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1.0 INTRODUCTION

1.1 David Lock Associates were commissioned in March 2010 to undertake a ‘critical friend’ review of the draft submission version of the Merton Core Strategy. The Core Strategy is currently being prepared for consultation prior to submission to the Inspectorate; the Council wishes to obtain a review of the document prior to publication so that it can ensure that the document is as robust as possible.

1.2 We were asked to focus on the content of the Plan rather than on procedural issues: the Council is confident that the legal requirements have already been satisfied. We were also advised that the Council is confident that a robust evidence base is in place and that all appropriate consultations with statutory stakeholders and other delivery partners have been undertaken.

1.3 To ensure that our review focuses on the key requirements of the plan-making process, we have used Planning Policy Guidance 12: Creating strong safe and prosperous communities through Local Spatial Planning as a checklist for the work, together with our own experience of how this is applied in the plan-making process.

1.4 Our overall conclusion is that the Core Strategy is sound but that the document would benefit from some re-formatting and re-drafting to provide clarity and emphasis to the policies, and to demonstrate that the work undertaken responds positively to the requirements of the current plan-making system.
2.0 CHAPTERS 1-4

Chapter 1: Foreword

2.1 This should be from the portfolio holder for plan-making or the Leader of the Council and it should just be titled ‘Foreword’ not ‘Foreword from Councillor’. Conventionally, this should not have a chapter number as it is not formally a part of the document.

Chapters 2-4: Introduction and Background

2.2 This section contains three very short chapters i.e. Introduction and Purpose (Ch 2), Consultation (Ch 3) and Sustainability Appraisal (Ch 4). These would benefit from being amalgamated into one longer chapter (i.e. a new Chapter 1 entitled Introduction) or two chapters where the content is very clearly separated out into either matters relevant to the submission version of the Plan or to earlier stages. At present, there is considerable repetition between Chapters 2 (Introduction and Purpose) and Chapter 3 (Consultation) in so far as the current consultation requirements and procedural steps are concerned. Chapter 4 (Sustainability Appraisal) is too short to justify a separate chapter and in any case the SA work should be seen as being embedded in the Plan preparation process rather than as a separate activity.

2.3 Alternatively, Chapter 1 Introduction should focus exclusively on the final version of the Core Strategy and the consultation opportunities associated with this (a flow diagram could usefully be used to illustrate this process). A separate chapter (Ch 2 Background) could describe the previous consultation events, the SA process and the fact that these have shaped the current version of the plan (again a flow diagram could be produced to show the relationship between the various strands of activity). There would then be clear separation between what response is needed now and what has happened in the past.
3.0 CHAPTERS 5-11: MERTON’S VISION AND OBJECTIVES

3.1 This is an important section of the plan because this is where the Council demonstrates that it has followed a logical and evidence-based programme of work from identifying the nature and characteristics of the Borough, through the identification of issues and opportunities, to the establishment of an appropriate vision for the area, and the objectives and policies that will be used to deliver that vision. PPS12 states that the new planning system “both offers, and requires, the development of a stronger leadership role for local authorities and elected members, built on collaboration through LSPs and accountable delivery through LAAs” (paragraph 1.6).

3.2 It also states that at the heart of the new development plan process is the idea of place-making. Specifically, PPS12 states that local authorities have a key role to play in leading their communities, creating prosperity and fostering local identity and civic pride. “…by providing civic leadership, local authorities help to bring together the local public, voluntary and community sectors together with private enterprise in order to create a vision of how to respond to and address a locality’s problems, needs and ambitions and build a strategy to deliver the vision in a coordinated way” (Paragraph 1.1) An essential part of this process is the preparation of the Sustainable Community Strategy (SCS), the establishment of a Local Strategic Partnership (LSP) and the use of a Local Area Agreement (LAA).

3.3 PPS12 states that the Sustainable Community Strategy sets out the strategic vision for a place and is linked into overarching regional strategies. It provides the vehicle for considering and deciding how to address difficult crosscutting issues such as the economic future of an area, social exclusion and climate change (PPS 12, paragraph 1.2).

3.4 PPS12 also states that the Core Strategy must similarly be aligned with national and regional policies, in this case the London Plan.

