

Merton Local Plan stage 2a Consultation  
Response of Merton Conservatives Group

Merton Conservatives support an ambitious vision for the Merton Local Plan as set out below. This applies to all areas of our Borough, including Wimbledon/South Wimbledon, Mitcham, Morden, Colliers Wood, Motspur Park and Raynes Park.

Quality of design and architecture

The design of new buildings should always be to a high architectural and aesthetic standard that fits the local vernacular and heritage characteristics and complements the area. Design must show respect for (and enhance and restore) Merton's *Heritage* Character and History. Poorly designed, harsh, unattractive buildings adversely impact the borough and should not be approved; instead as a rule, design and architecture must allow developments that 'give back' to our community.

High rise must be limited or avoided in Merton; many of the current proposals for high rise buildings were developed prior to the Covid19 pandemic and therefore the underlying assumptions regarding the need for new office space and residents wishing to live or work in such an environment will need to be revised as the pandemic has led to a substantial drop in the population of London and the demand for office premises. Future large scale buildings would need to fit the current built environment with measures taken to reduce the overall appearance of height, the mass and density should also be carefully considered especially in the town centres.

Significant open, green and amenity spaces must be retained and provided, such that new buildings may not be overbearing on neighbours or on street amenity.

Merton Council should be ambitious and encourage developments to be as sustainable as possible, with regards to insulation and heating of property, and use of renewable energy (such as air/ground-source heat pumps, solar energy and photovoltaics) installed as standard. Developments should achieve high energy efficiency ratings and have minimal CO2 emissions.

Climate change and the pollution crisis

In July 2019 Merton Council declared a climate emergency, since then the council has begun to work on an action plan in order for the borough to be carbon neutral by 2050. Whilst much of the work is necessary and focused on the future, Merton Council has failed to address the pollution crisis within the borough and has yet to take meaningful action to reduce pollution across the borough. There are many examples of councils across London taking the lead when it comes to reducing pollution, however Merton Council has not been one of them. The council has failed to increase tree planting, and has felled many trees unnecessarily over the past few years. The council has also opposed and failed to deliver technology based solutions such as green walls and city trees which could have had a meaningful reduction on pollution. Instead the council has pursued its anti-car agenda which has not been

shown to reduce pollution or emission levels but is rather seen as a means of further raising revenues from Wimbledon and Raynes Park. Merton Council must urgently improve its efforts to reduce pollution and move away from its anti-car agenda that has been proven to be a failure. The Council imposed the diesel tax on Wimbledon and Raynes Park – it would be positive to see funds raised invested in the transition to electric vehicle infrastructure.

### Merton Council's anti-car agenda

The Local Plan is littered with reference to reducing vehicle ownership and use across the borough. Whilst active travel options should be encouraged and have our support, it is clear that an anti-car agenda is not only unworkable, but is deeply unfair as it targets a minority of residents, primarily in Wimbledon and Raynes Park. As council officers acknowledge, the council's options are limited to trying to price motorists out of car use. However, as we have seen from the previous parking charges tax hike this policy is deeply unfair and has not resulted in any noticeable improvement in air quality. It does nothing to help address air quality issues in the east of the Borough. Merton Council should drop its anti-car agenda and focus on technology based solutions that clear the air and sensible effective measures such as low emission bus zones supported by proper active monitoring rather than penalising a minority of residents on the back of out of date and flawed studies that have been shown to be inadequate.

### 20 minute city

The '20 minute' city concept has been tried in some cities with limited success. In principle the idea of accessing necessary local services and recreational space within a 20 minute walk or public transport journey is an interesting concept. However, it would be misguided to become overly attached to or obsessed with an idea when there have not been any studies into how this would operate in Merton.

As no such studies have occurred, it should be considered as an aspiration and not a formal policy goal or rule of planning. The council is also not in a position to deliver the new infrastructure that such projects require. Due to the current Mayor of London's poor record and financial mismanagement in city hall, it should also be recognised that it is likely to be some years before any funds to develop '20 minute cities' are available. The council must avoid the concept of the '20 minute city' being used to reduce access to private transport and therefore limiting personal freedom in the process.

### Housing: Provision & Design of Affordable Housing:

The Borough must work to ambitious targets for the provision of new Affordable Housing. The requirement for excellence in design and the retention and/or creation of quality green and/or community space must also extend to all new housing developments and Affordable Homes (both intermediate *and* social costed affordable housing); such developments must allow for the retention or development of

sufficient open / amenity / green spaces to ensure architectural design that *gives back* to and encourages community. For example, new pocket parks and parklets need to be created within new developments. Developers must provide Financial Development Appraisals to confirm and justify the quantity of Affordable Units that will be provided.

