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Introduction

Merton’s Core Strategy has been prepared in accordance with our Statement of Community Involvement and the Local Development (Amendment) Regulations 2008. Consultation stages that were carried out before the 2008 Regulations are still relevant and are provided for by the ‘transitional arrangements’ contained in the 2008 Regulations.

This Consultation Statement meets the requirements of Regulation 30(d) by setting out
- which bodies and persons were invited to make representations under Regulation 25;
- how these bodies and persons were invited to make such representations;
  a summary of the main issues raised by those representations; and
- how those main issues have been taken into account in the preparation of the Core Strategy.
Who was consulted?

Specific consultation bodies

British Gas
British Telecom Plc, (RPS on behalf of)
Centric Telecom Ltd
Coal Authority
Countryside Agency
CPRE London
DEFRA
Department for Culture, Media and Sport (DCMS)
Department for Transport (DIT)
Department for Work and Pensions (DWP)
Dept for Business Innovation and Skills
Dept for Energy and Climate Change
EDF Energy Networks
EDF Energy Properties
Energis Communications Ltd
English Heritage - London Region
Environment Agency
Environment Road Table
Government Office for London
Greater London Authority
Highways Agency
Homes and Communities Agency
London Borough of Croydon
London Borough of Lambeth
London Borough of Sutton
London Borough of Wandsworth
Local Government Association

London Development Agency
London Energy
London Fire and Emergency Planning Authority
Merton Priory Trust
Mobile Operators Association (MOA)
National Grid
Natural England
Network Rail
NHS London Healthy Urban Development Unit
NTL
Planning Inspectorate
Powergen Plc
Royal Borough of Richmond upon Thames
Royal Borough of Kingston upon Thames
South East England Partnership Board
South London Partnership
South West London NHS Support Services Partnership
Sutton and Merton Primary Care Trust
Thames Water
Thames Water Utilities Ltd
Transport for London
Transport for London - Borough Partnerships
Virgin Mobile

General Consultation Bodies

19th Wimbledon Scout Group
Abaana Bantu
Abbey Multi-Agency Group Residents Association
Abbey Ward Political Organisation
Abbotsbury Primary School
Abbotsbury Road School
Affinity Sutton Housing Association

African Educational Cultural and Health Organisation (A.E.C.H.O)
African Refugees Project
Ahmadiyya Muslim Association (EMC)
AIB Group (UK) PLC
All England Lawn Tennis Club
All Nations Revival Church (38)
All Saints Church of England Primary School
All Saints Church South Wimbledon
Alliance Planning
Alliance Property Developments Ltd
Alsop Verrill LLP
Anchor Housing Association
Ann Vaughan-Williams- Community Group
Aragon Primary School
Armchair London South (Buses)
Arriva London South (Buses)
Arup
Ashill Developments
Asian Diabetic Support and Awareness Group
Asian Elderly Group of Merton
Asylum Welcome
ATIS Real Weatheralls
Audichya Gadhia Brahma Samaj Society. (AGBSS)
B & Q Plc, (Indigo Planning on behalf of).
B E Manji & S B Manji
B Nebbett and Son Ltd
Baha’i Community of Merton
Baitul Futuh Mosque Youth Organisation
Balham Sport and Social Club
Barnfield Construction (UK) Ltd
Barton Willmore Planning Partnership
Beaver
Beecholme Primary School
Bellway Homes
Bendict Primary School
Benedict primary School
Bengali Association of Merton
Bentley-Leek Properties Ltd
Berkeley Urban Renaissance
Berkley Strategic
Bewley Homes Plc
Bishop Gilpin Church of England Primary School
Bishopsford Community School
Black Ethnic Cultural & Welfare Organisation (BECWO)
Blossom House Special School
Blue Sky Planning
BME TVFM Charitable Foundation
Bond Primary School
Bourne Housing Association
Breaking Free
Bree Day Partnership – Merton Design Review Panel
Brian Madge
British Motorcyclists Federation
British Muslim Association of Merton
British Telecom
Brixton Plc
Burgess Mean Architects
Bus Priority Team
Byrne Group PLC
CABE
Cadugan Developments Ltd
Campaign for Real Ale
Cannon Hill Ward Political Organisation
Cantos Bailey
Carpenter Planning Consultants
Casson Conder Partnership – Merton Design Review Panel
Catholic Children Society
CDC2020
Central and Cecil Housing Association
Centrica plc
CgMs Consulting
Chartered Institute of Waste Management
Chase Hospice Care For Children
Cherwell Land and Homes Ltd
Children and Parents Carnival Association
Christopher Skilton
Christopher St James PLC
Church Commissioners
City Bridge Trust – Merton Design Review Panel
Civil Aviation Authority
Cluttons LLP
Colliers Wood Community Association
Colliers Wood Little League Football
Colliers Wood Residents’ Association
Colliers Wood Ward Political Organisation
Colliers Wood Youth and Play Working Party
Colliersbridge Properties Ltd
Commonside Community Development Trust
Community Home Care Provider
Connexions – Prospects
Cottenham Park Allotments
Countryside Properties PLC
Hillside Ward Political Organisation
Hollymount Primary School
Holy Trinity Church of England Primary School
Home Builders Federation
Housing 21 Housing Association
HWD Property
Hyde Housing
Inland Waterways Association
Insight
International Properties (Wimbledon) Ltd
JAC Barrington
Jenner Jones Surveyors
Jones Lang LaSalle
Joseph Hood Primary School
Kairos Church
Kelsey Housing Association
Kender Homes
King Sturge
Kings College (7-18 boys)
Kingscrown Developments Ltd
Kingsoak Homes Ltd
Kirsten Jeske – Merton Design Review Panel
Kitewood Estates Ltd
Krystina Brooks – Merton Design Review Panel
Laing Homes Ltd
Lakebird Properties Ltd
Lambton Road CA
Lavender Fields Ward Political Organisation
Lavender MAG (Multi-Agency Group)
Leander (Wimbledon) Ltd
Lewis and Hickey Architects
LFEPA
Liberty Primary School
Linden Homes
Links Primary School
Linkwood Consultants Ltd
Lions Club of Merton
Little League (Mitcham)
Little League Mitcham
Little League Wimbledon
Living Streets
London Ambulance Service
London Ambulance Service NHS Trust
London and Quadrant Housing Trust
London Borough of Westminster – Merton Design Review Panel
London Bus Initiative
London Bus Services Ltd
London Cycling Campaign
London Dial-a-Ride
London Dioceses
London Fire and Civil Defence Authority
London General Transport Services
London Genral (Buses)
London Housing Federation
London Oriel Cultural & Social Club
London South West Chinese Community Association
London TravelWatch
London Underground
London United Busways
London Wildlife Trust
London Wildlife Trust Merton Group
Lonesome Primary School
Longthornton Ward Political Organisation
Lower Morden Ward Political Organisation
M & M Architectural Services
Majorlink Ltd
Malcolm Scott Consultants Ltd
Malmesbury Primary School
Manuplastics Ltd
Marcus Beale Architects Ltd
Maurice Cox
Mayer Brown Ltd – Merton Design Review Panel
McCarthy & Stone (Developments) Ltd
Melrose School
Melrose Special School
Member of Parliament for Mitcham and Morden
Member of Parliament for Wimbledon Constituency
MeMu (Merton Multicultural Cooperative Ltd)
Merton Abbey Primary School
Merton African Organisation
Merton Carers Partnership
Merton Churches
Merton Churches Asylum Seekers’ Support Group
Merton Cycling Campaign
Merton Division Girlguides
Merton Executive Committee
Merton Governors The Council
Merton Hall FC
Merton Historical Society
Merton Liberal Democrats
Merton Mental Health Users Forum
Merton Park
Merton Park Primary School
Merton Park Ward Political Organisation
Merton Partnership / Wimbledon Town Centre Partnership
Merton Priory Trust
Merton Racial Equality Partnership
Merton Sickle Cell and Thalassaemia Group
Merton Somali Community (MESCO)
Merton Town Trails Association
Merton Tree Warden Group
Merton Unity Network
Merton Voluntary Service The Council
Merton Volunteer Bureau
Merton Women's' Drop-In Community Group
Merton Youth Awareness Programme
Merton Youth Forum
Merton Youth Offending Service
Merton's Children's The Council Coordinator
Metrobus
Metropolitan Police
Metropolitan Police Wimbledon
Millat Asian Housing Association
Mitcham Baptist Church
Mitcham Common Conservation
Mitcham Congregation of Jehovah's Witnesses
Mitcham Cricket Green Community & Heritage Trust
Mitcham Fire Station
Mitcham Parish Church
Mitcham Police Station
Mitcham Society Residents Association
Mitcham Working Group
MJ Newman
Moat (Pollards Hill) Housing Association
Morden Baptist Church
Morden Cricket Club
Morden Little League
Morden Methodist Church
Morden Park Baptist Church
Morden Park Playing Fields Association (MPPFA)
Morden Primary School
Motorcycle Action Group
Murray Denham RIBA
Nathaniel Litchfield and Partners
National Grid plc
National Playing Fields Association
National Trust, Thames and Solent Region
Navalmar (UK) Ltd
Network Rail
New Bridges Club (The)
New Wimbledon Theatre
Norland Conservation Society
Norman Road Haulage (Wimbledon) Ltd
Notting Hill Housing Group
Older People's Housing Forum
Orbit Housing Association
Pakistan Cultural Association of Wandsworth and Merton
Pakistan Welfare Association
Palace Gate Properties Ltd
Parsons Brinckerhoff
Pathway Housing Association
Paul Brookes Architects
Paul Dickinson & Associates
Paul Kentish & Co
Peacock and Smith
Pearl of Africa Foundation (PAF)
Pedestrians Association
Pelham Primary School
Peter Pendleton & Associates Ltd
Phipps Bridge MAG (Multi-Agency Group)
Planning & Regeneration Ltd
Planning Perspectives
Planning Potential
Pollards Hill Ward Political Organisation
Poplar Primary School
Port of London Authority
Possfund Custodian Trustee Ltd
Priory Church of England Primary School
Project Design Partnership
Protection of Rural England
The Harris Academy Merton
The Home Builders Federation
The Hon. Soc. of the Inner Temple – Merton Design Review Panel
The John Innes Society
The Lawn Tennis Association
The Migrant and Refugee Communities Forum
The Norwegian School (3-16)
The Rowans School (3-9)
The Sherwood Primary School
The Theatres Trust
The Unite Group plc
The Wimbledon Guild
Thorne & Thorne Architects
Threshold Housing Association
Tony Michael
Tooting & Mitcham Sports & Leisure Ltd
Tower Homes
Transport & Travel Research Ltd
Transport for London
Travel London
Travellers/Gypsies Advisor
Trinity Church Wimbledon
Trinity Ward Political Organisation
United Response
Ursuline Preparatory School
Ursuline Roman Catholic High
Ursuline Secondary School
Victim Support
Village Ward Political Organisation
Viridor Waste (Thames) Ltd
Viscount Cricket Club
Wandle Housing Association
Wandle Industrial Museum
Warden Housing Association
West Barnes Ward Political Organisation
West Wimbledon Primary School
West Wimbledon Residents' Association
White Young Green
William Morris Primary School
Willington School (4-13 boys)
Willow Lane Action Group
Wimbledon and Putney Commons Conservators
Wimbledon Chase Primary School
Wimbledon College
Wimbledon Common Preparatory School (Squirrels)
Wimbledon Community Association
Wimbledon District Philatelic Society
Wimbledon Fire Brigade/Station Commander
Wimbledon High (4-18 girls)
Wimbledon Independent Supporters Association
Wimbledon International 7th Day Adventist Church
Wimbledon Literary & Scientific Society
Wimbledon Park Heritage Group
Wimbledon Park Primary School
Wimbledon Park Ward Political Organisation
Wimbledon Society Residents Association
Wimbledon Taxi Drivers
Wimbledon Town Centre Co-Ordinator Group
Wimbledon YMCA
Women's National Commission
WS Atkins plc – Merton Design Review Panel
Youth Culture Television (YCTV)
Businesses
AHC Associates
Andrew Pinchin Architects Ltd
Architect
Assael Architecture
Aubergine Art & Picture Framing Ltd
B & D Clays & Chemicals Ltd
B G Transco
BERA
Cappagh Group
Centre Court Shopping Centre
Chartered Institute of Personnel and Development
Chris Thomas Ltd - Outdoor Advertising Consultants
F and C Property Asset Management
Fitness First
Functional Intelligent Training
Gerald Eve
Gina’s Nannies
Herrington Consulting Ltd
HH Technology T/A Art of Computing
Hunt Motors (Wimbledon)
International Refugees Organisation Ltd
IT Phoenix