Chapters 5-7

3.5 It is clear from the text of the Merton Core Strategy that this context has been taken into account in the preparation of the Plan as there are frequent references throughout and much of the information is contained in Chapter 7: Key Drivers and Evidence Base. It would be helpful, however, to pull together all of this information in a separate chapter called ‘Policy Context’. This would help to emphasise the integrated and hierarchical nature of the plan-making process and to demonstrate that the Core Strategy complies with the higher order plans.

3.6 First, the ‘Policy Context’ chapter should describe the policy framework within which the Core Strategy has been prepared. This should:

a) State unequivocally that the policies of the Core Strategy have been prepared so that they are in conformity with national planning policy – there is no need to list the various PPGs and PPSs - just make the statement that they have been taken into account in the Plan preparation process.

b) Set out the key messages from the London Plan - the ‘regional’ context. Although the Core Strategy should not repeat the provisions of a higher order plan, a brief summary of the key messages sets a helpful context for the Council’s strategy. This is already done later in the Core Strategy (in Chapter 7 Key Drivers and Evidence Base) but we consider that the policy framework should be separated out from the evidence base and placed earlier in the
document so that it clearly sets the context within which later work has been undertaken. The information could be set out as a series of bullet points, organised into two groups, a first set identifying the key messages from the thematic policies of the London Plan, and a second highlighting specific requirements for Merton.

c) Highlight the key themes of the Merton Community Plan, setting out the overall vision and priorities, and explaining how these are to be delivered through the objectives of the core Strategy. Demonstrating that the Core Strategy has been prepared taking into account the vision and objectives of the Sustainable Community Plan, the work of the Local Strategic Partnership and the Local Area Agreement is an essential part of the plan-making process. Again all of this can be expressed in the form of bullet points so that the focus is very much on the key messages rather than the detail of the higher order documents. Again, this is already done in other parts of the Core Strategy although in such a way that the logical, hierarchical process is less easy to ascertain.

d) Identify other relevant local strategies that have been taken into account in preparing the Core Strategy – the spatial planning system is very much focused on the integration of various streams of Council activities and the Core Strategy needs to demonstrate that these have been taken on board. An up-front statement that this approach has been integral to the preparation of the Core strategy allows the Council to demonstrate compliance. The various documents do not need to be described in detail, they could just be listed here or in an Appendix (they are already listed in the area-based and thematic chapters). Emphasising this work up-front gives emphasis to the hierarchical nature of the work that has been undertaken and helps to demonstrate conformity with other policy document and Council work streams. The phrase ‘key drivers’ could be retained in this context as a clear demonstration that the Core Strategy focuses on these.

3.7 Second, PPS12 states that the vision should be informed by an analysis of the characteristics of the area and its constituent parts, and the key issues and challenges facing the local planning authority. To demonstrate clear compliance with this process, elements of Chapters 5 (What makes Merton a Unique Place?) and 7 (Key Drivers and Evidence Base) could be brought together in a new chapter to provide a clearer, and evidentially supported, pen portrait of the Borough. We would suggest that this chapter should state at the outset that the policies of the Plan are derived from a detailed analysis of characteristics of the borough and that evidence has been obtained to support policy formulation as necessary. The various studies that have been undertaken should be listed here (or referred to as being in an appendix) to demonstrate the robustness of this work.

3.8 It would be helpful if the description of the Borough as existing could be organised under a series of generic sub-headings e.g. location, character, population, housing, social (e.g. levels of deprivation), economic issues (e.g. employment profile), environment (e.g. major public spaces, areas of deficiency), transportation (e.g. key routes/connections), retailing (e.g. town/district/local centres), health, education, etc. – all of this will help to provide an understanding of where change is needed and to provide justification for the policies of the plan at a later stage.

3.9 It would also be useful to include here:

a) a plan showing the main features of the Borough e.g. strategic open spaces, town/district/local centres, strategic transportation routes, etc.;
b) the PTAL analysis that is used later to support the land use and density policies of the plan; and
c) the character areas plan that is used to support the sub-areas analysis.
3.10 The first of these is a useful reference point in a plan that is spatially-focused; the latter two have a fundamental influence on the policies of the plan and the way in which area-based policies are focused. The Core Strategy needs to show that these have a sound evidential base.

