

GREATERLONDONAUTHORITY
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Our ref: LDD04/01
Date: 23 March 2012

For the attention of: Tara Butler
Sustainable Communities,
London Borough of Merton,
Merton Civic Centre,
London Road,
Morden, SM4 5DX.

Dear Tara,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2004 (as amended).**

Re: Merton Draft Sites and Policies Development Plan Document

Thank you for your letter 09 February 2012 consulting the Mayor of London on the issues and options stage of Merton Council's DPD document. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond. The attached Appendix A will constitute his representations to the consultation.

The Mayor will issue his formal opinion on general conformity when requested at the pre-submission stage. However, I hope that the policy concerns I have raised at the current stage can be resolved before then, through further informal discussions with Council officers.

Yours sincerely



Sir Edward Lister
Deputy Mayor and Chief of staff

cc Richard Tracey, London Assembly Constituency Member
Jenny Jones, Chair of London Assembly Planning and Housing Committee
Ian McNally & John Pierce, DCLG
Colin Lovell, TFL
Javiera Maturana, LDA

Merton Council Draft Sites and Policies Development Plan Document and Draft Proposals Map

January 2012

Representations from the Mayor of London 23 March 2012

Consultation period: ends 23 March 2012

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
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Merton Council Draft sites and Policies Development Plan Document and Draft Proposals Map Centres, retail and other town centre type uses

1.	DM R1: Location and scale of development in Merton's town centres	<p>2.15 Town centres</p> <p>4.7 Retail and town centre development</p> <p>4.8 Supporting a successful and diverse retail sector</p>	<p>GLA are concerned over the open ended support for proposals in Wimbledon, Mitcham Mordan and Colliers Wood defined as generally over 1,000 sq.m and the potential impact on the strategic retail hierarchy.</p> <p>London Plan Table A2.1 town centre classification and broad directions identifies Wimbledon (as a major centre) with Mitcham and Morden identified as district centres. Colliers Wood is not identified as a strategic town centre but is identified with South Wimbledon as Intensification Area in table A1.2, but there is concern specifically over it being defined as a town centre with an open ended scale of development permitted which could be mostly further retail warehouse units.</p> <p>Following discussion with the borough it is recommended that a cross reference be included to the policy a) i. to the Core Strategy this will help clarify the approach to the level of proposed development in Colliers Wood and when this will be acceptable. This will deal with concerns expressed by the GLA.</p>
2.	DM R2: Out of centre commercial Development	<p>2.15 Town centres</p> <p>4.7 Retail and town centre development</p> <p>4.8 Supporting a successful and diverse retail sector</p> <p>4.9 Small shops</p>	<p>GLA are supportive of this policy as it is a proactive approach to managing capacity and fits with London plan policy 4.7 to firmly resist inappropriate out of centre development.</p> <p>The alternative option of using a radius of 10 minutes walking distance (800m) than 5 minutes (400m) to identify areas of deficiency in local convenience shopping should not be adopted as this would conflict with London Plan policy 4.8 and policy 7.1 lifetime neighbourhoods.</p>
3.	DM R3: Protecting corner/ local shops	<p>7.1 lifetime neighbourhoods</p> <p>4.8 Supporting a successful and diverse retail sector</p>	<p>GLA is supportive of this policy but the borough should consider a response to London Plan policy 4.9. <i>In considering proposals for large retail developments, the</i></p>

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		4.9 Small shops	<i>Mayor will, and Boroughs should, consider imposing conditions or seeking contributions through planning obligations where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or independent retailers and service outlets and/or to strengthen and promote the retail offer, attractiveness and competitiveness of centres.</i>
4.	DM R4: Protection of shopping facilities within designated shopping frontages	2.15 Town centres 4.7 Retail and town centre development 4.8 Supporting a successful and diverse retail sector	The alternative option should not be adopted as this would conflict London Plan policy 2.15, 4.8 and 4.7. CLA are supportive of this policy as it is a proactive strategic approach to enhancing the vitality of town and local centres at the local level and fits with London plan policy 4.7
5.	DM R5: Food and drink / leisure and entertainment uses	2.15 Town centres 4.7 Retail and town centre development	No comment.
6.	DM R6: Culture, arts and tourism development	4.8 Supporting a successful and diverse retail sector	CLA are supportive of this policy as a local response to a strategic aim under London Plan.
7.	DM R7: Markets	2.15 Town centres 4.7 Retail and town centre development	CLA are supportive of this policy as a local response to a strategic aim of the London Plan to support the range of London's markets, including street, farmers' and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres.