We note the issues connected to providing affordable housing across the borough, in particular the lack of space. However the task of providing affordable housing has been made harder since the council completed a sudden U-turn before Christmas and abruptly closed down its housing company despite having spent millions of pounds and years of work on establishing it. Merantun had the potential to increase the supply of affordable housing, however, due to the incompetence of the Labour administration this now will not happen, and taxpayers have been left with a defunct company having invested some £2,000,000 of shareholder funds and leaving taxpayers with bill for the administration's incompetence.

#### London plan opportunity area

The London plan opportunity area has been developed on the back of the proposed Crossrail 2 coming through Wimbledon. The opportunity area of Wimbledon/ Colliers Wood/ South Wimbledon was to see the creation of 5,000 homes and 6,000 jobs. This will likely need to be revised as the pandemic has shifted working patterns towards home working, and there has been an exodus of people from the capital due to the pandemic.

#### Improvement of Public Realm: encouraging open space and the fostering of both Community and Character:

Sufficient and properly landscaped (and greened) *open amenity space* must be prioritised to foster community and allow engagement and cohesion. Opportunities must be found for pedestrian zones and/or *central squares* in town and district centres and retail areas, which maximise traffic-free environments where space permits and which improve community health and wellbeing opportunities. The development of Community must also enhance character.

The creation of a community environment that is dominated by an 'office focused' character or 'office-based' town centre must be restricted and avoided. Opportunities must be provided for the *arts and culture*, including for open air performances within communities, with opportunity for more regular (weekly / daily) engagement and usage, and possible quality street market usage. To the extent office provision is increased in town centres, it must be positively balanced with community amenity for residents and all visitors, and with the facilitation of regular arts and culture events. We therefore wish to see site W15 Morrison's car park listed as a potential space for a concert hall/ music space.

#### Public Realm Improvement: our three main town centres:

The quality of design and the provision of properly landscaped amenity space in the new centres proposed for each of Wimbledon, Morden and Mitcham must all be of the highest quality, with ambitious post-pandemic public realm regeneration plans supported by strong levels of urban greening and associated green infrastructure. The “Merton feel” of quality, heritage architecture and a green and leafy borough should be prioritised and extended through South Wimbledon, Mitcham, Morden and Colliers Wood. Should Crossrail 2 proceed, it should be used as an *opportunity*, in order to deliver a better, superior and more attractive, sustainable and greener town centre in Wimbledon.

It should also be recognised that town centres and the high street need to offer much more of an “experience” for residents and visitors; ambitious strategic plans are required, incorporating measures and design that improve opportunities for amenity and health and wellbeing. Opportunities and infrastructure for both mainstream and fringe arts, culture, theatre and film leisure need to be supported and developed within town centres and also within local libraries.

#### Environment: Air Quality, Trees & Urban Greening:

The improvement of air quality (reducing NO<sub>2</sub> and PM<sub>10</sub>/PM<sub>2.5</sub>) must be a priority in every commercial or infrastructure based planning approval, with neutral impact developments only being allowed by exception and after ensuring strong mitigation and/or greening measures. Rigorous monitoring in pertinent locations must be carried out in all areas of poor air quality with the *regular* publication of relevant data, clearly set out for ease of quick reference by residents and for proper reliable reference in planning decisions. For commercial, infrastructure based and residential developments, urban greening, plantings and an *increase in tree cover* must be ensured, with the use also of planters, rain gardens, living walls and other green infrastructure, as well as the protection and restoration of pocket parks. Any new school site proposed must be fully consulted on with the public and residents and any decision must take into consideration the views of all groups on the council and of relevant residents’ associations. Further new school sites should not be approved at busy roads suffering poor air quality. Waste operation sites with high levels of HGVs should gradually transition to more suitable locations such as the A3.

We should also aspire to create more tree-lined streets and reverse the level of tree-felling that has occurred over recent times. New planning applications which propose to remove trees should be stipulated by condition to replace with equivalent or greater number of same aged-trees either on-site or payment in-lieu to be spent by the council on trees elsewhere.

Opportunities for new parklets and pocket parks must be taken.

