

Response to the draft Sites and Policies DPD from Merton Borough Liberal Democrats

Contents:

- Comments on policies – A. New policy suggestion: Putting locals in the lead
- Comments on policies – B. Comments on policies outlined in the Sites and Policies DPD
- Comments on sites outlined in the Sites and Policies DPD

COMMENTS ON POLICIES

A. New policy suggestion: Putting locals in the lead

Executive summary: We note the stated aim of reviewing the first draft of the policies in the Sites and Policies DPD as allowing “communities to get involved early on considering how sites could be used effectively and realistically, rather than at a later planning application stage”. In order to help achieve this objective, we would like to see the DPD contain a specific policy outlining a framework for engaging the local community as active participants in the development of sites in their neighbourhoods – putting locals in the lead (such a policy would be in a similar vein to policy DM D1, Design Considerations in all developments). Below we set out why we think this policy is required and some ideas about how this framework might look.

1. **Introduction.** The sites identified in the draft Sites and Policies Development DPD are substantial and often at the heart of neighbourhoods. We believe that where large scale new development is proposed for such sites it is vital to engage with the neighbouring residents, businesses and communities who clearly have a stake in the future of the area.

2. If executed successfully, community-led planning of major developments will engender a greater faith in the planning process as a whole, a harmonisation of interests between communities, the public and the private sector, leading to wider gains, including the fostering of a more vibrant, participatory local democracy, a more informed electorate and increased social cohesion.

3. We are disappointed that the opportunity has not been seized to outline plans for empowering local communities in relation to large scale developments on sites in their neighbourhoods.

4. **Why a community-led approach to planning and regeneration?** It is generally accepted that traditional ‘top down’ models of planning large developments are insensitive and unresponsive to the needs of the local community and, very often, unsuccessful in respect of local community satisfaction^{1 2 3 4}. Furthermore, ‘top-down’ models often lead to greater resistance from local

¹ Duffy, K. and Hutchinson, J., (1997), ‘Urban Policy and the Turn to the Community’, *Town Planning Review*, Vol. 68, p. 347.

² Adamson, D. (2010), *The Impact of Devolution: Area-based Regeneration in the UK*, Joseph Rowntree Trust.

³ Duncan P. and Thomas, S. (2000), *Neighbourhood Regeneration: Resourcing Community Involvement*, Bristol University Press.

⁴ Balch, C. (2011), *Power to the People: The Future of Planning in a Localist Landscape*, Localis.

communities, where they feel alienated and often unable to ensure that development meets local needs and takes satisfactory account of the tensions between development and conservation, environmental quality and pressure on services.

5. Several experts and stakeholders recently told a Greater London Assembly inquiry into community-led planning that:

“early community engagement can bring considerable benefits. In particular, telling local residents about prospective development allows them to contribute proactively to planning proposals, rather than reacting – often negatively – to finalised applications”⁵.

6. The Government’s stated commitment is to empowering local communities and the new powers provided to them via the Localism Act 2011. Describing the Government’s agenda in relation to local planning, the Planning Minister, Greg Clark said:

“The Government’s intention is to give communities a far greater sense of ownership over decisions that make a big difference to their quality of life. They [the powers in the Localism Act] will allow for the exercise of genuine power at a local level; and put the ideals of the Big Society at the heart of planning”⁶.

7. The Act provides a statutory framework within which local communities can create community-led plans (which in the Act are called Neighbourhood Plans) to meet local aspirations.

8. The Council’s stated aim in relation to the forthcoming regeneration of Colliers Wood, South Wimbledon and Mitcham is outlined in a motion passed by all parties at the February 2012 Council meeting:

“This Council further notes that regeneration projects often prove most successful when local residents, businesses and other stakeholders are able to actively participate in, and contribute to, regeneration plans. Therefore, this Council requests officers to draw up a series of ideas, utilising examples of best practice from across the country, which involve members of the local community as pro-active partners at all stages of the regeneration.”

9. Beyond consultation and towards participation. Residents often view the planning system as complex, intimidating and unresponsive to environmental, economic or social concerns and, significantly, lacking in overall transparency. At the stage where plans are drawn up there may be a consultation (designs being displayed for instance) but it is an expert-led dialogue and although there may an opportunity to submit “evidence”, the language is formal and technical. Unless people are directly involved as applicants for planning permission, submitting an objection or acting as a statutory consultee, they have little opportunity to see the planning system in action.

10. Community-led planning is a process by which planners do not impose their opinions but incorporate the robust findings of community priorities. In such circumstances the planner is more of a facilitator than a prescriber. As a result of this process there will be general agreement and consensus on the desired outcome of plans.

⁵ GLA Planning and Housing Committee, (2012), *Beyond Consultation: The role of neighbourhood plans in supporting local involvement in planning*, Greater London Authority

⁶ Minister of State for Planning, Speech, 30 November 2010

11. Such an approach does not give a community total control over development in their neighbourhood: planners have a vital role in identifying the boundaries (legal, financial and technical) within which communities must work and acknowledge. The planner is also responsible for providing practical ideas on how agreed outcomes might be best achieved.

