

# LBM43 Merton's post hearings consultation – summary of responses received.

May 2024

## 1. Background

1.1. In line with the Planning Inspectors' post hearings cover note dated January 2024 ([Document ref INSP25](#)) the post hearings consultation on Merton's Local Plan took place for seven weeks between 02 February and 22 March 2024. The consultation documents were available via the [London Borough of Merton Local Plan examination website](#) and included:

- LBM29 Schedule of Main Modifications dated January 2024
- LBM30 Schedule of Additional Modifications dated January 2024
- LBM31 – Merton's Local Plan incorporating proposed modifications dated February 2024
- LBM31 – accessible version of Merton's Local Plan incorporating proposed modifications dated February 2024
- LBM32 Sustainability appraisal of Merton's Local Plan dated January 2024
- LBM33 Habitats Regulations Assessment of Merton's Local Plan dated January 2024
- LBM34 Equalities Impact Assessment of Merton's Local Plan dated January 2024
- LBM35 Health Impact Assessment of Merton's Local Plan dated January 2024
- LBM36 Schedule of Modifications to the Policies Map dated January 2024

1.2. More than 1,000 emails and letters were set out to everyone who had subscribed to Merton's Local Plan consultation database, including everyone who had participated in the Stage 3 (Regulation 19) Local Plan pre submission publication and the public hearings in June and October 2022. Follow up correspondence was sent to emails that bounced back and an email reminder was set on 7<sup>th</sup> March 2024.

1.3. 120 representations were received raising over 550 points on Merton's Local Plan post hearings consultation. All representations are available online via [Merton's Local Plan post hearings consultation website](#), with personal details redacted.

1.4. Many representations did not refer to a specific Main Modification reference. Where it was clear and obvious which MM the representor was referring to, council officers added

## 2. Summary of representations received.

2.1. Council officers prepared a schedule of representations to ensure all the representations received had been addressed. Table 1 below summarises the number of representors who referred to each representation.

<b>MM reference</b>	<b>Number of representors</b>
No MM referenced	58
MM33, MM39, MM44 (site CW2, Land South of Britannia Point)	37 each
MM62 (Site Mi16 Mitcham Gasworks)	21
MM112 (policy N8.1 Wimbledon Park)	9
MM116 (site allocation Wi3: All England Lawn Tennis Club, Church Road)	5
MM213 (policy D12.3 ensuring high quality design in all developments)	4
MM350 (Chapter 17: Monitoring Framework)	4
MM222 (policy D12.3 ensuring high quality design in all developments)	3
MM239 (policy D12.6 tall buildings)	3
MM298 (policy O15.6 Wandle Valley Regional Park)	3
MM330 (policy T16.2 prioritising active travel choices)	3
MM39 (all site allocations – infrastructure requirements)	3
MM44 (multiple site allocations – Thames Water developer services)	3
AM281	2
MM343 (policy T16.4 parking and low emission vehicles)	2
MM10 (spatial vision)	2
MM108 (policy N9.1 Wimbledon)	2
MM150 (policy H11.1 affordable housing)	2
MM180 (policy H11.5 housing for students)	2
MM202 (policy D12.2 urban design)	2
MM255 (D12.6 tall buildings)	2
MM287 (policy TC13.9 arts, culture and tourism)	2
MM323 (P15.10 air quality, pollution and land stability)	2
MM328 (policy T16.2 prioritising active travel choices)	2
MM33 (policy N3.1 Colliers Wood)	2
MM338 (policy T16.3 managing the transport impacts of development)	2
MM35 (reference to infrastructure policies across multiple points)	2
MM353 (policy T16.4 parking and low emission vehicles)	2
MM49 (site allocation CW3)	2
MM93 (all site allocation infrastructure requirements)	2
MM95 Site allocation R2	2
AM158	1
AM166	1
AM167	1
MM348	1
MM106	1
MM107	1
MM108	1
MM109	1
MM110	1
MM111	1

MM reference	Number of representors
MM113	1
MM114	1
MM115	1
MM118	1
MM120	1
MM128	1
MM139	1
MM145	1
MM146	1
MM15	1
MM151	1
MM153	1
MM155	1
MM156	1
MM159	1
MM173	1
MM183	1
MM191	1
MM197	1
MM198	1
MM199	1
MM2	1
MM204	1
MM209	1
MM212	1
MM225	1
MM23	1
MM236	1
MM249	1
MM251	1
MM263	1
MM266	1
MM268	1
MM288	1
MM29	1
MM291	1
MM293	1
MM295	1
MM299	1
MM315	1

<b>MM reference</b>	<b>Number of representors</b>
MM325	1
MM327	1
MM329	1
MM331	1
MM332	1
MM333	1
MM335	1
MM336	1
MM337	1
MM339	1
MM340	1
MM342	1
MM38	1
MM40	1
MM42	1
MM43	1
MM47	1
MM52	1
MM539	1
MM54	1
MM56	1
MM59	1
MM6	1
MM60	1
MM61	1
MM62	1
MM67	1
MM7	1
MM73	1
MM74	1
MM75	1
MM84	1
MM86	1
MM9	1
MM96	1
MM99	1
MM-Green Corridor Map-07	1

2.2. The numerical summary of number of representors who commented on a particular Main Modification only gives a partial picture of the depth and breadth of the responses received

to Merton's Local Plan post hearings consultation. Some representors focussed on one Main Modification and wrote extensive and detailed responses to multiple parts of the modification (for example about site allocation CW2, land south of Britannia Point, policy N8.1 Wimbledon Park or site allocation M16 Mitcham Gasworks). Other representations covered detailed matters across the entire plan. Most representors took the time to prepare very detailed responses which should be read in full and are better represented in the Schedule of Representations which addresses every point raised.