#### Environment: Leisure, Parks & Well-being:

The Borough’s leisure facilities and parks must remain a real priority in terms of protecting land allocation and ensuring the continuing quality and levels of diverse plant and tree cover, and also the restoration of relevant heritage characteristics and available heritage listings for our green spaces, whose general quality must be prioritised and retained. Planning must allow for such facilities to be provided for all

ages within our population, with special focus given to the leisure, health and well-being of our Borough's young persons of school age and pre-school groups, and additional focus for Merton's ageing population and senior citizens to allow healthy outdoor activities. Merton Council should seek to protect and enhance garden space across the borough to maintain and enhance the biodiversity of local wildlife, the aesthetic look and feel of residential roads and help with sustainable urban drainage. Protection of hedgerows, garden trees and street-trees should be a requirement of planning conditions for development and removal only allowed if offset by other means. Building on protected metropolitan open-land or green-belt should be blocked.

### The Wandle Trail:

The Local Plan 2020 offers an opportunity to connect the Wandle Trail across the River Wandle from Haslemere Avenue into Earlsfield. Money to support a bridge link across the Wandle into Wandsworth and Earlsfield could be further provided from the potential development of site Wi7 at the Rufus Business Centre. In addition to site Wi7 Merton Council has already agreed to develop the Haslemere Industrial Estate which was granted planning permission in June 2017. The connection of the banks of the River Wandle will allow a much needed additional crossing which will improve connectivity into Wandsworth and the wider area, as well as improving safety for local cyclists and pedestrians. We strongly urge Merton Council to explore all available funding streams for this project including money from TfL. Closing the "missing link" between Merton and Wandsworth (for cyclists and pedestrians to pass under the railway bridge alongside Haslemere Industrial Estate) must be prioritised and successfully managed to prompt completion. The Wandle Trail needs to be preserved and promoted to be made more legible with much improved access points.

### Infrastructure – climate change & sustainable travel:

In the interests of the Borough doing what it can to lead on mitigating climate change impact and encouraging well-being, ambitious levels and forms of sustainable travel must be maximised with priority planning given to the advent of Electric Vehicles (EV's) (including the moving of all Borough bus and taxi provision to EV / renewable energy based provision, as well as the quick adoption of low emission bus routes); significant and attractive, innovative, and even concealed parking capacity for EV's must be provided in town centres, with supporting charging infrastructure to be developed across the Borough and even consideration in the mid to long term to provide infrastructure in support of autonomous vehicles. The Council imposed the diesel tax on residents in Wimbledon and Raynes Park – these funds could be reinvested in EV infrastructure to support transition.

Segregated strategic cycling routes (for example that link our three main town centres) as well as quiet paths must be developed along with the promotion of pedestrian walking routes. Existing cycle routes should also be made more visible and legible to our residents, and schemes for electric bike hire should be encouraged. The recent dependency on potentially dangerous 'bollard' schemes that

create risks and compromise amenity should be reviewed. Safe road zones around schools must be prioritised, and 20mph speed limit zones should generally be deployed in all residential roads (subject to support of the road's residents), together with anti-engine idling schemes on all busy polluted roads. Easy to use / quick convenient Hopper mini-E-bus services should be considered, e.g. to connect Wimbledon town centre to Wimbledon Village. To encourage modal shift to cycling in the borough the council, business and any new developments should provide secure and covered bicycle storage units and bicycle stands.

The current pressures on residential parking may be mitigated with the development of CPZ's across the wider Borough and specifically to encourage residents to switch (in time) any 2<sup>nd</sup> vehicles to cars which are either smaller, or which are EV's. The council should set out ambitious targets to work to delivery of a high (majority) percentage of EV's in the Borough within the term of the new Local Plan. CPZ zones should allow parking for residents, but must also support local business and ensure sufficient provision for visitors to retail units in our town, district and local centres. With the future predicted rise in electric vehicles, it should be mandated that parking bays provided as part of planning applications shall have EV charging points installed or as a minimum wired up to allow future EV charge point installation.

#### Sustainable Waste Management:

The Authority must ensure the highest standards of sustainable waste and also waste-to-energy management, by working to ensure the proper categorization of waste (including demolition wastes), regularly publishing suitable data to allow for maximum / full levels of recycling and/or conversion to energy.

Best practices must be introduced to ensure street lighting is of the highest standard in terms of both energy usage and light pollution impact; the Authority must also work to ensure replacements and upgrades to adopt up-to-date solar/PV technology to promote sustainability and the reduction of energy consumption. As stated above, the Council should be extremely cautious about permitting new developments that might lead to greater number of HGVs, in particular on residential roads, and waste sites ought to gradually transition to more suitable areas such as on the A3.