12. Experience from the USA of ‘collaborative local planning’ has shown that successful community empowerment depends on several inter-related factors:

- a. The process must be truly inclusive, with all stakeholders and affected groups invited to the table.
- b. The community must have the final decision-making authority.
- c. There must be wholehearted commitment from the relevant local authority.
- d. Participants should be given clear objectives by planning staff facilitating the process by providing guidance, expert opinions, and research.
- e. Facilitators must be skilled in working with communities⁷.

13. How might a community-led approach to planning major developments work in Merton?

Ensuring that the community surrounding a proposed new development site is fully engaged will require new approaches.

14. Initiating engagement: For the reasons set out above it is desirable for members of the local community to play a greater participatory role in respect of planning major developments in their neighbourhood. Members of the local community should be informed at the earliest possible opportunity of impending major developments in their area. Ward councillors will often be best placed to begin this process and should be encouraged to do so. If necessary, ward councillors should be offered additional training in community stakeholder engagement.

15. Defining the development’s surrounding neighbourhood: In Merton’s urban and suburban environment it may be difficult to identify the right area surrounding a proposed site for development within which the community should be involved. Urban and semi-urban environments, where people are often highly-mobile – will inevitably involve ‘fuzzy’ boundaries. The broadest possible interpretation of a proposed development site’s neighbourhood should therefore be adopted in most cases. For the largest developments this may be existing ward or community forum boundaries, while for smaller developments it may involve just those residents, businesses and other stakeholders on adjacent streets. In all cases a pragmatic approach should be adopted.

16. Ensuring those engaging are representative of the community: A key challenge when securing community participation in local planning decisions is to achieve a level of response and engagement which is representative of the neighbourhood. Existing research and examples of community-led planning suggest that existing structures (such as business groups, residents associations and community forums) should be utilised wherever possible. However, these alone will often not be enough, particularly given that some areas may not have existing structures in place. In such circumstances the Council, in coordination with the developers, should be responsible for facilitating bespoke groups to represent the community in the planning process. Ward councillors will play a significant role in this process of facilitation, and appropriate training should be provided.

⁷ Cited in *The Power of the Plan*, Carnegie Trust UK, February 2011.

17. Resourcing local communities to participate in planning: Community-led planning is a relatively time and resource intensive process. However, given the many advantages, both quantifiable and less tangible set out above, it is likely to prove worth the effort. Developers should be encouraged to fund further community engagement strategies via a strengthened Statement of Community Involvement, and all possible provisions for pre-application consultation provided by the Localism Act should be utilised. However, there are limitations to developer-funded engagement, most notably clear issues of independence. Voluntary participation should be encouraged – and in many cases this may provide a significant resource – but cannot, and should not, be relied on alone to provide an alternative to developer-funded engagement. It may be necessary for the Council to provide some funds, particular in terms of technical and logistical support.

18. This section of the Liberal Democrat response to the consultation has begun to address this absence by providing a basic framework for engaging the local community as active participants in the development of sites in their neighbourhood.

B. Comments on policies outlined in the Sites and Policies DPD

In general terms, we feel that the DPD should give communities as much freedom as possible to develop neighbourhood plans appropriate to their area – and supported in doing so through proper engagement.

DM R5 (f) Hot food take-away. Whilst we would support proposals to restrict an over-concentration of hot food take-away (A5 uses) in a given area, we are not sure of the justification for this as to do otherwise detracting from the ability of individuals to adopt healthy lifestyles. In order to remain viable, we believe suitable areas should contain a mix of food and drink uses, as well as other commercial uses.

DM H2 Housing Mix. We note there is no mention of affordable housing (this may be because other policies consider this) – but we feel this is an essential part of creating socially mixed communities in line with the aim of this policy. However, we were concerned by recent planning applications that have managed to avoid the 40% affordable housing target “due to viability issues”. The said viability issues largely relate to the value of the land which has decreased since purchase. However, the conditions placed to review the viability of affordable housing on the site, just prior to development, or immediately after development, would still allow a site owner willing/able to sit on the development (after building) until the land value is more favourable, to sell on the site, minus an element of affordable housing.

DM C2 Education. We note below that the Council’s preferred use for the vast majority of sites in the list of potential sites for new uses would seem to be incompatible with this policy’s aim to ensure there are “sufficient school places”. There are already significant shortages of primary school places, and a recent report to cabinet revealed that there will also be a massive shortage of secondary places within the next few years. We are not sure that the policy is strong enough – it is not enough just to make provision for instances where large development sites will “result in a substantial increased need for school places”.

DM E4 Local employment opportunities. We feel that in so far as practicable, all such employment opportunities should be paid at least at the level of the London Living Wage.

DM O1. Open Space. Given that many of the potential sites in the borough for development do not include existing open space, we are not convinced it is enough to consider merely whether a development would lead to a net loss of open space.

