27th February 2013

To:
ldf@merton.gov.uk

Response to Merton Council on the LDF Sites and Planning Consultation

I have outlined our response to the draft sites and planning policies below:

Town Centres

We agree with the policy proposals outlined on p15 a-c except on (c) we would suggest a more open approach to the amalgamation of shop units if such action was in the interest of maintaining a sustainable town centre.

We strongly support the Justification 1.3 to provide a focus for community and civic activity, along with point 1.20 on p20.

Page 22 1.29 in support

Page 30 – 12 months is definitely too long, and is not a usual requirement. It will benefit the Council as much as landlords if that was scrapped - or at the very least reduced to 3 months - as we need to do all we can to encourage lettings in the current climate.
and in support of 1.46

Page 34 – support 1.78 and 1.79

Page 61 3.7 and 3.8 – the length of time to market empty sites seems extremely long at 30 months. Is it feasible for this time frame to be shortened.

Page 62 – could proposals for new community facilities be covered in this section

Employment

Page 75 – 4.50-4.52
Would like to see robust management of local procurement and local employment as part of planning consent with conditions set out for how this would be followed up and conditions enforced.

Natural Environment

Page 76 – 5.1 – support mention of open space assisting with biodiversity, surface water run-off and flood risk but would welcome additional plans for green infrastructure with respect to this eg green roofs.
Page 78 – 5.14 – whilst undesignated open spaces are seen as not relevant to this policy, we would support more proactive use of these spaces in terms of sustainability eg community food growing as part of a plan for local food security (rather than these spaces being seen as insignificant and perhaps only useful for recreation and leisure).

**Design**

Page 82 – avii) with regard to external lighting, we support the concerns regarding light pollution but would also welcome a policy to use energy-efficient lighting; axi) - we support the promotion of sustainable management of construction site waste.

Page 82 – 6.1 – we would welcome some mention of the use of energy-efficient technologies in design policies, including in heritage buildings where appropriate.

Page 83 – 6.9 – we welcome new developments needing to demonstrate effective use of materials, water and other resources.

**Environmental Protection**

Page 99 – 7.1 – we support the development of new decentralised energy networks but are keen that other renewable energy solutions are not overlooked as viable alternatives, where appropriate eg making provision for solar energy, which is not currently mentioned at all.

Page 105-106 – 7.18 and 7.25 – we support the establishment of a Merton Community Energy Fund

Page 105 – 7.21 – we would like to see mention of businesses as well as homes, in terms of addressing regulated and unregulated carbon emissions

Page 109 – 7.40 – we welcome the use of Sustainable Urban Drainage Systems (SUDS)

**9. Transport**

Page 119 – we are pleased to see sustainable transport being promoted so well within the policy.

Yours faithfully

Helen Clark Bell
Love Wimbledon BID Manager