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Housing			
8.	DM H1 Supported care housing and care homes	4.8 Supporting a successful and diverse retail sector 3.8 Housing choice 3.9 Mixed and balanced communities	GLA are supportive of this policy as a local response to a strategic aim under London Plan policy 3.8 under part (e) account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners. Further, the same policy part (g) states that other supported housing needs are identified authoritatively and coordinated action is taken to address them.
9.	DM H2 Housing mix	3.8 Housing choice 3.9 Mixed and balanced communities 3.11 Affordable housing targets 3.13 Affordable housing thresholds	GLA are supportive of this policy as a local response to a strategic aim under London Plan policy 3.8, 3.9, 3.10 and 3.11.
10.	Omission		There is a need for a policy referencing the new affordable rent product relating to the minor alteration to London Plan and GLA Draft Housing SPG
11.	Omission		Need for student housing policy and accommodation of such developments within the borough as this is a strategic priority.
Support for Infrastructure			
12.	DM C1 Community facilities	3.15 Co-ordination of housing	GLA are supportive of the general policy approach rather than separate policy for

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13.	DM C2 Education	development and investment 3.16 Protection and enhancement of social infrastructure 3.18 Education facilities	each type of community facility. As stated the Borough Core Strategy policy CS11 covers guidance on a wide range of facilities as defined by the London Plan. CLA support this policy as being separate and complimentary to community facilities policy.
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Employment

14.	DM E1: Employment areas in Merton	2.17 Strategic industrial locations Annex 3 Preferred industrial locations 4.4 Managing industrial land and premises	CLA are supportive of this policy as a local response to a strategic aim under London Plan policy it supports policy 2.17 in protecting local SIL and meets the requirements of policy 4.4 The CLA however would like to discuss Merton's Economic and Employment Land Study relationship to potential sites for new uses. In particular existing capacity and potential identified demand.
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15.	DM E2: Offices in town and local Centres	4.1 Developing London's economy 4.2 Offices 4.3 Mixed use development and offices 4.4 Managing industrial land and premises	CLA are supportive of this policy as a local response to a strategic aim under London Plan policy The CLA however would like to discuss Merton's Economic and Employment Land Study relationship to potential sites for new uses. In particular existing capacity and potential identified demand.
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16.	DM E3: Protection of scattered employment sites	4.4 Managing industrial land and premises	CLA are supportive of this policy as a local response to a strategic aim under London Plan policy.
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GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
17.	DM E4: Local employment Opportunities	4.3 Mixed use development and offices 4.4 Managing industrial land and premises	GLA are supportive of this policy as a local response to a strategic aim under London Plan policy
Natural Environment			
18.	DM O1: Open space	7.17 Metropolitan Open Land 3.6 Children and Young people's play and informal recreation facilities 7.1 Building London's neighbourhoods and communities 7.18 Protecting local open space and addressing local deficiency 5.10 Urban greening	GLA are supportive of this policy as a local response to strategic aims under London Plan policy, but reference should be made to The All London Green Grid SPG in the policy and Draft proposals map.
19.	DM O2 Trees, hedges and landscape features	7.18 Protecting local open space and addressing local deficiency 5.10 Urban greening	No comment
Design			
20.	DM D1 Design considerations in all	7.1 Building London's	GLA are generally supportive of this policy as a local response to a strategic aim under

