitcham etc, which will have to be reviewed and the sites visited. Perhaps the largest response on policies map matters is

- Some new sites were proposed for potential allocation, either by a dedicated response or embedded within responses (these cannot be taken forward at this time; the Local Plan has been subject to three public consultations)
 - Site at 57 High Path by 57 High Path Ltd (South Wimbledon)
 - Site at Hoo Hing and adjoining site by Hoo Hing Ltd and Ellbrook Cash and Carry Ltd (Mitcham)
 - Site at Merton's Dementia Hub 67 Whitford Gardens for community led housing (by Mitcham Cricket Green Community and Heritage)
 - Development on part of Prince George's Playing Field (by the London Playing Fields Association)

Raynes Park

Responses on Raynes Park cross over with many other policy areas, particularly placemaking and urban design. Several respondents wanted the Raynes Park policy strengthened on placemaking and urban design matters, both relating to the local town centre and to Wimbledon Chase and Motspur Park and the suburban areas

A number of site-specific responses were received, sometimes concerned with specific planning application details (e.g. Site allocation RP.3, Tesco's Burlington Road, also the subject of a planning appeal during the public consultation and Site allocation RP.6 former LESSA site, off Grand Drive was also submitted for a planning application during the Local Plan public consultation) but infrastructure keeping pace with the number of homes proposed.

Queries were raised about how the Raynes Park policy can cover the distinct areas of Raynes Park local centre, Wimbledon Chase and Motspur Park by Merton Lib Dems

Several respondents raised that the Stage2a draft of the Local Plan seemed to be predicated on Crossrail2 going ahead. As this is not the case, officers propose amending the plan to clarify that neither the need for new homes nor most other issues in Merton's emerging Local Plan are predicated on Crossrail2 happening within the lifetime of the Plan (as set out in para 3.6.13). The draft Local Plan will be amended to be clear that the council will lobby and pursue issues such as step-free access to Raynes Park and Motspur Park stations and a full upgrade of Wimbledon station outwith Crossrail2

A few responses (that didn't otherwise necessarily refer to the Raynes Park policy) were received that sought the move of waste management sites and sites that attracted HGV movements from elsewhere in Merton to beside the A3

South Wimbledon

There remains support for allocating South Wimbledon as a new local centre in the emerging Local Plan. Respondents also specifically supported improvements to shopping frontages and neighbourhood parades

Detailed comments were received from the Battle Area Residents Association and others on the proposed South Wimbledon policy wording and the boundary indicated for the wider South Wimbledon neighbourhood, incorporating Haydon's Road recreation ground.

Transport and urban mobility

Many respondents strongly disagreed with the proposed Willow Lane Access Route, which has been addressed in the main body of the report.

Partly as part of many respondents recommending that climate change be more clearly embedded throughout the Plan, and for support for the 20m minute neighbourhood concept, there were calls for greater emphasis on walking and cycling (dedicated infrastructure, public realm design and connections between existing routes.)

There were mixed views on transport and urban mobility

- Some respondents expressed the view that this section is still too focussed on vehicular travel and should emphasise walking and cycling more.
- A few respondents believed that the plan was “anti-car” and there was a need for more parking spaces to support local businesses, particularly in town centres and neighbourhood parades

Transport for London’s detailed response on all of the site allocations is useful and also helps to clarify their latest position on Sutton TramLink and Crossrail 2. Respondents particularly from the Wimbledon and Raynes Park area stated that they believed that the draft Plan was too dependent on Crossrail2 (this is not intended to be the case, Crossrail2 will not be delivered within this plan period, and officers will review this to make appropriate amendments)

Step free access (the need for more in various locations including Raynes Park, Wimbledon, Haydon’s Road and elsewhere) was raised by several respondents. Officers recommend amending the Plan to ensure that lobbying for improvements to stations, including step-free access funding will continue and clarify that the council will continue to seek investment in Wimbledon station, Raynes Park, Motspur Park outwith Crossrail2

Merton Cycling Campaign provided detailed comments throughout the Local Plan, including on policy, changes, site specific matters and better integration of walking and cycling routes and infrastructure

Wimbledon

Comments on Wimbledon and surrounds ranged across a number of different subjects.

- That climate change should be embedded into the Local Plan (repeated elsewhere)
- Clarify that Wimbledon should be great for people who live and work there, not just commuters or visitors, and that any proposals for the night time economy should consider the residents nearby
- Concerns on building heights in Wimbledon town centre and requests that new building heights be capped or lowered
- Requests for explicit support for neighbourhood planning
- That Covid19 recovery would lead to demand for fewer new buildings – homes, hotels and offices in particular – as more people left London or worked from home permanently
- That there should be explicit support for a concert hall

Detailed site-specific comments were received from many respondents, including landowners such as the All England Lawn Tennis Club and civic societies such as the Wimbledon Society and residents associations such as WHERA

Several respondents on Wimbledon (and Raynes Park) made comments relating to Crossrail2:

- Will it ever be necessary if London changes post Covid
- That parts of the Local Plan appear to be dependent on it
- What is the Plan's status for improvements to Wimbledon station given Crossrail2 is not likely to take place within the Plan's lifetime

There were mixed views on transport and travel – with some respondents seeking far more emphasis on walking, cycling, Low Traffic Neighbourhoods and other respondents saying that the draft Local Plan should provide more car parking and accommodate cars more effectively. There were also concerns expressed from the Wimbledon area about deliveries and particularly HGVs, with proposals made to move the waste management sites in the Weir Road area from Wimbledon to nearer the A3 to reduce lorry movements.