3.11 On that basis, the Council would be able to establish a clear and logical path between the policy context, the character of the place and issues/opportunities, and putting in place its foundations for policy formulation. The strategic objectives which form the link between the high level vision and the detailed strategy would then expand the vision into the key specific issues for the area which need to be addressed, and show how that will be achieved within the timescale of the core strategy.

Chapter 8

3.12 In terms of Merton’s Core Strategy Vision (Chapter 8) we note that this contains both generic (a, c, d, g, h and i) and specific (b, e and f) aspirations. The Council should consider re-ordering these so that the aspirations progress from the general to the specific; the Council would also be able to demonstrate that the strategic objectives are a natural evolution of the overall vision.

3.13 We note that the vision for the Borough is further expressed in terms of 2-, 5-, 10- and 15-year visions for the future. Whilst it is helpful to have some recognition of the fact that some objectives will take longer to deliver than others, the level of specificity is somewhat greater than would normally be anticipated in a Core Strategy. Given the level of specificity in the two-year vision (as might be expected) we would expect most of the delivery mechanisms to have been already established. We have some concerns that this detail might become rapidly out of date; PPS12 states that the Core Strategy should not attempt to introduce too much detail if there is the risk that the plan will become out of date in this way. If that is the case, the Council should reconsider the inclusion of the more detailed programmes, the key elements of which could in any case be included in lower order supplementary planning documents or in development plan documents if significant changes are proposed.

Chapter 9

3.14 In terms of the Key Diagram (Chapter 9) we would suggest that this is included within the Chapter on Strategic Objectives (Ch 10). It needs to be shown as an illustration of the vision rather than as a free-standing piece of work which is not linked to the text.

3.15 In terms of the content of the key diagram:

a) this could be more diagrammatic than shown – it is clearly based on an OS base plan and it implies that some boundaries might be quite tightly fixed;

b) a notation could be applied to emphasise the re-balancing of the east and west of the Borough (this is implied by the ‘neighbourhood renewal area’ notation but the policy suggests that the Borough is talking about more than area-based renewal programmes – i.e. a fundamental shift in the social, economic and environmental performance – area-based renewal might play a part in this but substantial changes will require more than this);

c) the proposal to secure ‘district centre’ status for Colliers Wood comes across in the text of the Plan as a major priority for the Borough – this needs to come through in the Key Diagram; the ‘create new’ designation does not convey this message, nor does the heading ‘sub-area direction’ carry any meaningful sense (even if this...
categorisation applies to sub-areas overall the focus will be on the town/district centres)

d) some of the notations are different to distinguish – e.g. the railway, tube and tram lines; main roads;

e) (minor point) the ‘urban area’ tone does not appear on the key (just the title is given);

f) the proposed tram and Northern line extensions do not appear to be shown as such;

g) Wandle Valley ‘sub-area’ needs a different name, one that explains what the Council is trying to achieve – i.e. proposed regional park and strategic employment location: saying that it is a sub-area is not very specific.

Chapter 10

3.16 We cannot comment on the detail of Chapter 10 as we have less knowledge of the local area than Council officers but:

a) there needs to be some clarity throughout in relation to the use of the terms town centre, district centre, local centre, etc – see particularly Strategic Objective 3.

b) it seems likely that there will be a significant difference in policy objectives for Wimbledon town centre and Wimbledon village – this does not really come across;

c) Strategic Objective 2 refers to ‘high density’ new homes (and similar references appear elsewhere in the Plan) - this could have unintended consequences – presumably what is meant is ‘higher’ density development in locations where this is appropriate – Merton’s suburban character is one of its strengths and this might need to be protected even where the PTAL ratings suggest that higher density might be appropriate. This type of qualification is used elsewhere in the Plan, particularly in relation to sub-areas, and it would be useful to make the point generally.