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	Developments	neighbourhoods and communities 7.2 A inclusive environment 7.3 Designing out crime 7.5 Public Realm 7.6 Architecture 7.7 Location and design of tall and large buildings	London Plan policy, however it would be improved through reference to: London Plan housing space standards under policy 3.5 (table 3.3); policy 4.5 hotel developments should have 10% wheelchair accessible bedrooms; policy 7.7 student accommodation should incorporate 10% wheelchair accessible units or easily adaptable for wheelchair users.
21.	DM D2 Alterations and extensions to existing buildings	7.1 Building London's neighbourhoods and communities 7.6 Architecture 5.4 Retrofitting	The policy focuses on local specific design issues in relation to design and alterations and extensions. London Plan design policy supports architectural quality. A strategic consideration that should be included is retrofitting of climate mitigation measures (London Plan policy 5.4).
22.	DM D3 Managing heritage assets	7.1 Building London's neighbourhoods and communities 7.6 Architecture 7.8 Heritage Assets and Archaeology 7.9 heritage led regeneration	GLA are supportive of this policy as a local response to a strategic aim under London Plan policy as it is based on an understanding of the value and significance of the local heritage assets as set out in the Borough Character Study.

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23.	DM D4 Urban design and the public realm	7.5 Public Realm 7.6 Architecture 7.27 Blue Ribbon Network 7.7 Location and design of tall and large buildings	GLA are supportive of this policy as a local response to strategic urban design aims of the London Plan. But reference should be made to accessibility to all principles of design of the public realm (London Plan policy 7.5). under e) reference should be made to connection to local features such as the Blue Ribbon Network (policy 7.27) The text references a range of design guidance documents (paragraph 6.37) this should include the GLA London Housing Design Guide (August 2010)
24.	DM D5 Advertisements	7.5 Public Realm	No comment
25.	DM D6 Telecommunications	7.5 Public Realm	No comment
26.	DM D7 Shop front design, alterations and advertising	7.5 Public Realm	No comment
Environmental Protection			
27.	DM EPI: Opportunities for decentralised energy networks	5.5 Decentralised energy networks 5.6 decentralised energy in development proposals 5.7 Renewable energy	GLA are supportive of this policy as a local response to strategic policy within the London Plan. The borough is encouraged to discuss this matter with GLA Energy Team
28.	DM EP2: Reducing and mitigating against noise	7.15 Reducing noise and enhancing soundscapes	GLA are supportive of this policy as a local response to strategic policy within the London Plan.
Flooding and drainage			

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GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
29.	DM F1: Support for flood risk Management	5.12 Flood risk management	GLA are supportive of this policy as a local response to strategic policy within the London Plan.
30.	DM F2: Sustainable drainage systems (SuDS)	5.13 Sustainable drainage	GLA are supportive of this policy as a local response to strategic aim and policy of the London Plan.
Transport			
31.	DM T1 Support of sustainable transport and active travel	TFL TEXT	The following should be re-worded as follows: a) The council will secure improved public transport facilities and interchange opportunities through planning obligations and the Community Infrastructure Levy , including where appropriate rest/ toilet facilities for drivers, public information infrastructure and cycle parking.
32.	DM T2 Consideration of transport impacts of development	TFL TEXT	The following should be re-worded as follows: a) Planning permission will be granted for development proposals providing they do not adversely impact on the road or public transport networks, safety or congestion particularly those affecting strategically routes. 9.21 Typically a Transport assessment will include: The following should be included: • Construction Impact
33.	DM T3 Applying relevant car parking and servicing standards	TFL TEXT	No comment
34.	DM T4 Transport infrastructure improvements	TFL TEXT	The following should be re-worded as follows: 9.58. Another example is the early recognition of TFL's expected strategy on