#### Infrastructure: future office development & the digital economy:

The Borough must ensure that it does not over-provide on office space capacity and similarly does not provide mass low-tech office space to the detriment of the character of Borough or any town centre; the development of new office space must only come after establishment of a clear business case and proven level of demand, which now has to be revisited post-pandemic; every consideration must be given to encouraging well designed and high-tech office space with supporting digital infrastructure to allow skilled and creative workspaces to develop. As stated above in the context of ensuring quality town centres, any increase in office space capacity must be positively balanced to ensure community amenity is prioritised for residents and all visitors, alongside the facilitation of arts and culture. Merton Council should

ensure that all new developments have fast and up-to-date broadband as standard to meet the needs of future residents and business.

### Support of Retail Economy:

Priority must be given to the development and enhancement of quality retail locations, for example by providing exceptional first class designs for 'lane-ways' for small retail, possible market use and also quality bars/restaurants to develop community centres of the highest quality and character; local shops should also be supported by clear '30 minute stop-and-shop' parking on available spaces; planning must allow for a positive balance of retail classes and quality / authentic restaurant / bar offerings to create vibrant and safe environments for use by all. The future of our high streets must be reconsidered in the context of the pandemic but also have regard to the findings of the current focus task group. In general, it needs to be recognised that our high streets will need regeneration to ensure that they become better designed, attractive locations for residents to pass time and leisure in and for the "experience", as opposed to providing mere functionality for retail offerings and purchases. Art, culture, theatre, music and leisure opportunities and supporting infrastructure need to be developed. A proper allocation of parking spaces as well as innovative well designed attractive parking infrastructure must also be provided for visitors to town, district and local retail centres.

### Funding:

Contributions such as s106 and CIL monies should be raised and allocated to support all of the above. The Council must ensure it monitors and applies for all available grants and CIL monies from Mayor of London, TfL and the Government in support of all of the above.

### Neighbourhoods

#### Colliers Wood

The Council need to ensure that Colliers Wood is not spoiled by further high rise buildings. The Britannia Point tower should be the maximum height limit in this area, and any proposed development should be stepped down in height. More greenery needs to be introduced into the area to break down the massing and greyness of the buildings and to give a greener feel in-line with elsewhere in Merton.

#### Mitcham Village

In general, an extremely ambitious regeneration project is required to give Mitcham a major lift after decades of neglect from Merton Council and under Siobhain McDonagh who together have chosen not to focus on better planning decision but

instead focused on other matters such as blocking the new hospital for residents. Mitcham should be renamed as *Mitcham Village* and new areas of green space must be prioritised in the area of Fair Green. The council's development of a market has failed and the provision of an attractive street market needs to be revisited. The council's endless poor planning decisions in and around the centre of Mitcham (resulting in unattractive, harsh cube structures out of keeping with the attractive heritage architecture in the locality represented by the likes of the Three Kings and Kings Arms) have unfortunately held back the potential of Mitcham and discouraged investment and its success and regeneration.

Mitcham Village has enormous potential to develop as a new attractive community: Fair Green must be re-greened and Labour's dissection of Mitcham's centre with a bus lane and depot has proven an amenity disaster for the centre of Mitcham; Fair Green should be connected all the way through to Cricket Green with an attractive Avenue in the form of a green walking route that passes the Greens, ponds and Canons. The Canons gardens should be prioritised to rival Cannizaro in Wimbledon Village. The area from Fair Green to Cricket Green should be protected as a Historic England Conservation Area.

Majestic Way offers great potential as for an attractive redesigned arcade of small holdings; St Marks Car Park should be considered for a vibrant pop-ups location (Mitcham Levels) to rival the successful bustling Peckham Levels.

We support local residents in their opposition to proposal TN17 of Policy T6.9 and ask for it to be removed from the Local Plan.

The Benedict Wharf site (if it hasn't already been developed) should be limited to gentle density increase and not massive overdeveloped blocks.

## Morden

Morden requires a properly managed ambitious redevelopment to lift the centre in its entirety. Labour's dithering and indecision has led to Morden losing some £50-75m of redevelopment monies which has proven disastrous for the community and centre of Morden. A proper plan must be established; grant, housing association and private sector funding must be obtained and a regeneration implemented.

## Raynes Park and Motspur Park(incl West Barnes)

RP2 these buildings needs space behind the buildings, away from Burlington Road, offering space for sitting outside cafes, delivering a chance to dwell and meet, not just shop and leave.

The council's view on RP3 is disastrous and proves they don't mean what they say about quality and beauty. Their backing of the 450 home monolithic block of flats gave the wrong message to developers, who are now hell-bent on erecting a



depressing concrete jungle that will be hated for 50 years before it is demolished, with all residents saying, 'who on earth allowed that monstrosity to ruin our lives?'