DM D1. We feel that this policy is hugely important – we would like to see stronger provision made in relation to requiring developments to “relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings”

COMMENTS ON SITES OUTLINED IN THE SITES AND POLICIES DPD

In general terms, we felt that the potential use of each individual site had been considered in the abstract – and not as part of a wider whole.

For example, of the 47 sites, the “Council’s preferred use” for the vast majority is residential use, or at least some element of it. If this came to be, this would not be in accordance with Policy DM C2 Education. We would like to see this list of sites include proposals to build new educational facilities.

Similarly, existing individual car parks are good potential sites for development. However, if sites proposals 01, 12, 28, 33, 34, 58, 60, 61 were all developed in line with the expressed preferred use, vast chunks of Merton’s town centre parking provision would be removed (in Wimbledon, Mitcham and Morden).

We would prefer to see a more strategic overview of the development of sites in the borough (ideally with a much more community-led focus on the preferred development of sites, as outlined above).

Given the agreement at the February full Council to adopt a resident-led regeneration plan for Colliers Wood, we note the number of sites from the Colliers Wood area in this list of potential sites.

01 “P3” Hartfield Road Car Park and 28 “P4” Land adjoining Wimbledon Theatre. We agree that the cumulative impact on town centre parking must be considered if both of these sites are developed. Previous plans for an underground multi-storey car park at P3, and the removal of all parking at P4 would have ensured that a sizable proportion of Wimbledon’s town centre parking would have become concentrated around an already congested one-way system.

We are sympathetic to the suggestions to use either of these sites for community and public hall uses. However, full consideration must be taken of the needs of the groups that would use such a space – for example, Wimbledon Choral Society’s need would be different to that of Wimbledon Light Opera Society.

06 Durnsford Road Corner. This area is currently a fly-tipping hotspot. A more ‘formal’ use of this area would discourage such activity, so we support the preferred use. However, any pocket park would require additional anti fly-tipping measures to other areas to change the behaviour of habitual offenders.

15 West Barnes Library. The Site Description is not very accurate as it states “The Road has no active frontage along the street except for the library itself”. This ignores Saipem House, the Early Beatty public house and a small mini-cab firm. We are in favour of the continued use of the site as a library and welcome the proposals to enhance the library provision, funded by suitable development. Some residents have suggested that the rest of the site could potentially be used non-residentially, for example as a GP surgery / health centre. A few residents are concerned that flats above the library would increase parking problems in the area. Any proposed changes to the site should be considered in the light of changes to neighbouring Saipem House. We understand that the owners of Saipem House are seeking new tenants. Saipem House is on the list of possible sites being considered by Raynes Park Christian Free School, which is applying to the DES to open in the area.

16 Wimbledon Library/Marleborough Hall. We are in favour of the continued use of the site as a library and welcome the proposals to enhance the library provision, and would especially support use of the remaining parts of the site for community (D1 use class). For office and residential uses, appropriate parking and servicing arrangements would need to be made.

19 Nelson Hospital. We note that a planning application process has begun for this site. We would note the relatively low PTAL 3 level and have concerns about additional traffic on the already congested Kingston Road.

37 Wimbledon Greyhound Stadium. The surrounding area has changed greatly within the last decade, with the large development of flats on Durnsford Road. As such, the area is no longer predominantly industrial. We do not support the use of the site for industry due to its proximity to residential properties and local road capacity. We feel it would be a great shame to lose the sporting heritage of the site.

41 Kingston Road opposite Lower Downs. This area could be an interesting one for a pocket park given it is adjacent to a nature conservation area, the shape of the site, and the potential for detrimental traffic impacts.

55 Field B St Catherine’s Square. The penultimate paragraph of the “Issues” section seems unclear. Will the play space require extra maintenance because it is adjacent to a SINC, or will the SINC require more maintenance because it is next to a play space? The need to position the children’s play area to keep the bulk of the field as open green space will require careful thought, as will access to the play area. It is not clear from the site proposal whether the nature reserve would be open to the public or would be permanently closed to the public. Although the habitat records do not show the presence of protected species on the site in 2006, the grassed area could in future be managed as a meadow and meadow species appropriate to the soil conditions could be planted and allowed to naturalise. In addition part of the area could be planted as a small woodland, which would also increase biodiversity. Careful consideration will need to be given to on-going maintenance costs. Management is always needed, whether it be mowing, arboricultural work, inspection to ensure invasive species such as Japanese knotweed do not grow there, removal of litter etc. It is worth remembering that voluntary organisations have limited resources and recruitment of committed volunteers is not easy; for example the London Wildlife Trust has given up its management on several small reserves, including the Cannon Hill Common Nature Reserve. The site owners will need to set up an appropriate funding package to create a nature reserve and to maintain it. Maintenance of the Meadowsweet Close ditch (the responsibility of the housing association) has been an issue

which the RP & WB Residents' Association deal with regularly. Perhaps the work on this ditch and on the Pyl brook should be linked and included in any plans for the field. Residents in Grand Drive suffer flooding if maintenance is neglected. We believe that the using the land for a nature reserve would be good for the local environment but that the long-term maintenance costs will need to be set in place.