Killoughery Group
L&M Materials
Lafarge Aggregates Ltd
Landsdale Florists
Levvel Ltd
London Interspace Ltd
McDonalds Mitcham
Merton Chamber of Commerce
Mitcham Golf Club
Mono Consultants
Radio Jackie Ltd
Sainsbury’s Merton
South London Crematorium / Dignity Funerals Ltd
Sterling Insurance Group
Stewart Ross Associates
TG21 plc
The Mill House Brewers Fayre
The Planning Bureau Limited
The Watershed
Up-Town Dance Club & Learning Centre
Waitrose
Windsor Stebbing Marsh
Workspace Group Plc

Residents
A total of 768 letters and emails were sent to Merton Residents.
Consultation methods

The Council engaged with a wide range of consultees including statutory bodies, residents’ associations, community and interest groups and hard to reach groups at all stages of public consultation on the Core Strategy. The following engagement methods were used to invite consultees to provide feedback on the Core Strategy.


Consultation documents - A series of Key Issues leaflets were produced covering topics including employment, housing, open space and vision options for Merton. An accompanying response questionnaire was also produced to encourage feedback on the key issues.

Notification and Publicity – The consultation was widely publicised to ensure The Council reached as many sectors of the community as possible. A local advertisement notice was placed in the Wimbledon, Mitcham and Morden Guardians on the 5th December 2005. The consultation was advertised on The Council notice boards, in the staff bulletin and in ‘My Merton’ magazine. The consultation documents were published on the Council’s Website, and made available in Merton’s libraries and Merton Civic Centre.

Correspondence – Notification letters and emails were sent to specific consultation bodies, general consultation and residents and businesses in Merton. A dedicated telephone and e-mail service was provided and Council officers were available to answer enquiries and provide further information. Council officers made direct contact by phone calls to Black and Minority Ethnic (BME) groups and business groups to raise awareness about the consultation and encourage their involvement.

Meetings and presentations – Meetings were held with hard to reach groups, community groups, business groups and residents associations. Particular attention was given to involving ‘hard to reach groups’ such as ethnic minorities, young people and gypsies and traveller groups in the consultation exercise as these groups have been traditionally under represented in planning processes. Presentations to raise awareness were also made to ethnic minority groups and hard to reach groups. Focus group meetings were held with ethnic minority groups and community groups. Council officers also attended internal meetings of groups and organisations to discuss the LDF key issues.

One to one meetings – One-to-one meetings were held with several representatives of ethnic minority groups. Typically, ethnic minority groups have been under represented in the planning process and the one to one meetings aimed to raise awareness and encourage further involvement in the LDF process. One to one meetings were also held with other groups as requested, including civic societies, residents associations and community groups.

Workshops – Workshops were held with schools to increase youth involvement in the LDF process. Planning Aid provided assistance with a number of these workshops.

Public meetings and Area Forums – Area forums are existing public meetings that cover a specific geographical area. The forums provided an opportunity to discuss LDF key issues and present information to the local community members. Four area forums were held at Wimbledon, Mitcham, Wandle and Morden. A public meeting was held at Commonside Trust.
Options Consultation – February 2006 – April 2006

Consultation documents - Based on the findings from the Key Issues consultation, a series of Options papers were prepared. The options papers provided a range of options to address issues including those relating to town centres, sustainable communities, open spaces, climate change, and leisure. A response form accompanied the options papers and was used to provide feedback on the options.

Notification and Publicity – A local advertisement notice was placed in the Wimbledon, Mitcham and Morden Guardians. The consultation was advertised on the Council notice boards and published on the Council’s Website. The consultation documents were available in Merton’s libraries and Merton Civic Centre. Flyers were produced to advertise public meetings.

Correspondence – Notification letters and emails were sent to specific consultation bodies, general consultation bodies and residents and business in Merton. A dedicated telephone and e-mail service was provided and the Council officers were available to answer enquiries and provide further information. The Council officers made direct contact by phone calls to BME groups to inform them of the consultation and encourage their involvement.

Meetings and presentations – Meetings were arranged and attended by the Council Officers through existing networks, such as schools, voluntary and community groups and local civic trusts to engage with Merton’s communities as part of this consultation stage.

Meetings with BME groups – Meetings were organised with BME groups to encourage their participation and involvement. A number of BME representatives attended a BME forum. The Council worked closely with organisations involved with each of these groups to alert them to the LDF consultation and the importance to their community.

Workshops – Workshops were held with Merton College and Ursuline High School. An LDF open day was held at the Commonside Trust in Mitcham. The open day involved four focus group workshops with older people, young mums, ethnic minority groups and the general public.

Public meetings and Area Forums – Public meetings were held in Mitcham, Morden, Colliers Wood and Wimbledon, specifically to discuss the Core Strategy options. Planning Aid facilitated the public meetings.


Consultation documents – Three spatial options were developed and consulted upon. The consultation documents included a Spatial Policy Options paper, a summary paper and response form.

Publicity – A local advertisement notice was placed in the Wimbledon, Mitcham and Morden Guardians. The consultation was advertised on notice boards and published on the Council’s website. The consultation documents were available in Merton’s libraries and Merton Civic Centre.

Correspondence – Letters and emails were sent to specific consultation bodies, general consultation bodies and residents and businesses in Merton. Follow up emails and telephone calls were made during consultation to encourage responses. A dedicated telephone and e-mail service was offered where the Council officers were available to answer enquiries and
provide further information. The Council officers made direct phone calls to BME groups to
notify them of the consultation and encourage their involvement.

Meetings, focus groups and presentations – A continued focus of the meetings was ‘hard
to reach groups’. Meetings were held with BME groups and Merton College to discuss the
spatial policy options and a presentation was made to the Joint Consultative Committee
Ethnic Minority Groups. Meetings were also held with a number of community and business
groups.

Public meetings and area forums – Reports on the Spatial Policy Options were presented
at four area forum meetings. No public meetings were held during this consultation.

Preferred Options Consultation – 11th June 2007 – 23rd July 2007

Consultation documents - The consultation documents included the Core Strategy,
Development Control Policies, Sustainability Appraisal and Proposals Map. A context
document provided essential background information on Preferred Options. A summary
leaflet was prepared which outlined the main aims and purpose of the consultation.

Publicity – A local advertisement notice was placed in the Wimbledon, Mitcham and Morden
Guardians on the 6th June 2007. The consultation was advertised in 'My Merton' Magazine,
which is distributed to all households in the borough. The consultation documents were
published on the Council’s website and respondents were able to view documents and make
representations online. All documents were made available to view at Merton libraries and
Merton Civic Centre.

Correspondence – Correspondence was sent to specific consultation bodies, general
consultation bodies and residents and businesses in Merton. Follow up letters and e-mails
were sent and phone calls were made throughout the consultation to remind consultees to
respond. A dedicated telephone and email service was provided and Council Officers were
available to answer enquiries and provide further information. Community groups were
contacted to explain the LDF and ask if they would like to be involved. Members were also
contacted to inform them of the consultation.

Help desk – Two help desk sessions operating during the weekend and evening times were
established to provide assistance in answering last minute queries and completing
questionnaires.

Exhibition stalls – Stalls were set up at the Mitcham Carnival and markets organised by
Commonside Trust. The stalls were useful in publicising the event and distributing
consultation material.

Meetings –Council Officers attended meetings with local community groups to promote the
Core Strategy and encourage responses. Meetings were held with Merton Partnership,
Merton College and Ursuline High School, local business and residents groups. During this
stage of consultation particular focus was given to hard to reach groups that had not
responded well to previous consultations. There was an increase in the number of meetings
and focus groups with hard to reach groups, including BME groups and youth groups. A
meeting was arranged with the Asian Elderly Group, with information presented in Hindi.

Public meetings and area forums - Presentations were made to a number of area forum
meetings and other established public meetings; however, LDF-specific public meetings
were not held. The meetings provided an opportunity to present information and briefly
discuss the issues raised in consultation. Reports were presented to the Morden, Lower
Morden, Central Wimbledon, North Wimbledon, North West Mitcham and South East Mitcham area forum meetings.

**Consultation Draft Plan – 7th September 2009 – 16th October 2009**

(Representations were accepted after the 16 October due to the impacts of the London-wide Royal Mail postal strike).

**Consultation documents** – A summary document ‘Our Plan our Future’ was produced to accompany the draft Core Strategy. This summary document highlighted the importance of the draft Core Strategy and provided an overview of the proposed strategies and policies. The summary document also included a questionnaire, which was based on the requirements of the ‘test of soundness’.

**Publicity** – The consultation was publicised using a variety of methods. A local advertisement notice was placed in the Wimbledon, Mitcham and Morden Guardians on the 24th September 2009. An advertisement and article were placed in the Wimbledon Guardian on the 10th September 2009. Notices were placed on internal notice boards, in the staff bulletin and ‘My Merton’ magazine. The consultation documents were displayed and made available in Merton Civic Centre. They were also made available in all Merton libraries. The consultation documents were published on the Council’s website and respondents were able to view the draft Core Strategy and make representations online.

**Correspondence** – Notification letters and emails were sent to specific consultation bodies, general consultation bodies and residents and businesses in Merton. Two weeks prior to the consultation closing date, approximately 180, randomly selected, consultees, who were yet to respond, were contacted to remind them of the closing date for representations. Reminder email notifications were also sent to all consultees who provided email contact addresses. The Council Officers made follow up telephone calls to representatives of 30 groups, which previously had low response rates (known as “hard to reach groups”) to encourage representations on the consultation.

**Meetings** – Council Officers attended approximately 20 meetings with a number of different groups, including residents associations, community and voluntary societies and youth groups. Council officers also attended the Merton and Wimbledon Lions Summer Fair in Morden Park to distribute consultation material, provide advice and raise publicity.

**Area forum meetings** – The Core Strategy was discussed at a number of community forum meetings, including Wimbledon on 13th October, Mitcham on 23rd September, Morden on 13th July, Colliers Wood on 22nd September and Raynes Park on 15th July 2009.

**Pre-submission Representations 9th August 2010 – 30th September 2010**

Following resolution on the 14th July 2010 by Merton The Council, to submit the Core Strategy to the Secretary of State, the Core Strategy submission version was published on 3rd August, with the publication ending on 30th September 2010. The pre-submissions representations stage provided the final opportunity for comments on the plan to be considered by an independent Planning Inspector.