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GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
35.	DM T5 Consideration of Connections and Access to the Road Network	TFL TEXT	<p>delivering extensions to the existing Croydon tram network in southwest London (this is expected to form an addendum to the South Sub Regional Transport Plan in spring 2012). Potential options are expected to include a new tram route between Crystal Palace and Wimbledon and Sutton town centre and Wimbledon via St Helier Hospital and Morden town centre, Sutton to Tooting via Mitcham and capacity/service improvements on the existing Wimbledon Branch Line, including a new tram stop to serve the Willow Lane Industrial Estate.</p> <p>For the Borough's information: work recently undertaken at TfL has found the Wimbledon to Sutton via Morden and St Helier option to have a stronger strategic and business case than the Sutton to Tooting option, so the Wimbledon to Sutton option is being prioritised in the Addendum to the SRTP.</p>
Site and Transport Proposals			
36.	A.2 Transport Proposals	TFL TEXT	TFL TEXT
37.	B Open space proposals	TFL TEXT 2.18 Green Infrastructure: The network of open and green spaces	<p>GLA are supportive of the open space proposals as a local response to strategic aim and policy of the London Plan.</p> <p>London Plan identifies the Wandale Valley as a Regional Park Opportunity evolved through boundary cooperation this should be included within the text.</p> <p>GLA are supportive of the natural environment proposals as a local response to strategic aims and policies of the London Plan.</p>
38.	C Natural environment proposals		<p>GLA are supportive of the conservation areas, historic parks and listed building proposals as a local response to strategic aim and policy of the London Plan.</p>
40.	E Archaeological Priority Zones		<p>GLA are supportive of the archaeological priority zones and ancient monuments</p>

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	and Ancient Monuments		proposals as a local response to strategic aims and policies of the London Plan.
41.	F Sequential Test and Impact Assessment		CLA are supportive of this policy as a local response to strategic aim and policy of the London Plan.
42.	C Flood Risk Assessments		CLA are supportive of this policy as a local response to strategic aim and policy of the London Plan.

Potential sites for new uses

43.	Site proposal 48	Land at Bushey Road	The site is identified within the London Plan as a designated SIL. Following analysis of the qualitative site assessment in Merton's Economic and Employment Land Study, and discussion with the borough. It is accepted that given the scale and level of non industrial uses and their fragmented nature that the site would not under current London Plan/SPG criteria be recognised as a SIL. Further, the site would be considered for de-allocation in the future review of the London Plan.
44.	Site proposal 01	P3" Hartfield Road Car Park Cark Park Site of No. 66-84, Hartfield Road, Wimbledon, SW19 3TB	Sir Cyril Black Way Bus Stand is located within the red line boundary of the proposed site. This is a very important asset and must be protected from any potential development if bus services in the area are to adequately provided. The current wording of the document doesn't acknowledge the importance of the stand. TfL requests that the appropriate section for this site proposal safeguards the bus interchange, unless a suitable alternative that results in no overall loss of capacity or convenience can be provided by the developer in the immediately adjacent area and to the satisfaction of TfL. This request is in accordance with policy 6.2 in the London Plan and paragraphs 18.7, 18.11 and SPC 18 of the emerging Land for Industry and Transport Supplementary Planning Guidance.

Draft proposals Map

45.	Section A Unaltered Areas		CLA are supportive of the proposal map as a local response to strategic aim and
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			policy of the London Plan
46.	Section B Agreed Changes		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
47.	Section C Centres		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan. Colliers Wood is not identified in London Plan as a town centre (Table A2.1) or potential change to the town centre network (Table A2.2). It is however allocated as an area of intensification (with South Wimbledon) Table A1.2 of the London Plan states The potential for redevelopment and reconfiguration of the edge- and out of centre retail parks at Colliers Wood to contribute towards the establishment of an integrated town centre along with improvements in public transport and local accessibility should be explored.
48.	Section D Neighbourhood Parades		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
49.	Section E Shopping Frontages		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
50.	Section F Open space		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
51.	Section G Local nature reserves		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
52.	Section H Green corridors		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
53.	Section I SINCS		GLA are supportive of the proposal map as a local response to strategic aim and policy of the London Plan
54.	Section J Transport Proposals	TFL TEXT	TFL TEXT