Chapter 11

3.17 We note that the purpose of Chapter 11 (Strategic Objectives and Core Strategies Policies Matrix) is to explain how each of the policies relate to the strategic objectives identified in the Core Strategy, and how they contribute to their delivery, but at this stage in the document none of the policies have been described and so it is difficult to understand the significance of the matrix at this point. It would be preferable for this matrix to be placed in an appendix or used as a starting point for the delivery section (with suitable explanatory text).

3.18 On a minor point, the column headings in the table need to specify Policy references to assist in comprehension and legibility of the document.

3.19 The matrix also needs to have a key to explain what is being done (for example, the ‘sunshine’ symbol needs to be explained – presumably this means that there is a particularly strong relationship between the strategic objective and the policy) and/or the text needs to give greater explanation.
4.0 CHAPTERS 12-28: SPATIAL STRATEGY POLICIES

General comments

4.1 We are not as familiar as the Council with the needs of its constituent parts. In the time available, therefore, it has not been possible for us to make a detailed critique of the policies that are recommended for the various sub-areas. We have tried, however, to identify any inconsistencies in the Plan or to highlight areas where the text does give due emphasis to what the Council is trying to achieve. We have previously stated that Chapter 12 ‘Sub-areas’ should be included in the previous section of the Plan.

4.2 We note that the area-based policies are presented before the chapters on generic themes (e.g. housing, transport,) and frequent references are made to later chapters. This makes it difficult to appreciate the overall context within which these sub-areas exist. A more conventional format would be to have the generic policies first, followed by the application and interpretation of these policies in more detailed area-based local strategies. In this way it is easy to understand how a particular strategy for a sub-area contributes to the implementation of the Core Strategy as a whole.

4.3 This re-ordering would also save having to make forward references to later chapters and would provide an understanding of how the area strategies respond to the generic requirements e.g. of satisfying housing and employment numbers.

4.4 It would therefore be more appropriate to present the generic policies on Centres (11), Housing (7-9), Infrastructure (10), Economic development (12), Open space nature conservation, leisure and culture (13), Design (14), Climate change (15), Flood risk management (16), Waste management (17) and Transport (18-20) before the sub-area policies. By avoiding the need for references to forward chapters of the Core Strategy it would be possible to avoid some repetition and would provide a context, in terms of each of the land uses or policy streams, so that the reader can understand how and why the strategies for the sub-areas are being packaged in the way that they are.

4.5 It would also be helpful if the policies could be ordered in a fairly conventional manner i.e. housing, economic development, (retail) centres, transportation, infrastructure, open space, leisure and culture, etc. Given the current emphasis in national and regional policy on sustainable development, however, it would also be legitimate to bring climate change, flood risk management and waste management to the front of the policy section, thereby emphasising their critical role in the development process. In additional, Merton Council has an established reputation in matters relating to sustainability and it would be appropriate to continue to build on this.

4.6 On a minor point, the policies in this section of the Core Strategy should have sequential numbering – some are out of sequence at present.

4.7 An explanation of the colouring used in the word boxes used in each chapter needs to be given – our understanding is that purple sets out the policy, mid-green summarises relevant conclusions of the SA process, light green relates to the evidence base and light brown explains how the policy will be delivered. There is no actual explanation, however, and it is not always clear, particularly in relation to the SA section that this is the purpose of the commentary.

4.8 We would also like to suggest that the plan for each of the sub-areas needs to be better placed within the text to which it relates – it is somewhat out of place at present coming at the start of the sub-area chapter where the emphasis is on policy
formulation rather than specific responses to the issues. In some instances the plans also sit opposite text on another sub-area. If the plan were to come in the middle or at the end of the chapter it could be used by the reader to understand how the more specific proposals are being brought together to formulate a specific strategy for the sub-area.

4.9 The plans are also physically small and there is a lot of information on them, some of which is difficult to read. We presume that, in the final version of the Core Strategy, they will each occupy a full A4 page.

4.10 In all cases the housing numbers are too specific – they should be rounded to the nearest 50 or 100.

4.11 The rationale for the ordering of the sub-area chapters is also unclear. Initially, we suspected that the priority given to Colliers Wood was due to the fact that major interventions are proposed (not least the aspiration to secure District Centre status within the London Plan) but on reflection we realised that the list is in alphabetical order. We would suggest that the sub-areas should be listed in order of size/economic importance with Wimbledon coming first; the Borough’s centres are not equal (even though they are equally important) and the Borough’s premier retail and tourist destination deserves to be highlighted as such.