**Consultation documents** – The consultation documents consisted of the Core Strategy, accompanying questionnaire and the sustainability appraisal. The research and evidence base that informed the Core Strategy and provided supporting information, was also made available on the Council’s website.
**Publicity** – A local advertisement notice was placed in the Wimbledon, Mitcham and Morden Guardians on the 26th August 2010. The draft Core Strategy was published on the Council’s website. The consultation documents were available in Merton libraries and in Merton Civic Centre.

**Correspondence** – Notification letters and emails were sent to specific consultation bodies, general consultation bodies and residents and businesses in Merton. Reminder letters and emails were sent to notify consultees of the closing date for representations.
Statement of Community Involvement

Merton’s Statement of Community Involvement (SCI) was adopted in 2005 and describes how the community can be involved in preparing Merton’s LDF. The SCI is part of the LDF, and sets out Merton The Council’s commitment to community involvement in planning. It explains how Merton’s communities can let the Council know what they think about new planning policies and guidance, and on planning applications. It also shows how different LDF documents will be prepared and how people can expect to hear about them. The following table outlines the methods of consultation identified in the SCI and the methods of consultation that were utilised during the various consultation stages of the Draft Core Strategy.

<table>
<thead>
<tr>
<th>Consultation methods set out in SCI</th>
<th>Consultation methods actually used</th>
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<tbody>
<tr>
<td>Key Issues</td>
<td></td>
</tr>
<tr>
<td>• Press release to local papers</td>
<td>• A local advertisement notice in guardians on 5&lt;sup&gt;th&lt;/sup&gt; December 2005.</td>
</tr>
<tr>
<td>• Newspaper notice</td>
<td>• The consultation documents included 12 Key Issues leaflets covering topics such as Employment, Housing and Open Space and response questionnaire.</td>
</tr>
<tr>
<td>•, Merton The Council leaflets</td>
<td>• Merton The Council’s website contains a dedicated LDF webpage, providing information on the LDF process and consultations.</td>
</tr>
<tr>
<td>•, Outreach community consultation</td>
<td>• Key Issues leaflets and response questionnaire were published on the Council’s website.</td>
</tr>
<tr>
<td>•, One-to one meetings</td>
<td>• Notification letters and emails sent to all contacts on the LDF consultee database on the 15&lt;sup&gt;th&lt;/sup&gt; and 16&lt;sup&gt;th&lt;/sup&gt; November 2006. Follow up emails sent 9&lt;sup&gt;th&lt;/sup&gt; January 2007 and letters sent 25&lt;sup&gt;th&lt;/sup&gt; January 2007.</td>
</tr>
<tr>
<td>•, Dedicated phone and email</td>
<td>• Meetings were organised with youth groups, business forums such as Merton College, community groups such as Wimbledon Civic Forum and BME groups, such as Goan Elderly Association to discuss the LDF key issues.</td>
</tr>
<tr>
<td>•, The Councillors surgeries</td>
<td>• One-to-one meetings were held with a number of representatives from BME groups during the LDF key issues consultation, including South London Refugee Association and South London Tamil Welfare Group.</td>
</tr>
<tr>
<td>•, Area forums</td>
<td>• The consultation material provided details of a dedicated telephone and email address.</td>
</tr>
<tr>
<td>•, Partnership meetings</td>
<td>• All The Councillors were notified on the consultation. This helped inform The Councillors in preparation of any queries raised at their surgeries on the consultation. No issues were reported by The Councillors from their surgeries.</td>
</tr>
<tr>
<td>•, Committees</td>
<td>• The Council officers presented information on the LDF process, and reports on the key issues and options consultation were presented to Wimbledon area forum meeting 26&lt;sup&gt;th&lt;/sup&gt; January 2006 and Mitcham Area Forum meeting 1&lt;sup&gt;st&lt;/sup&gt; February 2006.</td>
</tr>
<tr>
<td>•, Regular consultation surveys</td>
<td>• A meeting was held with Wimbledon Partnership on the 12&lt;sup&gt;th&lt;/sup&gt; January 2006 and Leisure Partnership on the 15&lt;sup&gt;th&lt;/sup&gt; January 2006.</td>
</tr>
<tr>
<td></td>
<td>• A report to the Borough Plan Scrutiny Panel on the 5th December 2005 outlined the proposed approach to the key issues and options, timetable and methods of community consultation. A report to the Borough Plan Scrutiny Panel on the 6th December 2005 outlined consultation that had been undertaken and set out how hard to reach groups would be involved.</td>
</tr>
</tbody>
</table>
|                                     | • The Key Issues questionnaire provided a section for respondents to provide feedback on the consultation.
### Options

- Press release to local papers
- Newspaper notice
- The Council leaflets
- Merton The Council website
- Direct mail shots
- Outreach community consultation
- Dedicated phone and e-mail
- The Councillors surgeries
- Area forums
- Partnership meetings
- Committees
- Regular consultation surveys

- A local advertisement notice in the Wimbledon, Mitcham and Morden Guardians.
- Consultation documents were published on the Council’s website.
- Consultation documents included five ‘Options’ summary leaflets and response questionnaire.
- Correspondence sent to all contacts on LDF consultee database notifying of consultation and inviting their response. Letters sent 2nd and 6th of March 2006.
- Attendance of meetings with various groups and organisations to publicise consultation. The LDF Options were discussed at meetings with business groups, such as Mitcham Business Forum, community groups such as Wimbledon Society, youth groups, such as Ursuline High School and a BME forum.
- The consultation material provided details of a dedicated telephone and email address.
- All The Councillors were notified on the consultation. This helped inform The Councillors in preparation of any queries raised at their surgeries on the consultation. No issues were reported by The Councillors from their surgeries.
- The Council Officers attended area forums and provided details of the Core Strategy Options at Mitcham area forum meeting held 23rd March 2006, Raynes Park on 23rd February 2006 and Morden on the 9th February 2006. A letter advising of the dates for the Options consultation was attached to the Wimbledon area forum meeting agenda held 23rd March 2006. Four public meetings were held, specifically to discuss the Core Strategy in Wimbledon on the 23rd March, Mitcham 8th March, Morden 15th March and Colliers Wood 28th March.
- The Council officers attended partnership meetings with Merton Partnership, Mitcham Partnership, Wimbledon Partnership and Morden Business Partnership.
- A report to the Borough Plan Advisory Panel on the 26th June 2006 outlined how the key issues and options consultation was carried our and efforts to engage with hard to reach groups. The report provides a summary of the consultation results. Report to Joint Consultative Committee Ethnic Minority Organisations on the 21st February 2006.
- The Options questionnaire contained a section for respondents to provide feedback on the consultation.

### Spatial Policy Options

- Press release to local papers
- Newspaper notice
- The Council leaflets
- Merton The Council website
- Direct mail shots
- Outreach community consultation
- Dedicated phone and e-mail
- The Councillors surgeries
- Area forums
- Partnership meetings

- A local advertisement notice in Wimbledon, Mitcham and Morden Guardians.
- The consultation documents included a Spatial Policy Options paper, a summary paper and response form.
- Consultation documents were published on the Council’s website.
- Notification letters and emails sent to all contacts on LDF consultee database. Letters sent 6th November 2006 and emails sent 15th November 2006.
- Outreach consultation meetings including community groups, such as Mitcham Society, House Builders and Developers, including Housing associations and a joint BME forum.
- The consultation material provided details of a dedicated telephone and email address.
- All The Councillors were notified on the consultation. This helped inform The Councillors in preparation of any queries raised at their
- Committees
- Regular consultation surveys

- Attended of The Council Officers and reports to North West Mitcham, North Wimbledon, Morden, Lower Morden and Central Wimbledon area forum meetings to publicise consultation.
- The Council staff attended partnership meetings, including Merton Partnership, Mitcham Partnership and Morden Town Centre Partnership.
- Report to Borough Plan Advisory Panel on the 11th April 2007. The purpose of the report was to seek agreement on the preferred options Core Strategy and development control policies recommended for public consultation.
- The Spatial Policy Options response questionnaire provided questions for respondents to provide feedback on the consultation.

**Preferred Options June–July 2007**

- Press release to local papers
- Newspaper notice
- The Council leaflets
- Merton The Council website
- Direct mail shots
- Dedicated phone and email
- Committees
- Merton Link and libraries

- A local advertisement notice in Wimbledon, Mitcham and Morden Guardians on the 6th June 2007.
- The consultation documents included the Core Strategy, Development Control Policies, Sustainability Appraisal, Proposals Map, a context document and summary leaflet.
- All consultation documents and questionnaire were published on the Council’s website.
- Notification letters and emails sent to all contacts on the LDF consultee database. Letters sent 8th June 07. Follow up letter sent 5th July 07.
- The consultation material provided details of a dedicated telephone and email address.
- Report to Borough Plan Advisory Panel 28th June 2007. The purpose of the report was to outline the LDF timetable, the main evidence base studies needed for a sound LDF, future meetings of the Panel, their status and main issues to consider, and to set out the resources available to meet agreed targets for the LDF preparation.
- Consultation documents were available in Merton’s libraries and Merton Civic Centre.

**Draft Core Strategy September–October 2009**

- Press release to local papers
- Newspaper notice
- The Council leaflets
- Merton The Council website
- Direct mail shots
- Outreach community consultation
- Dedicated phone and email
- The Councillors surgeries
- Area forums
- Partnership meetings
- Committees

- A local advertisement notice in local guardians on the 24th September 2009.
- Press release and article in Wimbledon Guardian on the 10th September 2009.
- Summary leaflet ‘Our Plan Our Future’. A response questionnaire was included in the summary leaflet.
- Consultation documents and questionnaire were published on the Council’s website.
- Notification letters and emails sent to all contacts on the LDF consultee database on the 7th September 2009.
- Outreach community consultation included meetings with community associations, such as Wimbledon Society, youth groups, including Merton Youth Partnership Forum, residents associations, such as Raynes Park Association, BME workshops, such as Ethnic Minority Community Input Workshops.
- The consultation material provided details of a dedicated telephone and email address.
- Regular consultation surveys
- All The Councillors were notified on the consultation. This helped inform The Councillors in preparation of any queries raised at their surgeries on the consultation. No issues were reported by The Councillors from their surgeries
- The Council Officers provided an update on the progress of the Core Strategy Consultation and invited representations at Morden, Raynes Park and Lower Morden, Colliers Wood, Mitcham and Wimbledon Community forums.
- Meetings were held with Sustainable Communities and Transport Partnership, Mitcham Partnership and Merton Youth Partnership.
- A report to Borough Plan Advisory Committee on the 22\textsuperscript{nd} October 2009 informed members of the progress of the draft Core Strategy consultation, emerging responses and the next steps following consultation.
- The consultation documents were made available at Merton libraries and Merton Civic Centre.
- Respondents were able to provide feedback on the consultation throughout the consultation period.

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<th>Draft Core Strategy Pre-Representations 2010</th>
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<td>- Notification letters and emails sent to all contacts on the LDF consultee database on 10\textsuperscript{th} of August 2010.</td>
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<td>- The consultation material provided details of a dedicated telephone and email address.</td>
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<tr>
<td>- A report to Borough Plan Advisory Committee on 12th October 2010 outlined the initial responses received to the pre-submission publication of the Core Strategy and actions recommended by officers as a result of responses.</td>
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<tr>
<td>- The draft Core Strategy and questionnaire was available in all Merton libraries and Merton Civic Centre.</td>
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Summary of the main issues raised and how these have been addressed

Issues, Options and Spatial Options consultation
November 2005 to January 2007

Key Issues Nov 2005 - Jan 2006 The Council asked Merton's communities what they thought were the key issues for future development in Merton. An interim report on the approach is contained in the Borough Plan Scrutiny Panel Report dated 6th December 2005, which identifies the main spatial planning choices that are expected to be considered in more detail and where there are genuine strategic planning options to consider.