RP4 needs genuinely developing. Connecting The Carter's Estate to this site will open it up. Moving the West Wimbledon School, to RP4, offering more space for pupils, especially outdoor will be a win/win.

RP5 and RP6 must be fully protected as green spaces.

The Council must re-evaluate RP7. It provides hundreds of blue-collar jobs, which need protecting. A mix used site is desirable. It must, however, have a pedestrian/cycle connection between West Barnes Lane and Kingston Road top open up the area. This site can make a fundamental difference to the town centre, once connected. The planning permission has run out, so we have a new opportunity.

RP9 we support the use of this site as a special needs education centre. If deemed as surplus to education requirements then the council needs to offer some of the land to Joseph Hood School to provide a better school landscape. The building should be protected.

In addition, we should like 'Policy N3.4 Raynes Park' amended as follows:

1. Page 4 point h currently reads "Optimise land use by providing new homes above retail outlets and other business premises". To this, the following clause should be added "Such flatted homes should be provided with a minimum of 10m<sup>2</sup> of private outdoor space per unit." Justification: To maintain the quality of the housing stock in Raynes Park.

2. Page 4 point k currently reads "Requiring development to respect local character and amenity in surrounding residential neighbourhoods". To this, the following clause should be added "No new build or building extension in the area should result in a total building height greater than 25 metres, including roof top plant and machinery".

Justification: This clarifies the requirement to retain Raynes Park's character of low rise dwellings.

Re Site RP7 Rainbow Industrial Estate, the site use allocation should include "Short-term car park". Justification: Additional carparking is necessary to help support local shops in Kingston Road, Coombe Lane, Durham Road and Worple Road, and the growing number of premises (NHS & private) providing medical services to residents in the wider area.

South Wimbledon

The South Wimbledon crossroads and station is a busy congested crossroads. Proposals to green the area at and around the Tube station, for example with a

green living wall, should be given favourable consideration. Merton High Street should be developed as revitalised and vibrant parade of shops.

## Wimbledon

Para 3.6.6 says in the Wimbledon section of the plan says "The local topography and quality townscape mean that Wimbledon is not suitable for high rise towers therefore to accommodate growth in keeping with the area, sites within Wimbledon town centre need to become denser and accept a moderate increase in heights".

We think that it is true that high rise towers cannot be built, and we would add that Wimbledon Town Centre cannot be made much more dense compared with now, and we suggest that maximum heights be set more in-line with the wishes of local residents. In our opinion that is approximately 8 storeys/25m on around the St Georges road/train station area and 6 storeys along the Broadway. Then gently stepping down into adjoining residential roads.

## AELTC Golf Course

AELTC's plans for the development of the golf course need to be fully scrutinised to ensure that public vistas to and around the lake are retained and improved, along with the local habitat and ecology. As much as possible of AELTC's golf course (Holes 1-9) should be retained as open green space and parkland.

Site Wi4? Does not seem to appear on the map or within the documents. Is this an error or omission?

## Rufus Business Centre site Wi7

This site need to be further recognised as providing the only suitable access point for any redevelopment of the adjacent Wellington Works. Various attempts have been made to apply for residential consent at the adjacent Wellington Works but it has been hampered by inadequate and dangerous access from Dawlish Avenue and Wellington Road. The Rufus site Wi7 needs to be considered equally as the access solution to any form of residential development at Wellington Works (absent an extension of Gresham Way).

## Wi12 Volante & Summerstown

This is such a tight congested and polluted space that every priority must be given to development that returns a substantial provision of open and green space with any construction to be set back a distance from the road as the pavements are dangerous and far too narrow. A through cycling route should also be considered at this location. Also a new pocket park should be required at this congested location as a condition of any development.

Site Wi9/10/13 - we accept the suggested uses, though we are concerned by the council allowing and hinting at ever taller buildings. Residents have said they want gentle density with nothing higher than 6/7 storeys. In line with our previous position

we accept that some gentle increase could be permitted, up to a maximum of 8 storeys or 25m.

Site Wi14 - not explicitly broken down or covered in the report - has this been omitted it or just lumped in with section on Wi13? - We suggest council include in the final plan.

Site Wi16 (centre court) says it is in Hillside. This site is in Trinity ward. Residents do not want to see high-rise buildings, therefore we suggest that tall buildings are limited to 10 storeys, ideally lower. We support the idea of another bridge to link to Alexandra road, and another better entrance into the station.