4.12 We have assumed that the desire to secure a shift in balance between the west and east of the Borough is an important part of the Core Strategy. We do not feel that this secures the emphasis which it ought to achieve – it is referred to in the sub-area of Mitcham (e.g. paragraph 14.2) but more could be made of this important policy intention.

4.13 Finally, at the start of each of the sub-area chapters, one strategic growth objective is highlighted but the proposals within each of the sub-areas probably relate to a number of the strategic objectives. Is it therefore appropriate to highlight just one strategic objective, or to do so without an explanation as to why this is being done?

**Chapter 13 (Colliers Wood)**

4.14 Key points:

- We query the process that is set out in relation to designation as a district centre – presumably designation as a district centre is at the discretion of the Mayor/London Plan - text suggests that the Council would secure this designation once the master plan has been prepared
- Various terms are used to describe Colliers Wood – town centre, (future) district centre, out-of-town retail park – all might be correct in different circumstances but the text does not set this out clearly and there is a lack of consistency
- Brown & Root building is both criticised (…with other features it results in “an area which lacks visual amenity” but is later described as a “pinnacle”) – is it really appropriate to single out this one building?
- Relationship between paragraphs 13.19 and 13.20 not clear – seems to suggest that the risk of flooding outweighs the designation as Area for Intensification but then goes on the talk of the benefits of district centre designation.
- SA box refers to ‘high density’ development. Is this really what is proposed or is a more balanced approach sought between a height of development that is commensurate with the character of the local area, the PTAL analysis and the need to retain open space within the Borough?

**Chapter 14 (Mitcham)**

4.15 Key points:
• The statements on viability (e.g. paragraph 14.3 et seq.) create doubt that the strategy can be achieved. Should the SPD be replaced by a master plan and Area Action Plan?

• There are a number of key initiatives in Mitcham that ought to enhance its prospects of successful regeneration - the text comes across as being rather hesitant about the prospects of success in the current economic climate with many factors being reliant on the private sector/development control process. Even if this is the reality of the situation the Borough needs to act as ‘champion’ for a better future.

Chapter 15 (Morden)

4.16 No comment.

Chapter 16 (Raynes Park)

4.17 No comment.

Chapter 17 (Wandle Valley)

4.18 No comment.

Chapter 18 (Wimbledon)

4.19 Key points:

• Wimbledon is the Borough’s premier town centre and it seems inappropriate that it should appear at the end of a list of sub-areas. It could be used to drive forward the economic prosperity of the Borough and have a catalytic effect on other centres (the effect of the Wimbledon ‘brand’).

• The text does not make sufficiently explicit the difference between Wimbledon town centre and Wimbledon village.

Chapter 19 (Centres)

4.10 Key points:

• Figure 19.1 is very specific – this information could have been conveyed in a more diagrammatic form. If more detail is required this could be submitted in a subordinate document.

• The diagram needs to differentiate between confirmed District Centres and Colliers Wood which is a proposed district centre

Chapter 20 (Housing)

4.21 Key points:

• Something has gone wrong with the numbering system – Chapter 20 (Housing) should contain policies 8-10 (not 7-9).

• Policy SC9 (Housing Provision) should be presented first

• The housing numbers are too specific – they should be rounded to the nearest 50 or 100.

• There is a lot of detail in the background information that will rapidly go out of date.

Chapter 21 (Infrastructure)

4.22 Key points:
• Don’t understand reference to INV1 in delivery section

Chapter 22 (Economic Development)

4.23 Key points:

• Same point as previously in terms of the level of detail on the plan.
• Same point as previously in relation to the definition of town, etc. centres –
• All centres need to be named on plan – or none named – plan has mixed approach at present

Chapter 23 (Open Space, nature conservation, leisure and culture)