Options Feb 2006 – April 2006 The Council consulted on a series of Options prepared from the Key Issues consultation results, research and guidance. This was accompanied by a sustainability appraisal scoping report on the 6th March 2006. The Borough Plan Scrutiny Panel report and appendices dated 26th June 2006, outlines how this consultation was carried out, provides analysis on the results of the consultation, highlighting potential conflicts, and shows how the results will be taken forward in Merton’s LDF.

Spatial Options Nov 2006 - Jan 2007 The Council consulted on three Spatial Options developed from the previous consultation results, government guidance and other evidence. This consultation was summarised in a context document, which considers the options and alternatives and provides detail of the reasoning behind the choice of Option 3. These options were also assessed by the Sustainability Appraisal. The context document accompanied the June-July 2007 preferred Options document, along with the sustainability appraisal.

Main points from consultation

Town Centres

Key Issues
- Support for strengthening the role and viability of Mitcham, Morden and Wimbledon Town Centres.
- Support greater investment in local town centres.
- Support for enhancing local distinctness and character.
- There was a mixed response to the night economy.
- Support for reduced traffic and increased car parking.

Options
- Support for regeneration of Mitcham and Morden Town Centres.
- Concern raised regarding the capacity of transport infrastructure, out of centre retail developments and car dependence in Colliers Wood.
- Support for new services and businesses, better transport facilities and environmental improvements in Raynes Park, without any intensification of development.
- Support for higher density development in South Wimbledon.
- Support for increased range of retail, commercial and leisure uses in Durnsford Road/Plough Lane and the redevelopment of Wimbledon Greyhound Stadium.
• Support for a wider range of services, increased business opportunities, improvements to the public realm, improved youth facilities and increased focus on local character in Wimbledon.

Spatial Policy Options
• Support for more balanced communities by encouraging growth, regeneration and infrastructure provision in disadvantaged areas.
• Support for reinforcing Wimbledon’s international image and revitalising the town centre. Concerns raised about increasing density and loss of local character.
• Concern raised about over development and loss of employment land to housing in Raynes Park.
• Support for development of local town centres.

Built Environment

Key Issues
• The compatibility of new development with local character raised as a concern. Support for better design, improved public realm and protection of amenity.
• Support for mixed-use developments.
• Support for protection of areas with ‘distinctive quality’ and review of designated conservation areas.

Options
• Support for strengthening design policies and provide a greater focus on local context, reuse of land and crime prevention.
• Concern about the loss of front yards as a result of paving and hard standing.

Spatial Policy Options
• Concern raised regarding the loss of back gardens to development.
• Support for height limit of 6-8 storeys in town centres and 3-4 storeys in residential areas.
• Support for the protection of conservation areas and Character Assessments within conservation areas.

Housing

Key Issues
• Preference for mixed-use developments and improved environments.

Options
• Support for affordable housing and target of 50% affordable housing for new developments. There was no consensus on the threshold at which developments should provide affordable housing.
• Views expressed that affordable housing should be balanced with general housing supply and comprise a mix of housing types and densities.

Spatial Policy Options
• Views expressed recognising the value of mixed residential schemes in terms of types and sizes. Low-density housing schemes were a concern for some respondents.
• Support for limiting the concentration of affordable housing.
• Concern raised regarding the viability of affordable housing and the continued supply of affordable housing in high value locations.
- Support for new housing developments to be located in areas with adequate infrastructure.
- The prioritising of brownfield site developments.

**Transport**

**Key Issues**
- Support expressed for sustainable modes of transport and the extension of public transport to areas with low accessibility.
- Support for better traffic management and improvements to road network to reduce congestion in town centres.

**Options**
- Support for sustainable transport and facilities for walking and cycling.
- Limited support for further restrictions on car use.

**Spatial Policy Options**
- Specific requests for station upgrades at Eastfields and Haydon’s Road and the extension of the easting tram-link to Mitcham and Morden Town Centres.
- Support for the reduction of ‘through-traffic’ in the borough.

**Social Provision**

**Key Issues**
- Concern about the impact of new development on existing services. Services should be expanded to meet increased population demand.
- Demand for increased hospitals, health and fitness facilities.
- Concern about declining social infrastructure and increasing demand.
- Support for protecting existing services and providing a wider range of community facilities.

**Options**
- Support for redevelopment of existing sporting and leisure facilities and better management and coordination of existing facilities.
- Support for new social services and facilities to be co-located in areas accessible by public transport.
- Support for community facilities, such as halls, to be integrated with residential areas.
- Support for increased youth facilities.
- Some respondents highlighted the need to prioritise informal recreation space.

**Spatial Policy Options**
- Support for greater provision of local services to improve accessibility.

**Open Spaces**

**Key Issues**
- Support for the protection of all forms of open space, retention of mature trees and wider protection of trees through Tree Preservation Orders.
- Support expressed for better and more creative use of open spaces, improvements to existing sporting facilities, increased maintenance and improvements to the design and visibility of open space.
- View expressed concerning the need to regulate pitch sports near residential areas to reduce potential conflicts.
• Views expressed that open space not in private use should be open and accessible to the public.
• Support for ‘enabling development’ policy.

Options
• Support for the protection and improvement of the quality of existing open spaces and increased provision of open space.
• Support for regeneration and maintenance of existing buildings and facilities.
• Policies to protect and enhance open space links and corridors supported by English Heritage.
• Support for improved access to open space.
• Support for open space to be integrated with community buildings.
• Support for leisure facilities to be permitted in some areas to make better use of open space.
• Demand for designated cycle paths in open spaces.
• Support for conservation and enhancement of biodiversity and sympathetic management of sports grounds and formal parks.
• Support for the protection of SINCs.

Spatial Policy Options
• Support for the protection of existing parks, greens, commons and other open spaces and the use of open space for walking and recreation.
• Support improvements to open space to provide increased benefits for recreation and biodiversity.
• Need for improved access to natural open space in particular areas of the borough.
• Views expressed requesting improved green links in parts of the borough.
• Concern raised regarding loss of private open space to paving and infill redevelopment.

Environment and Climate Change

Key Issues
• Support for developments to include sustainable drainage to reduce flooding and pollution of waterways.
• Demand for a ‘flood risk assessment’ in parts of River Wandle Catchment area prior to consideration of the extent and location of areas of intensification.
• Support for new developments to include measures to reduce water and power consumption.
• Support for programs to reduce waste and increase recycling.
• Support for collaboration between the Councils to improve waste management.

Options
• English Heritage requested consideration of a more integrated approach to biodiversity in future policies.
• Support for the impacts of climate change to be considered more fully in development.
• Support for all development to be low or zero carbon and installation of renewable energy equipment in commercial developments.
• Concern regarding the visual impact of some renewable energy measures.
• The Mayor of London would like to see more emphasis on air quality.
• Support for measures to reduce water consumption.
• The Mayor of London would like the borough to identify more waste sites.
• Support for sustainable design but less support for recycled building materials.
Spatial Policy Options
- Support for new development to consider the possible long-term risk of flooding and impacts of climate change.
- Support for key objectives required to address the causes and effects of climate change.
- Support to improve the energy efficiency of existing housing stock.
- Support for the use of ‘buffer zones’ and ‘water efficiency measures’ as environmental improvements.

Employment

Key Issues
- Support for the establishment of small businesses and increased retail employment opportunities in the borough.
- Need to generate local employment in the borough.
- Lack of support for polluting industrial activities and industries with heavy vehicle movements.
- Demand for increased training opportunities and The Council support for training.

Options
- The comments on employment were captured in the Town Centres section.

Spatial Policy Options
- Support for Morden and Mitcham Town Centres to be the major focus of investment and employment.
- Support for investment in local town centres requiring regeneration.
- Support for larger businesses to establish in Wimbledon or designated employment locations in the borough.

The Council Response to Key Issues, Options and Spatial Options Consultations
Feedback and comments from the Key Issues, Options and Spatial Options were carefully considered, and fed into and informed, the next stage of Core Strategy preparation, which was Preferred Options.
Preferred Options – Main Points from Consultation

11th June – 23rd July 2007

Following on from the Preferred Spatial Strategy, in June-July 2007 the community provided feedback on their preferred options for guiding future development in Merton.

Regeneration

- Support for regeneration of Mitcham and Morden Town Centres and wards in the east of the borough.
- Views expressed for balanced growth of private and social housing.
- Concerns raised about the impact of new development on existing infrastructure.
- Support for the protection of employment land. Redevelopment of employment land should involve mixed-use developments.
- Support for development of local centres.
- Support for design led approach.
- GLA felt that the policies were not locally distinctive.
- Request to include reference to ‘Areas of Distinctive Quality’.
- Demand to improve Morden and Colliers Wood/South Wimbledon Area of Intensification.
- Concern over expansion of Wimbledon Town Centre and increase of bars/clubs.
- Request to upgrade Colliers Wood to ‘District Centre’ and Wimbledon Chase to ‘Local Centre.
- Support for encouraging small independent food retailers across the borough.

The Council Response:

- The policy has been reworded to allow identification of town centres based on future research.
- The Core Strategy identifies the main priorities for regeneration in Morden and Mitcham Town Centres.
- There are no plans for expansion of Wimbledon Town Centre at the present time. Mixed-use criteria does not mean "more pubs and bars", rather a mix of uses including retail stores, local services and facilities, offices and residential uses.
- The policy sets out an indicative housing mix based upon Merton's Housing Study 2005 and Waiting List data which seeks to address the Council's objective of creating socially mixed communities and greater housing choice.
- Employment land is protected in the Core Strategy to ensure opportunities for local jobs and services that contribute to the Wandle Valley corridor employment reservoir.
- Policy 14 refers to 'Distinctive areas of the borough', which provides a framework for identifying character and assessing the appropriateness of development.
- The Council has undertaken an urban design study of the Colliers Wood/South Wimbledon Area for Intensification to assess capacity for new development and associated infrastructure needs for future development.
- Policies revised to increase their local distinctiveness.

Housing

- Support for affordable housing target, tenure mix and density to be in accordance with Regional Plan and evidence base.
- Strong resistance to development in back gardens and conversion of family housing into flats.
- Concern about progressing to the examination process without a Site Allocations Document.

The Council Response:

-
- The borough wide housing target and tenure split are consistent with the London Plan and underpinned by robust up to date strategic and local housing need assessment.
- There is no statutory requirement to produce the Sites Specific Allocations DPD in parallel or conjunction with any other DPD(s). Merton's Annual Monitor Report (AMR) robustly sets out Merton's projected housing provision to meet its strategic housing target. The AMR is updated on an annual basis.
- Merton’s Housing Needs Study indicates a need for both family housing and flats. The policy attempts to provide a mix of housing types, sizes and tenures to meet the needs of all sectors of the community.
- Policy 3.5 Quality and design of housing developments and paragraph 3.28 of the London Plan consultation draft Oct 2009 supports presumptions against development on back-gardens where locally justified. Merton’s Core Strategy Open Space Policy requires any proposals for new dwellings in back gardens to be justified against a number of factors including local context and character and biodiversity value.

**Open Spaces**

- Support for biodiversity and protection and enhancement of open spaces.
- Concerns raised about the lack of improvements identified for open space in the east of the borough and the east west links.
- GOL suggest including a reference to the Wandle Valley Regional Park.