#### **Site allocation CW2 – land south of Britannia Point (MM33, 39 and 42)**

- 2.3. The highest number of representations received related to site allocation CW2, land south of Britannia Point. 37 of the 120 representations received referenced MM33, MM39 and MM44 (or variations of them) and 34 of these representations wanted the Main Modifications removed and the phrase retained that "*Britannia Point should remain the pinnacle building in the town centre in terms of height.*"
- 2.4. Representations requesting the removal of MM33, MM39 and MM44 (or variations of them) were received from individuals and from multiple organisations including Colliers Wood Residents Association, Colliers Wood ward councillors, the Battles Area Residents Association, Singlegate primary school, the Cabinet Member for Housing and Planning (referencing the council's Development and Planning Applications Committee's support for the same) Merton Conservatives, Liberal Democrats and Merton Friends of the Earth. The Colliers Wood ward councillors' response referenced a petition of over 800 signatures.
- 2.5. Two supportive responses for these Main Modifications were received: from the landowner Criterion Capital and from an individual. One response was neutral.

#### **Site allocation Mi16 – Mitcham Gasworks (MM62)**

- 2.6. 21 representations were received that referenced site allocation Mi16 Mitcham Gasworks. Of those 21 representations, most were not supportive of MM62 which proposes modifications to the indicative range of homes, the appropriate building heights for the site allocation and references the National Model Design Code and National Design Guide. Representations to remove or modify MM62 were received from individuals and groups including Mitcham Society, Mitcham Cricket Green Community and Heritage. Some representations from local residents referenced a previous petition. Many representations were extensive and very detailed, addressing multiple points.

#### **New policy N8.1 Wimbledon Park (MM112)**

- 2.7. Nine representations referenced the new Wimbledon Park policy N8.1 (MM112), including from Friends of Wimbledon Park, Merton Conservatives, Merton Liberal Democrats, Residents Association of West Wimbledon, Wimbledon Park Residents Association, the Wimbledon Society, the All England Lawn Tennis Club and The Gardens Trust. Many of these representations were very extensive.
- 2.8. Broadly the Friends of Wimbledon Park, the Residents Association of West Wimbledon, Merton Liberal Democrats and The Gardens Trust proposed some modifications that they

considered would make the policy sound. Other representors (Wimbledon Park Residents Association, London Gardens Trust) proposed the deletion of the policy.

#### **Site allocation Wi3 All England Lawn Tennis Club, Church Road (MM116)**

- 2.9. Five representations referenced Site allocation Wi3, including the All England Lawn Tennis Club, Parkside Residents Association, Wimbledon Society and the Residents Association of West Wimbledon. Again, some of these representations are extensive and raised a range of different matters.

#### **Policy D12.3 Design considerations in all developments (MM213 and MM214)**

- 2.10. Four representations were received for MM213 relating to policy D12.3 Design considerations in all developments". MM213 and MM214 propose to replace the submitted Plan's language of "*providing appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy to both proposed and adjoining buildings and gardens*" with language that reflects the NPPF: "*acceptable light, privacy and outlook would be available to existing and future occupants of the proposed development and its surroundings*". Representors including the Wimbledon Society, Merton Park Ward Residents Association and the Residents Association of West Wimbledon put forward removing this MM and reverting to the Local Plan's original language.

#### **Chapter 17 Monitoring**

- 2.11. Four representors, the Environment Agency, Merton Liberal Democrats, Sport England and the Wimbledon Society, had a variety of detailed comments on MM350, which is the entire of Chapter 17: Monitoring.

#### **Representations raised on matters that were not MMs**

- 2.12. Many representations proposed amendments to the Local Plan that did not relate to Main Modifications and so don't have a MM reference and aren't included in the table above. These are found on matters throughout the Plan and some key points are set out below.
- 2.13. Several representors, including LoveWimbledon BID, Merton Liberal Democrats, Parkside Residents Association, Roxborough Asset Management, the Wimbledon Society and some individuals recommended their improvements to policy N9.1 Wimbledon, particularly around reducing tall buildings and improving the public realm in Wimbledon town centre. Associated with this are representations regarding the strategic height diagram for Wimbledon town centre in policy D12.6 *tall buildings*, stating that the indicative height diagram boundaries could be drawn more clearly to avoid straying outside the town centre boundary and creating ambiguity as to where policy D12.6 *tall buildings* would apply in practice.
- 2.14. Six representors submitted nearly identical representations requesting the removal of part of policy H11.1 Housing Choice which proposes requiring cash in lieu contributions towards affordable housing from small sites, subject to viability and other matters.

#### **Responses from statutory consultees**

- 2.15. The Greater London Authority responded with concerns about housing delivery over the Plan period and about the approach to tall buildings and reference to the National Model Design

Guide in policy. The Mayor's representation provides a table that comments on multiple Main Modifications on housing delivery and tall buildings.

- 2.16. Transport for London's Spatial Planning Team commented in detail on multiple main modifications, stating their support for most of the modifications they refer to.
- 2.17. The Environment Agency's representation states their support for the modifications they refer to in their letter. They recommend amending MM293 to help identify local habitats of strategic significance until London's Local Nature Recovery Strategy is published.
- 2.18. The Historic England Archaeology Advisor states their support for the documents.
- 2.19. The Gardens Trust representation focuses in detail on MM112 (Policy N8.1 Wimbledon Park). The Gardens Trust is supportive in principle of policy N8.1 and recommends specific wording changes throughout the policy.
- 2.20. The London Parks and Gardens Planning and Conservation Working Group describes itself as being affiliated to The Gardens Trust and making observations on Grade II listed sites on behalf of The Gardens Trust . Their representation proposes deleting policy N8.1 Wimbledon Park).