4.24 Key points:

• Unusual association of open space/nature conservation and leisure/culture/education. We would suggest that these be split into separate policies one dealing with the natural environment and possibly leisure facilities, the other dealing with play and education. Whilst there might be a relationship between all, the needs of education and other built facilities are quite different.
• Fig 23.1 – colours in key do not relate well to those on plan – difficult to read
• Fig 23.2 – this information has already been shown in previous plan – better on this one, more focused
• Fig 23.3 – ditto the above, as this is policy based
• Fig 23.4 – not convinced that level of detail is appropriate a Core Strategy even though a policy on local play is justifiable – too detailed

Chapter 24 (Design)

4.25 Key points:

• Generally, quite a lot of detail is given when this is already covered in a sub-ordinate planning document
• Fig 24.1 – plan is not really legible – too detailed
• Not necessary to include this information in a Core Strategy; can all be contained in a subordinate document
• Fig 24.2 – this information is too detailed for a Core Strategy – it should be left to Merton’s Design SPD
• Lack of clarity between what is a sub-area (as per Ch 12); ‘character areas’ referred to in paragraph 24.11 and ‘Merton’s Distinctive Areas’ shown on Fig 24.2

Chapter 25 (Climate Change)

4.26 No comment.

Chapter 26 (Flood Risk Management)

4.27 No comment.

Chapter 27 (Waste Management)

4.28 No comment.

Chapter 28 (Transport)

4.29 Key points

• Fig 28.2 is difficult to read – too much detail
- Particularly difficult to read where notations are overlain
- Policy CS19g – give name of DPD referred to
- Can Tramlink and Northern Line extensions be shown on a plan/diagram?
- Why is more specific mention not made of these proposals in the Plan?
5.0 CHAPTERS 29-30: DELIVERY, IMPLEMENTATION AND MONITORING

5.1 PPS12 states in paragraph 4.4 that the delivery strategy is central to the plan-making process. It explains that the Plan needs to show how the objectives will be delivered, whether through actions taken by the council as planning authority, such as determining planning applications, or through actions taken by other parts of the Council or other bodies. Particular attention should be given to the coordination of these different actions so that they pull together towards achieving the objectives and delivering the vision. The strategy needs to set out as far as practicable when, where and by whom these actions will take place. It needs to demonstrate that the agencies/partners necessary for its delivery have been involved in its preparation, and the resources required have been given due consideration and have a realistic prospect of being provided in the life of the strategy. If this is not the case, the strategy will be undeliverable.

Chapter 29 Delivery

5.2 PPS12 requires the Core Strategy to define the infrastructure planning process to identify, as far as possible:

- infrastructure needs and costs
- phasing of development
- funding sources, and
- responsibilities for delivery

5.3 Generally Chapter 29 seems to be a useful section that explains how the policies of the Plan will be implemented.

5.4 Key points:

- Table 29 is useful summary of who has responsibility for various matters in the Borough but it could be placed in an appendix and referenced in the text. Also there is no need to refer to both Chapter numbers and policy numbers – or at least explain that the first number in Column 3 is a chapter number.
- Funding Sources sub-section could be set out in tabular form

5.5 The Core Strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations.

Chapter 30 Monitoring

5.6 This chapter remains to be completed but generally the approach adopted seems to be appropriate. Indicators need to be specific and targets need to be set in such a way that they can be quantified, thereby allowing comparison year on year. Not sure what is intended to be in the final column (Merton Strategy) – if it simply refers to the annual monitoring report this could be done more succinctly in the text.
6.0 MINOR MATTERS

General

6.1 The document needs to be proof read: there are several typos, words missed out, formatting issues, etc. that we have not highlighted. Some policy numbers have changed and not followed throughout the document.

6.2 The references to other policies are a bit long-winded e.g. “In accordance with Chapter 24 ‘Design – Policy 14’”. It would be preferable to refer just to the Policy number to assist with the legibility of the document.

6.3 Some terms are not explained e.g. ‘soundness’. In that particular case, an explanation in the text would be more helpful than relying on a referral to the questionnaire. We agree, however, that most other terms should be explained in a Glossary.

Plans

6.4 Some of the plans are difficult to read – there could be better choice of colours, particularly where some matters are overlain on others.

6.5 Plans need to be referenced within the text.

6.6 Most would benefit from being more diagrammatic and some could be deleted given that the information is already available in a subordinate document.