**The Council Response:**
- This section has been revised to strengthen the protection and enhancement of biodiversity and to maximise measures to protect and enhance biodiversity in new development.
- The Core Strategy sets out the principle that all open space will be protected in the borough.
- A reference to Wandle Regional Park has been included.
- The Open Space Policy aims to protect street trees and use Tree Preservation Orders to safeguard significant trees.
- The provision of additional open space will be largely dependent on privately owned and managed open space that is accessible to the public. A target to reduce areas of deficiency in the borough has been included.

**Renewable Energy**

- Support for energy efficiency, renewable energy and district heating with some support to go further than applying a target of 10%.
- GLA suggest the Core Strategy should follow the London Plan’s energy hierarchy.
- More information required on Merton's low carbon strategy and the delivery of the network of district power and heat/cooling and decentralised energy supply.
- Need for stronger policy on flooding and drainage and protection and enhancement of flood defences in line with London Plan.
- Policy should refer to the pattern of waste management facilities contained in the London Plan and increase sites for waste facilities.

**The Council Response:**
- The Council appointed consultants to undertake a flood risk assessment SFRA. A new policy has been added to ensure that adequate infrastructure is in place for developments.
- Policies contained the Core Strategy regarding energy efficiency and renewable energy apply to all developments requiring planning permission.
- There are no flood defences in the borough therefore it is not necessary to include a policy relating to this. Policy is included in Chapter 24 addressing flood management and drainage.

- The infrastructure policy requires infrastructure improvements be completed prior to or in conjunction with any new development where it is felt this is necessary. Sustainable urban drainage (SUD) systems are referred to in the flood risk management policy and new development is expected to implement SUD’s.

- The Climate Change policy has been revised to reflect GLA suggestions and feedback from other consultees concerning the delivery of the network heating district power and heating and cooling and decentralised energy supply. The Climate Change Policy requirements move ahead of national requirements set out in building regulations standards and other initiatives outside of the planning system, such as the Wandle Valley Low Carbon Zone are helping deliver Merton’s low carbon strategy.

Miscellaneous

- Transport section does not focus on east of the borough and lacks local distinctiveness.
- New development should ensure neighbourhood health provision.
- Social infrastructure should be located where there is need and it is viable.

The Council Response:

- The Council has included additional guidance on the implementation and delivery of health provision in the Core Strategy. Community infrastructure will be directed where there is need.
- The improvement of accessibility to the east of Merton is addressed in Core Strategy transport policies.
Draft Core Strategy – Main Points from Consultation

7th September - 16th October 2009

In September –October 2009 the community told the Council what they thought of the draft Core Strategy, which was prepared from responses to the Preferred Options, research and guidance. The choices at each stage, together with research and Government guidance, helped prepare the draft Core Strategy.

Centres Policy

- Request for information on delivery of a District Centre at Colliers Wood.
- Need to encourage affordable retail units and police shops in town centres.
- Clarification of retail capacity in town centres and outside centres.

The Council Response:
- This chapter has been moved to follow the sub-area policies.
- The retail capacity of town centres and out of town centres has been clarified in Policy 7.
- The Council will continue to work with the GLA for the classification of Colliers Wood as a District Centre in the London Plan (Policy 7:17.7)
- Table 17.2 ‘Summary of Town Centre aims’, supports a mix of unit sizes, including smaller units in town centres.
- The Core Strategy policy for Colliers Wood seeks the designation of Colliers Wood as a District Centre in the London Plan hierarchy following the adoption of a masterplan to manage development in Colliers Wood.

Sub-Areas

- Need to improve the clarity of the diagrams and text.

The Council response:
- The spatial maps in the sub-area section for each sub-area have been amended to improve clarity.

Colliers Wood and South Wimbledon Sub-Area

- Ensure policy is clear and deliverable.
- Request for policy to provide cultural/sporting facility, including a new community multi-purpose sports stadium.
- Traffic congestion in the South Wimbledon/ Colliers Wood area.

The Council Response:
- The Council has updated this section to take into consideration the GLA Town Centre Health Check Study (Dec 2009) and the Mayor’s draft replacement London Plan (Oct 2009).
- Policy 13 Open space, Nature conservation, Leisure and Culture, provides support for the provision of a sports stadium in the borough.
- Merton’s Strategic Flood Risk Assessment identifies parts of Colliers Wood as flood prone. The requirements of the London Plan, replacement London Plan, and the Environment Agency guidance has informed the Core Strategy policy on Colliers Wood.
- Supporting improvements to transport infrastructure and reducing congestion in South Wimbledon/Colliers Wood is identified in Merton’s Sustainable Transport Strategy and Local Implementation Plan (adopted Summer 2010). Merton will be working in partnership with TFL.
- The Council will prepare and adopt a master plan to define the boundary for the Colliers Wood/South Wimbledon Area for Intensification and set out how the designation of Colliers Wood as a district centre will be implemented and delivered.
The Council will work in partnership with key deliverers and stakeholders in preparing the master plan.

**Mitcham Sub-Area**
- Issue regarding the extension of existing conservation area in Mitcham Town Centre.
- Need to clearly identify individual housing targets for each sub-area.
- Queries about level of assessment undertaken to determine viability of proposed affordable housing and environmental policies.

**The Council response:**
- The Council has undertaken an Affordable Housing Viability Assessment, which justifies the affordable housing policy.
- The findings of Merton's emerging Economic Development Strategy will be linked to Mitcham and other appropriate studies.
- Reviewing of conservation areas is undertaken via conservation area appraisals. These appraisals include assessments and revisions of conservation area boundaries. Character appraisals and Conservation Area Appraisals inform consideration of boundary revisions. Mitcham Green Conservation Area Appraisal and Management Plan are currently being consulted upon. The Wandle Valley Conservation Area Appraisal is published.
- The Core Strategy provides indicative housing ranges for the provision of additional homes for the period of between 2011-2026 for the sub areas in the borough. A cross reference to the indicative housing range has been included in the Mitcham Sub Area chapter.

**Morden Sub-Area**
- Support for the regeneration of Morden Town Centre but concern about impact on the existing transport network.
- Concern about height of buildings in Morden and improvements to the public realm.

**The Council Response:**
- The Core Strategy Sub Area Policy takes into account the adopted The Council vision for Morden as part of the more Morden regeneration project, and public realm and transport projects planned for the centre. The emerging Morden Area Action Plan will provide in detailed proposals for the regeneration of Morden Town Centre.
- A Tall Buildings Background Paper has been prepared as supporting evidence for the Core Strategy. The Council has liaised closely with English Heritage during preparation of this evidence, which includes guidance on appropriate locations for tall buildings in Morden Town Centre.

**Raynes Park Sub-Area**
- Comments regarding terminology, need for glossary and inconsistency between policy and Delivery and Monitoring section.
- Concern strategy is aspirational and too optimistic for the plan period.
- Need to restrict retail development at Shannons Corner.
- Comments regarding the accuracy and detail of the Raynes Park sub-are flagged up.
- Impact of key redevelopment sites on town centre.
- Future transport projects and conflicts between pedestrians, cyclists and vehicles.

**The Council response:**
- The structure of this section has been revised to address feedback received. The glossary has been updated to ensure that all relevant terms in the document are clear.
- Improvements have been made to the links between the wording of this policy and the Delivery and Monitoring section.
- The Core Strategy Raynes Park Sub-Area Policy restricts further out-of-centre developments at Shannon Corner, where these would impact on viability and vitality of nearby local town centres.
- The sub-area diagram for Raynes Park was reviewed taking into account the received comments regarding accuracy and detail.
- The Core Strategy Active Transport Policy has been amended to prioritise the access and safety of pedestrians, cyclists and other active transport modes.
- The Core Strategy has been updated in accordance with PPS4 and the draft replacement London Plan regarding the approach to out-of-centre development and provides further clarity on the redevelopment of key sites.
- Informed by Merton’s Economic and Employment Land Study (2010), the Core Strategy provides for the protection of employment land and a link to this is included in the Core Strategy Raynes Park Sub-Area Chapter.
- The Core Strategy sets aims to improve, and encourage, all modes of sustainable transport.

### Wandle Valley Sub-Area
- Support for Wimbledon AFC stadium in the borough.
- Suggestions for rewording references to heritage and conservation.
- Linking this section to the Colliers Wood sub-area.
- Request for specific rivers and EU Water Framework Directive to be referenced in the chapter.

The Council response:
- The Core Strategy includes for the provision of a sports stadium within the borough, should any organisation be in a position to develop one; however it does not designate a site specifically for the development of a sports stadium, as this would be inappropriate for a Core Strategy.
- The Council has updated references to heritage assets, conservation, ecology and rivers and improved cross-referencing between Colliers Wood and Wandle Valley sub-areas. The historic elements within the Wandle Valley sub-area are given appropriate importance and recognition in the policy. The policy encourages the protection of heritage assets and raising awareness of heritage in the sub area.
- The links between Colliers Wood/South Wimbledon sub-area and Wandle Valley sub-area have been improved.
- A reference to the EU Water Framework Directive requirements has been included in the Core Strategy.
- The Core Strategy Open space Policy includes a reference to improving access to waterways, including the River Wandle and its banks.

### Wimbledon Sub-Area
- Need for increased sporting facilities and civic hall in Wimbledon.
- Concern about focus on retail and key development sites without clear direction.
- Support for smaller, independent retailers and a balanced level of night trading.
- Support for new developments to be compatible with residential character.
- Request for plan delivery milestones in the ‘sub-area delivery and monitoring’ section.

The Council response:
- The policy is more concise and provides clear direction on building heights, public realm and the vision for Wimbledon.
- Table 17.2 ‘Summary of town centre aims’, includes aims to strengthen the range and quality of shopping and support a mix of unit sizes, including smaller units.
Table 17.2 promotes a balanced, safe and attractive evening economy through a mix of uses.

- The strategy encourages development on key sites within the town centre boundaries, while protecting the low scale residential character in surrounding neighbourhoods.
- The Council supports the provision of additional sporting and community facilities where there is a demonstrated need.
- The policy has been strengthened to provide more direction and demonstrate a clear vision for the future development of the centre. This required information on the development of the town centre, development of tall buildings and key development sites, protection of the town centre from encroaching development and linking the policy back to the Centres Policy in encouraging a mix of retail units, including smaller units in the centre.
- The delivery and monitoring section of the Wimbledon sub-area has been updated.

**Design**
- Request for further consideration of tall buildings, dwelling conversions, design quality, heritage, borough character, housing quality and London Housing Design Guide and evidence bases.

**The Council response:**
- The tall buildings policy in the Core Strategy is consistent with national and regional planning policy. References to tall buildings have been updated in this section in line with recommendations from the GLA, English Heritage and Merton’s evidence bases and research.
- The justification in the Core Strategy Design Chapter has been updated to include reference to the minimum space standards detailed in the London Housing Design Guide.
- In the Core Strategy Design Chapter emphasis has been added to sustainable development, designing out crime and ‘secure by design’ standards.
- Policy CS14 sets out urban design principles to guide future development in the borough and protect and reinforce local distinctiveness.
- Policy CS14 promotes the conservation and enhancement of the historic environment, high quality design standards for all new development and public realm enhancement.
- The justificatory text to the policy has been updated to include reference to PPS15 Consultation Draft and English Heritage Conservation Principles - Policies and Guidance, and the Council has considered the impact of PPS15 on the Design Policy.
- The Dwelling Conversions Background Paper was available on the Council's website during the Core Strategy consultation period, and the paper is one of the factors that has informed the Core Strategy Design Policy CS14.

**Climate Change**
- Support for climate change policy to be more stringent.
- Concern over lack of reference to broader climate changes issues and no minimum requirement for the Code for Sustainable Homes.
- Improved reference to London Plan, particularly Energy Hierarchy concept of development design, and the need to prioritise site-wide district CHP and CCHP systems.

**The Council response:**
- A key objective of the Core Strategy is the mitigation and adaptation to climate change. The Policy sets out the requirements that all minor and major development need to demonstrate toward meeting this objective.
Policy CS15 requires all new dwellings to achieve Code for Sustainable Homes Level 4.

The Core Strategy addresses broader climate change issues such as flood management and protection of open space. Whilst the planning system has a role to play in climate change, mitigation and adaptation is largely dependent on a number of strategies, initiatives and guidance outside the planning system.

The references to energy efficiency, use of renewable energy and low carbon energy sources in Policy 15 have been reordered to conform to the energy hierarchy set out by the Mayor.

The Council recognises the importance of CHP and community and district power networks. Including this detail in the Core Strategy would result in replication with the London Plan and should be reserved for the Sustainable Design and Construction SPD.

**Flood Management**

- Request for the inclusion of additional measures for flood risk emergency planning and risk mitigation.
- The section should recognise the EU Water Framework Directive requirements and consider change of policy title.

**The Council response:**
- Policy 16 – ‘Flood Risk Management’ provides additional measures relating to flood risk emergency planning and risk mitigation.
- The requirements of the EU Water Framework Directive have been included.
- Policy 16 provides that the Council will implement sustainable drainage systems (SUDs) across the borough and work towards effective management of surface water flooding.
- Policy 11 requires infrastructure improvements be completed prior to or in conjunction with new development, where necessary.

**Waste Management**

- Concern regarding consistency between policies in the Core Strategy and partner boroughs involved in the South London Waste Plan.
- Request for waste apportionment figures in the draft replacement London Plan to be identified in the Core Strategy or the South London Waste Plan.

**The Council response:**
- The Core Strategy Waste Management Policy provides for the identification of the necessary capacity in collaboration with neighbouring South London boroughs to achieve the level of self-sufficiency, and meet the apportionment tonnages set out by the London Plan for South London.

**Open Space, Nature and Recreation**

- Support from Wimbledon AFC supporters for a sports facility in the borough.
- Request for clarity in relation to the development of open space for education facilities, managing and enhancing waterways, encouraging wildlife movement through ‘green corridors/islands’, protection of trees and protection of back gardens and backland from development.
- Queries whether the targets and indicators set out in Table 1 are achievable and realistic.

**The Council response:**
The Core Strategy Open Space Policy outlines the criteria that any educational establishment must satisfy to build on open space.
The Core Strategy Open Space Policy supports the protection of street trees and the use of Tree Preservation Orders to safeguard significant trees.
The indicators and targets in Table 1 have been reviewed to ensure they are achievable and realistic.
Referencing has been included to clarify issues regarding allotments, managing and enhancing Merton’s waterways, trees and encouraging wildlife movement through green corridors/islands.
The Core Strategy includes for the provision of a sports stadium within the borough, should any organisation be in a position to develop one; however it does not designate a site specifically for the development of a sports stadium, as this would be inappropriate for a Core Strategy.
Revisions to Core Strategy included making reference to improving public access to waterways, including the River Wandle.
Merton’s Core Strategy Open Space Policy requires any proposals for new dwellings in back gardens to be justified against a number of factors including local context and character and biodiversity value.
The Core Strategy was revised to make reference to green islands/corridors to encourage wildlife friendly habitats and enable safe movement.
The Core Strategy aims to maintain and improve the publicly accessible open space network in the borough including existing allotments.

**Housing**
- Support for the protection of back lands and gardens from development.
- Relevant evidence bases to support policy.
- Consideration of updates to national and regional guidance.
- Identification of specific areas for housing development.

*The Council response:*
- The borough wide housing target and tenure split requirements are consistent with the London Plan and underpinned by robust up to date strategic and local housing needs assessment.
- The Council has considered revisions to housing policies and taken into consideration changes to national and regional guidance for topic areas such as backland development, housing density matrix, potential new housing delivery target and the affordable housing target.
- A number of evidence base studies underpin the Core Strategy including Merton’s Affordable Housing Viability Study (2010), The London Strategic Housing Land Availability Assessment and Housing Capacity Study (2009), Merton’s Strategic Housing Market Assessment (2010 –in progress) and the South West London Strategic Housing Market Assessment (2010 – Final Draft).
- Merton’s Core Strategy Open Space Policy requires any proposals for new dwellings in back gardens to be justified against a number of factors including local context and character and biodiversity value.
- The Core Strategy Housing Policy sets indicative ranges of additional housing for specific parts of the borough. Other development plan documents such as the Site Allocations Development Plan Document or Area action Plan will identify sites for specific uses including housing and mixed uses.

**Economic Development**
- Support for a more flexible approach to development of employment land.
- Request for an evidence base to identify hotel needs in the borough and suggestion for hotels to be permitted outside of town centres.
The Council response:
- The Council has considered revisions to economic development policies and changes to national and regional guidance, including the Economic Development Strategy (March 2010) and supporting research.
- Merton is identified as having a low level of industrial land relative to demand and the Core Strategy adopts a more restrictive approach to the transfer of designated industrial sites to non-employment uses. Merton’s Employment Land Study supports the ‘restrictive transfer approach.
- Policy 12 directs major retail, office and leisure activities to town centres. Proposals for town centre type uses will be assessed against the guidance and requirements as set out in PPS6 (or any subsequent national guidance), regional policy (London Plan or any subsequent regional guidance) and local policy.
- Policy 12 aims to create new employment by protecting and improving scattered employment sites for small and growing businesses or community uses.

Transport
- Concern relating to connectivity of the cycle network, reduction of on street parking, controlled parking zones, car parking requirements for new developments and accessibility for the mobility impaired.

The Council response:
- The Council did not consider any major changes to the transport policy necessary.
- The Core Strategy highlights the issues and the details that will be considered in depth in the Sustainable Transport Strategy during the next stages.
- The Council is keen to improve the public realm for pedestrian and cyclists. The holistic message of the transport policy is to create a public realm where people choose to use sustainable transport rather than a private car.
- Parking standards will be contained in the new Development Plan Document section of the LDF. Car parking is limited in new development where appropriate PTALs (public transport accessibility levels) are present.
- The Council’s process for the introduction of any traffic management system, including CPZ’s, requires formal consultation. Specific requirements on CPZ’s will be detailed in Sustainable Transport Strategy.

Infrastructure
- Need for ‘social infrastructure’ and ‘local care centres’ to be included in this section.

The Council response:
- The Core Strategy now includes reference to social infrastructure and proposed Local Care Centres and the preparation of an Education Expansion Strategy.
- The Council intends to work with health partners to encourage better healthcare through localised care provision in line with the NHS “Better Healthcare Closer to Home” strategy.
- A reference to local faith communities has been included in relation to social infrastructure.

Monitoring, delivery and implementation
- Need for greater connection between policies and monitoring section.

The Council response:
- This section, and the tables relating to each policy, has been updated.

Infrastructure projects
- Support for the ‘Infrastructure Projects’ table to detail how strategic projects will be delivered, delivery partners involved and potential funding streams.
The Council response:
- In partnership with the Infrastructure and Investment Board, the ‘Infrastructure Projects’ table has been updated with additional infrastructure projects that have emerged between June 2009 and October 2010.
Draft Core Strategy Pre-Submission Representations –
Main points from Consultation

9th August – 30th September 2010

Issues and Opportunities

- The Core Strategy should make explicit links to health planning, health improvement and health protection as a cross cutting theme.
- The sub-areas do not align with current PCT strategies.

The Council response:
- This matter will be considered via a Statement of Common Ground between Merton, The Council and the PCT.
- The sub-areas are indicative and there is no intention to consider these as fixed boundaries or to align with any administrative units.

Spatial Vision

- Sport and leisure is not addressed in the spatial vision.
- The Vision should refer to creating healthier, safer and stronger communities to reflect the themes in the Community Plan, including access to healthcare and other social infrastructure.
- Inclusion of vision statements to promote renewable energy generation and collaborate with partner Boroughs in the South London Waste Partnership to achieve the apportionment targets in London. Future policy should reflect the targets/objectives set down within the emerging London Plan (October 2009).

The Council response:
- Leisure sport and recreation is addressed in Core Strategy Policy CS13 and in the spatial vision.
- Under consideration via a Statement of Common Ground between Merton and the PCT.
- The London Plan is part of the development plan for Merton. The GLA have confirmed that Merton’s Core Strategy is in conformity with the London Plan.

Strategic Objectives

- Concern about lack of flexibility of Strategic Objective 3 and clarification of Strategic Objective 4 to include opportunities for employment, but only where this does not conflict with other policy objectives within the Plan.
- Inconsistency between paragraph 10.3 and paragraph 4.45 of PPS12, which states that Core Strategies should demonstrate deliverability, as well as articulating the overarching vision and objectives for the Borough.
- The strategic objectives do not refer to sports, recreation or leisure.
- The Core Strategy does not address how the Council will facilitate and manage growth, the potential conflict between encouraging growth and protecting urban character and green space, and how conflicts between objectives are to be resolved.
- Recommend objectives to address energy generation and innovative technologies and availability of employment land for small and medium enterprise.

The Council response:
- The objectives are not to be interpreted as planning policy. The Core Strategy should be read as a whole.
- Paragraph 10.3 appropriately advises that while the Core Strategy sets out the overarching vision and objectives, other plans will set the detailed guidance to take these forward which in turn need to be accompanied by their own delivery and monitoring framework. The Core Strategy does clearly set out how each policy will be
delivered, the delivery partners the Council will work with and how the strategic objectives will be delivered and implemented.
- Strategic Objective 5 (d) specifies improving access to facilities for leisure, sport and play.
- The Core Strategy provides indicative growth for residential development, based on a large amount of evidence. Commercial growth is set out in the plan, including Policies CS.7 Centres, CS.12 Economic Development and in the six sub-area policies. These policies, together with CS.11 Infrastructure, CS 14 Design, CS.16 Climate change and CS18-20 transport guide change and growth within the borough.
- The London Plan is part of the development plan for Merton; as such these policies already apply. National or regional policy should not be repeated in local plans.

**Colliers Wood Sub-Area**
- Support for the re-designation of Colliers Wood to a District Centre by Sainbury’s Supermarket. Sainsbury’s supermarket should be included within the Core Shopping Area of the new District Centre.
- Support Policy CS1 (g) and recognition that housing is the primary land use in non-town centre locations within the Colliers Wood and South Wimbledon sub-area.
- Housing development should be promoted in accordance with the London Plan. The Core Strategy should recognise the potential for non-residential sites in ‘residential’ locations, as suitable for residential redevelopment.

**The Council response:**
- Following the adoption of Merton's Core Strategy, a masterplan for Colliers Wood will be implemented and delivered. As a major landowner, retailer and employer in Colliers Wood, Sainsburys will be involved in the preparation of the masterplan.
- Parts of Colliers Wood are flood prone and any proposals for development in Colliers Wood will need consider the flood risk and provide appropriate mitigation measures. The boundary of the Colliers Wood/South Wimbledon Area for Intensification, including the identification of specific sites and details on the level of development expected, will be set out in the Colliers Wood Masterplan.

**Mitcham Sub-Area**
- Figure 12.1 should identify the Key Housing Sites.
- Merton Priory Homes (MPH) supports the approach to affordable housing.
- Need to address the declining reputation of Mitcham.

**The Council response:**
- Figure 12.1 is an illustrative map to demonstrate the Council’s vision for the future development of land. In accordance with PPS12: Local Spatial Planning (2008), the specific names of the sites should not be included to ensure flexibility throughout the plan period.
- Policy 2 aims to improve the quality and mix of homes in Mitcham, including affordable and private housing. Paragraph 12.8 details a number of sites that could come forward within the lifetime of the plan period which are intended to accommodate a large proportion of the housing growth.

**Morden Sub-Area**
- Policy 3(e) should include redevelopment of Morden Road Health Centre.

**The Council Response:**
- Site-specific infrastructure development can be included in the Delivery and implementation section, where funding is available, but is not recommended for inclusion in the policy of a 15-year plan. Refer to draft Statement of Common Ground between Merton The Council and the PCT.
Raynes Park Sub-Area

- The number of new homes is more than can be supported by the amount of land available for development.
- Concern regarding dwelling conversions and suitability of existing dwellings for division into multiple units. The units would not comply with Policy CS14 and would conflict with Policy 5.15 and Policy CS8.
- Concern regarding a specific Strategic Industrial Location (SIL) and consistency with emerging London Plan. Request to allocate the site for mixed-use development.
- Policy CS4 should support the opportunity to regenerate and improve Rainbow Industrial Estate.
- Policy CS4 (f) is not consistent with national policy tests, which require retail development outside of town centres, on non-allocated sites, to be tested in sequential and impact terms.
- The policy should clarify employment uses through reference to Use Classes or the definition of economic development land uses as in PPS4.

The Council response:
- The housing capacity ranges are indicative and provide a guide to the likely distribution of housing capacity across the borough. Robust evidence at regional and local level, including the Mayor of London’s Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity envisaged for Merton over the plan period.
- Policy requirements regarding dwelling conversions are set out in CS14 and apply to suitable sites. This Policy is not inconsistent with Paragraph 14.7.
- Figure 20.1 is indicative and land use designations should be considered from Merton’s most recently adopted Economic and Employment Land Study (2010). There is up-to-date regional and local evidence to show that Merton’s employment land should be retained for continued employment land use.
- No change to Policy CS4 proposed in relation to the regeneration of Rainbow Industrial Estate.
- In relation to Policy CS4 (f) “competes” is used in the context of resisting further out-of-centre development that would have an impact on the vitality and viability of nearby town and local centres. Proposed amendment the Policy to improve clarity.
- Proposed update to Policy CS4 (b) to include a footnote to the definition of employment uses as set out in PPS4 and a link to the economic development chapter in the justification.

Wandle Valley Sub-Area

- The policy should specifically include support for the redevelopment of the Greyhound Stadium for a football stadium.

The Council response:
- Paragraph 21.8 states The Council’s support for the provision of a sports stadium in the borough.

Wimbledon Sub-Area

- Policy 6(h) should include the support and establishment of local transport services.
- Reference to Alexander Road and Tabor Grove should be included in Policy CS6 (g) and figure 16.1.
- Policy does not address how major new development will be accommodated in the town centre without impacting on the town centre or the surrounding area.
- No justification for tall buildings. Policy should limit building height to create a consistent scale of development.
- The Core Strategy does not contain a creative forward plan for Wimbledon Town Centre or Wimbledon Village.
Concern about clarity of Figure 16.1 and the extent of the locations for various land-uses.

- Residential accommodation should be included as suitable use in Wimbledon Town Centre.
- Public realm and pedestrian improvements should be applied to the whole borough and included in Policy CS14 Design.

The Council response:
- No changes proposed to Policy 6(h).
- Policy CS18 (a-d) encourages improvements to pedestrian access throughout the borough. The Council is currently developing a Sustainable Transport Strategy and Local Implementation Plan that will set out the Council’s proposals and provide the mechanism to prioritise pedestrian and access initiatives to be delivered subject to funding.
- Policies CS6 and CS14 set out how Wimbledon Town Centre will accommodate new facilities through the redevelopment of existing sites.
- The Tall Building background paper assesses the suitability of Wimbledon Town Centre for tall buildings. It considers scale and concludes there is potential to accommodate tall buildings complementary to the predominant height of existing buildings.
- In relation to the vision for Wimbledon, the Core Strategy is a borough-wide strategic plan that provides an overarching vision and objectives for each sub-area. It will be the role of other plans to set out detailed guidance to take these forward.
- Figures and maps within the Core Strategy are indicative and show broad policy direction. Specific policy designations are set in Merton’s adopted proposals map (2003).
- Paragraph 16.16 and Table 17.2 considers residential accommodation suitable in Wimbledon Town Centre.
- Proposed change to paragraph 22.31 to include reference to uncluttered design.

Centres
- Table 17.2 conflicts with strategic objective 3.
- Table 17.2 should include an approach to non-retail uses, including those that encourage unhealthy lifestyles (takeaways and betting shops) and community uses to be co-located in accessible locations.
- Paragraph 17.14 is not consistent with Policy CS7 and PSS4. Paragraph 17.14 applies the sequential approach impact test to neighbourhood parades. Annex B of PPS4 does not regard small parades of shops as centres for the purpose of statement.
- There is no justification for the threshold of 280m² for proposals outside of town centres.
- Policy CS7 should be amended to specifically include police facilities and other social infrastructure.
- Policy CS7 and its supporting justification make no distinction between floorspace for bulky goods and other forms of retail more suited to town centre locations. Policy CS7 does not distinguish between new out of town retail development and existing sites in meeting the shopping needs of the borough.
- Support for the re-designation of Colliers Wood to District Centre but the regeneration of Mitcham and Morden Town Centres should not be at the expense of other centres.

The Council response:
- Strategic objective 3 does not conflict with Table 17.2
- Approaches to healthy/ unhealthy uses are underway via a co-coordinated approach with partners. Case law has overtaken planning policies with regard to hot food takeaways and following the adoption of Merton’s Core Strategy, the Council will consider whether specific guidance can enhance this.
In accordance with PPS4, local authorities can consider setting thresholds for edge-of-centre and out-of-centre retail development subject to an impact assessment, including setting geographic areas. The intention for setting the threshold at 280m² is to ensure shops, which meet the everyday shopping needs of residents, are located within walking distance of residents.

It is intended for Merton’s forthcoming Retail and Town Centre Capacity Study and an emerging briefing note with evidence identifying any area’s deficient in local shopping to justify the Council’s policy position further.

In the justification ‘town centre type uses’ are defined as set out in national guidance PPS4: Planning for Sustainable Economic Growth (Dec 2009). Therefore, although not specifically mentioned, ‘police shops’ or ‘social infrastructure’ are covered by the umbrella term ‘other uses’.

The Core Strategy does not state that the regeneration of other town centres will overshadow or be at the expense of other town centre such as Colliers Wood. A Masterplan for Colliers Wood will detail how the designation as a district centre will be implemented and delivered.

**Housing**

- Policy CS8 is inconsistent with national requirements for social housing, built with public funding, to comply with specified minimum floorspace standards.
- No evidence to show that additional housing can be provided in Wimbledon and Raynes Park without impacting on existing character, environmental quality and open spaces.
- Support for flexibility in CS8 (f) regarding affordable housing provision and this should apply to all sites.
- Request for clarity on the location of development sites to enable matching of primary care capacity.
- Current figures on housing affordability should not be included as market conditions are likely to change and render these figures irrelevant.
- Seeking payments from applicants for the cost of independent assessments is not justified and should be deleted.
- Specific conditions are unjustified as they are too restrictive, are contrary to free market principles and will deter development in the private sector by making schemes not viable.
- Support for setting affordable housing targets on private development sites, but should be a flexible approach where no Social Housing Grant is available.
- Support for payment of commuted sums on developments less than 10 units.
- Support for the allocation of 500-600 new homes to Colliers Wood and South Wimbledon. Expectation that the Council will adopt a positive and proactive approach to proposals for residential development in the area.
- Support for housing in sustainable brownfield locations but policy should allow residential development on surplus commercial land.

**The Council response:**

- It is not necessary to include social housing floorspace standards in local planning policies.
- The housing capacity ranges set out for the sub-areas are indicative and provide a guide to the likely distribution of housing capacity across the borough. Robust evidence at regional and local level, including the Mayor of London’s Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity for Merton over the Plan period. The SHLAA took account of deliverability issues and policy constraints such as protection of existing character.
- The flexibility regarding affordable housing provision is clearly set out in point (f) which relates to all affordable housing provision irrespective of the size of the site.
In relation to primary care capacity, no new housing sites are proposed in the Core Strategy; however, the evidence does identify a few sites, which have planning permission or planning intention for new homes. These numbers are reflected in Policy CS.9.

Paragraph 18.29 sets out the justification for seeking affordable housing. It does not set out criteria on which affordability will be judged.

The need for developers to undertake or supply independent viability assessments is only where the developer is contending that their scheme cannot meet the policy requirements of CS.8. This is set out in CS8 (f) and in paragraph 18.20.

Policy CS.8 criterion (f) allows for site circumstances such as site area, site suitability and financial viability and other planning contributions to be taken into account. As detailed in Merton’s Affordable Housing Viability Study 2010, policy CS.8 housing choice is justified.

Merton’s Affordable Housing Viability Study 2010 demonstrates that the Council’s affordable housing requirements are viable without a Social Housing Grant.

The indicative range for Colliers Wood and South Wimbledon of 500-600 new homes is subject to environmental factors particularly flooding. The Council is adopting a proactive approach by working jointly with key stakeholders in the preparation of a masterplan to define the boundary for the Colliers Wood/South Wimbledon Area for Intensification and the re-designation of Colliers Wood.

Paragraph 18.2 encourages housing in sustainable brownfield locations. The evidence base supporting Merton’s Core Strategy has not identified “surplus commercial capacity”. All development proposals will be considered on a site-by-site basis.

**Infrastructure**

- Need to state that other policies in the plan can protect health and promote healthier lifestyles and list them (to reflect Strategic Objective 5).
- Request for policy commitment to undertake Health Impact Assessments for major development in the subsequent development management document.
- Support provision of emergency services as promoted by the Metropolitan Police’s Asset Management Plan.
- Support for reference to flooding from sewers and requirement for infrastructure to be in place ahead of development. Policy should emphasise the importance of forward planning.
- Additional text should be added to confirm that any contributions sought must meet the statutory tests within the CIL Regulations.
- Amendment to policy to allow potential changes to the way in which healthcare is provided.
- General support for additional school provision on open space if locally justified.
- Lack of detail on establishing renewable and low carbon energy saving and request to identify suitable sites for renewables.

**The Council response:**

- Proposed change to Policy CS11 justification to state that all policies play a part in protecting health and promoting healthier lifestyles. This is demonstrated in Policy 8-10, 13, 14, 15, 16, 17 and 18-20.
- Policy CS11 is proposed to be updated to make reference to the use of Health Impact Assessments with major applications.
- Proposed addition to justification to emphasise need for forward planning regarding water infrastructure planning.
- Paragraph 19.3 refers to national legislation and during the lifetime of the Plan, planning obligations will be consistent with the most recent legislative criteria.
In relation to healthcare provision, this is under consideration as part of Statement of Common Ground with PCT.

In relation to educational establishments, retain policy wording under open space CS13.

- The principles for renewable and low carbon energy are set in Policy CS.15 and the London Plan.

**Economic development**

- Strategic Objective 4 needs to recognise the health benefits of employment and issues related to unemployment.
- Support for the use of surplus scattered employment sites for community facilities, particularly policing.
- Policy CS12 (a) is not flexible as it lists economic employment jobs. Policy should be consistent with PPS4, which includes B Use Classes, public and community uses and town centre uses in the economic development policies. Policy CS12 should include sui generis uses and full range of B Use Classes.
- Policy CS12 should incorporate policies to manage and improve industrial land, provide sufficient land and infrastructure for enterprise and start-up businesses and identify Strategic Industrial Locations and Locally Significant Industrial Locations as suitable for ‘waste management facilities’.
- Support for redevelopment of sites no longer suitable for employment use. Specific criteria for redevelopment should be included in the Policy.
- Proposed designations of Locally Significant Industrial Sites are not founded on a robust evidence base.

The Council response:

- In relation to strategic objective 4, refer to item 13 of the PCT and NHS Statement of Common Ground.
- As a footnote to criterion reference is made to the definition of employment as defined in PPS4; Planning for Sustainable Economic Growth (2009), which includes reference to entertainment, culture and tourism.
- Policy CS12 plans for all types of employment, including small and medium enterprise. Policy CS17 deals with Waste Management and Merton is currently working with the neighbouring boroughs to prepare the South London Waste Plan.
- The Core Strategy only allows for redevelopment of non-designated scattered employment and community sites that are no longer in use for employment or community purposes and located in areas not appropriate for such uses.
- Merton’s Economic and Employment Land Study 2010 supports the protection of Locally Significant Industrial Areas and Strategic Industrial Locations for continued employment uses. There is up-to-date regional and local evidence showing that Merton’s employment land should be retained for continued employment land use.

**Open Space**

- Policy change to allow alternative leisure and recreational activities on unviable sites and encouraging exercise as part of everyday activities.
- Protection of front gardens through the development control process.
- Requirement for tree planting in front and rear gardens as part of development and replacement plantings where planning permission is granted for the removal of protected trees.
- Concern about maintenance and condition of parks.
- Policy CS13 (a) does not set out appropriate uses of MOL and appropriate development.
• Support for development of football stadium at the Greyhound Stadium and inclusion in Policy CS13 (i).
• CS13 should provide improvements to health and well being by access to open space, nature conservation, leisure and culture. The policy does not refer to deficiencies in open space provision.
• The potential for tourism on the River Wandle and recreational fishing at Wandle, Cannon Hill Common, Wimbledon Park and Mitcham common has been missed.
• There should not be an exception for educational establishments on open space.
• Policy should require a minimum percentage of development sites to be retained for nature and/or food production.

The Council response:
- Proposed amendment to include front gardens in the delivery and monitoring section and reference to the Government guidance on the permeable surfacing of front gardens (May 2009) in Paragraph 21.5.
- Landscaping and tree planting are conditions/obligations determined on a site-by-site basis. Currently there is no provision to fund or enforce the proposal for replacement tree plantings.
- Detailed management of the Council owned open space is dealt with through other corporate strategies
- MOL is managed under national (PPG2) and regional policy (London Plan) guidance. The MOL policy in the UDP will remain until a development plan document prepared following adoption of the Core Strategy. CS13 states that opportunities in culture, sport, recreation and play will be promoted and support for new and improved facilities.
- The Core Strategy supports sporting facilities but does not prioritise or promote any particular club or sporting activity. Site proposals deal with specific allocation of sites. Consideration of football stadium proposals is not appropriate for inclusion in Section (i) of Policy CS13.
- The exception for educational establishments from general protection of open space is to meet the need to expand and secure sites for additional school places. The loss of open space to educational establishment will need to be justified on the basis of the needs identified in (i).
- In relation to improvements to health and well being, these issues will be addressed in the PCT and NHS Statement of Common Ground Oct 2010.
- Core Strategy Policy CS13g. (vi) refers to leisure and recreation use of Merton's waterways.
- In relation to retaining site area for open space, quantity of open space is not the only consideration. Other considerations such as access, design, proximity to open space, and site area are dealt with on a site-by-site basis.

Design
• The list provided to achieve high quality design is inadequate and should be extended to cover overshadowing, privacy, scale, building lines and setbacks.
• Maximum heights should be specified in each Town Centre.
• Policy CS14 should not preclude landmark buildings and innovative design solutions in appropriate locations.
• Policy should include flexibility to consider site-specific variations when assessing the appropriateness of tall buildings.
• Definition of unnecessary needs to be clarified in relation to demolition of existing housing stock.
• Core Strategy separates the approach to highway upgrades, street furnishings, signage and advertising from the planning process. A programme for assessment of
the quality and success of highway design, street furniture and signage should be undertaken in all areas of the Borough.

- Policy should include requirements for improving design standards, particularly de-cluttering.
- Protection of front gardens from development.
- Minimum space standards impose unreasonable and impracticable restrictions on private development. The requirement should apply to social housing only.
- Needs to outline the role of good design in offsetting negative environmental and health impacts and creating healthier communities.

The Council response:
- The list of specific design considerations is recognised in CS.14, including paragraphs 22.9, 22.24.
- Specific building heights are not imposed in a strategic policy as it could compromise design principles. The policy has been developed in conjunction with English Heritage, and is supported by robust research set out in the Tall Buildings Background Paper.
- The policy does not preclude landmark buildings or innovative design. A certain degree of flexibility is embedded in the policy via terms such as ‘unlikely’ and ‘may’.
- The Core Strategy is supported by evidence, which identifies appropriate and inappropriate locations for tall buildings. The word ‘unlikely’ provides the opportunity for sound justification to be submitted to demonstrate how a proposal is acceptable and impacts have been mitigated.
- Proposed update to policy to clarify intent in relation to demolition and remove reference to “unnecessary”.
- A reference to the Street Scene Design Guide 2008 is proposed to be added to the Key Divers Box.
- The government will complete its research into street furniture in spring 2011. The Council’s Street Scene Design Guide (2008) will be used as a reference for the Council and its partners in future schemes, and includes a strong commitment to de-cluttering.
- The loss of front gardens to parking is permitted development. The Councils have the ability to restrict this right in conservation areas, however this is a development issue and is more appropriate dealt with in the Development Management document rather than the Core Strategy.
- The draft replacement London Plan sets minimum space standards for all new dwellings. The justification for setting minimum space and quality standards in the Core Strategy is contained in paragraph 22.15.
- In regards to issues raised concerning health and social inclusion, this is addressed in the PCT and NHS Statement of Common Ground.

Climate Change

- Policy CS15 does not provide sufficient flexibility and it should not be necessary to demonstrate compliance with the policy criteria if it is not feasible.
- Insufficient justification for compliance with Code Level 4.
- Item (e) is inadequate for a Plan with a 15-year timescale. Government policy is that housing should meet Code 6 standard by 2016.
- There is no policy to reduce the amount of energy imported into the Borough.
- For most large developments it is unrealistic to expect 10% of energy requirements to be produced on site from renewable energy sources. Policy should encourage the use of renewable energy and require buildings to incorporate thermal insulation.

The Council response:
- The Council considers that issues of feasibility are adequately covered in CS15.
Evidence, including the study "Viability of Code for Sustainable Homes in Merton" 2010, demonstrates that Code 4 is generally viable across Merton. Policy CS.15 provides flexibility to demonstrate lack of viability on a site-by-site basis. The Council will continue to assess the viability of higher levels of sustainable design and construction standard. Where evidence suggests that higher levels are viable, these will be introduced.

Looking ahead to the implementation of the allowable solutions, the Council will expect all onsite emissions reduction to be exhausted before examining any offsite emissions reductions through the allowable solutions.

Merton's Core Strategy does not contain a specific target for any types of development regarding the production of on-site renewables.

**Flood Risk Management**

- Policy is too weak and should include requirement to implement measures to mitigate flood risk.

*The Council response:*
- Proposed change to policy to ensure the implementation of measures to mitigate flood risk.

**Waste Management**

- The justification refers to waste minimisation, but not referenced in the Policy.

*The Council response:*
- Matters regarding waste minimisation and its use as a resource are addressed in the policy’s support of government and regional planning policy. This will be addressed in more detail in the South London Waste Plan.

**Transport**

- Request to include additional indicator in Table 28.1, clarification of policy and reference to the Greenways Network.
- Monitoring framework should include monitoring physical activity as part of everyday activity.
- Policy should provide for increased footpath links and improvements to existing routes.
- Inclusion of Policy to encourage creation of first class public transport interchange at Wimbledon Station and protect existing bus stations and facilities.
- Policy should address traffic speeds, safety and noise, particularly in residential areas.
- Clarification of transport projects and funding sources.
- Permit free agreements are not justified and are discriminatory to new developments.
- Policy CS19 (d) is onerous and a deterrent to new development as increasing sums are required to be paid to the local authority as educational, open space and transport contributions, making many schemes uneconomic to build.
- Delivery and Monitoring, Paragraph 2, should be amended to include cycling.

*The Council response:*
- Proposed amendment to Table 28.1 to include car trips as indicator, proposed rephrasing of the policy to clarify intent and proposed reference to the Greenways Network.
- Policy CS18 Part (a)-(d) adequately encourages improving all pedestrian access throughout the borough. The Council is currently developing a Sustainable Transport Strategy and Local Implementation Plan that will sets out the Council’s proposals and provide the mechanism to prioritise pedestrian and access initiatives to be delivered subject to funding.
Policy CS19 (g) & (i) adequately provides the mechanism to encourage improvements to station and bus services in the borough and Policy CS6 (h) refers specifically to Wimbledon. The Sustainable Transport Strategy and Local Implementation Plan will include details on how the Council will continue to work with local and regional partners to deliver public transport improvements.

Policy CS20 (a)-(e) adequately addresses traffic issues and is supported for each sub-area policy. Policy CS18 addresses access and safety throughout the borough.

Proposed amendment to clarify transport projects and funding sources in the Delivery and Monitoring Section.

In relation to permit free parking, the policy is proposed to be amended to improve clarity. Permit free development is typically applied when existing parking is at a premium and there is good public transport provision in the locality.

Legislation sets out the criteria for planning obligations. This policy is to clarify that the Council intends to seek obligations in connection with sustainable transport.

Proposed amendment to P168 Delivery and Monitoring Paragraph 2 to include cycling routes.

**Delivery**

- Paragraphs 27.2 — 27.9 do not sufficiently recognise the importance of local community groups.
- The discussion of Wimbledon Town Centre does not include a Business Improvement District or new Performance Space/Civic Hall.
- In Table 27.2 no cost estimates are given for items 7, A, B, F, H and no mention of reduced energy use or proximity lighting in items 8(b) and (c).
- Clarification required regarding the timing of transport projects and proposed funding sources.

**The Council response:**

- Table completely revised and updated from 30th June 2010 - to continue until January 2011.

**Monitoring**

- The monitoring framework for strategic objective 5 needs to be broadened to reflect the full scope of the strategic objective for increasing public health and wellbeing, reflecting the 5 priorities set out in the objective.
- The monitoring framework for strategic objective 7 should also include monitoring impact on increasing everyday physical activity.
- Reducing car trips should be included as a monitoring indicator in Table 28.1.

**The Council response:**

- Refer to item 17 of the PCT and NHS Statement of Common Ground Oct 2010.
- In Policy 18 and strategic objective 1 in Table 28.1, an additional indicator is proposed to reduce number of trips made by car.