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Dear Sir

Draft Sites and Policies Development Plan Document and Draft Proposals Map

Further to your request for commentary from the public as a part of the consultation on the above Development Plan Document and Proposals Map, I am pleased to be able to respond on behalf of the Merton Conservative Group. We would appreciate it if our comments could be taken into account when the second round consultation is launched later this year. Please also find a table in the Appendix to this letter which outlines those sites listed within Part 2 of the consultation. This table highlights those proposed sites where we disagree with preferred usage of either the Council or the site owner (where they are not the Council).

For ease of reference I have cross-referenced to the sections within the document.

DM R1: Location and scale of development in Merton's town centres

We welcome the focus on Merton's town centres and neighbourhood parades within this section. We do however feel that it is important to stress the importance of parking facilities within this section.

- Neighbourhood parades located on routes of heavy traffic flow should provide an opportunity for free short stay parking where it is not already present and should accord with the 20 minute free policy.
- Neighbourhood parades should also provide an opportunity for businesses to be able to load and unload outside of their businesses for short periods of the day where this is not already present.
- The Sites Proposals section of the consultation recommends that approximately 60% of Wimbledon's car parks are developed. We believe that this will be very detrimental to the commercial offering of the town centre and would like to see these car parks retained and improved, not built upon and lost.

DM R2: Out of centre commercial development

We support the principal of 'town centre first' for commercial development and would not wish to see any policies which encouraged out of centre commercial development which placed it in direct competition with our town centres and neighbourhood parades.

DM R4. Protection of shopping facilities within designated shopping frontages

The look and feel of shop frontages within Merton is a crucial aspect of providing some rhythm and harmony to a town centre or neighbourhood parade. As a result, we would recommend that the Council requires planning permission be sought for any shopfront signage. We also recommend that there be a specific requirement for the constant height and protrusion of shop frontages. A mixed street frontage where they are all at different heights makes a street front look unfriendly to the eye.

Regarding the provision of amusement centres, it is not clear from the document whether betting shops are also included under the heading of 'Amusement Centres'. If they are, then we agree with statement in 1.53 that they are not appropriate uses in core shopping frontages. We would also argue that such premises should not be located near schools and other premises designed for young people, such as youth and community centres.

DM R5. Food and drink/leisure and entertainment uses

The Council should afford as much protection as it can to the borough's community pubs. It should also seek to restrict the proliferation of hot food takeaways on parades and town centres.

- A minimum timeframe of meaningful marketing of a community pub on the open market should be required before permission is granted for its closure/conversion to other uses. A suggested timeframe of 30 months is proposed and, in any case, should be no less than the current minimum stipulated timeframe.
- The provision in section 1.76 to permit no more than 3 hot food take-away premises in 10 seems high. We would recommend a reduced concentration limit.

DM H2. Housing Mix

There has been an overdevelopment of 1 and 2 bedroom flatted properties, which has reduced the relative supply of family housing in the borough, resulting in demand outstripping supply and an additional driver to the higher than average house prices which exist in many parts of Merton. As a result, we recommend the following:

- An increased emphasis on the provision of family sized homes rather than smaller flatted properties.
- Houses under 120m² floorspace should not be given permission to be converted into flats.

DM C1. Community facilities

We agree that community centres should be able to cater for a range of services, however we would discourage the development/conversion of centres and public halls into mixed use with residential. Invariably the quality of the residential accommodation is not always of a high standard and the two demands of a lively community centre and residential accommodation can be incompatible.

We would also support a policy which sought to ensure that each of the borough's town and local centres had its own community centre.

DM C2. Education

We believe that the 'Policy Aim' for this policy should not only seek to provide sufficient school places but should also acknowledge the following additional points and plan accordingly:

- That demand in some parts of the borough for primary school places is outstripping demand.

- That primary school children should be able to walk to their school and that sites which support this should be sought.
- Any excess school land should be retained for future educational requirements and should not be developed for other needs such as housing etc.

We would also recommend that, prior to permission being granted for any significant development, an independent piece of analysis should be conducted to show the number of additional school and patient roll places that will be required as a result. This should then be compared to the current local capacity in the vicinity of the development. Should the capacity be insufficient, then this should be considered as a basis for refusing the application.

DM E1. Employment areas in Merton

Employment land should be protected wherever possible. Any decision to relinquish employment land should be accompanied by evidence that the land has been marketed as such for a minimum time period.

DM E2. Offices in town centre locations

Whilst the desire to reduce the use of the car to travel by car is laudable it is also often unrealistic and our town centres should not become areas where anyone who requires the use of a car feels unable to visit or work. We therefore recommend the removal of the words "...and minimise the need to travel by car" from paragraph 4.17.

DM O2. Trees, hedges and landscape features

We support the principle of protecting trees, hedges and the natural landscape. However, we feel that the provisions for the replacement of trees which have to be felled should be stronger and would like to see the inclusion of a policy which states that any tree which is removed should have a like-for-like replacement. It is not acceptable that mature trees with large coverage can be felled and replaced by an inferior specimen.

DM D1. Design considerations in all developments

Whilst the detail of acceptable design will be forthcoming in a design SPD, we are concerned that the Council will welcome 'innovative, contemporary and sustainable design' without any explicit regard to its surroundings.

Any proposed design policy must ensure that any planning application compliments those properties which both neighbour it and are within its vicinity. Many parts of Merton contain buildings of architectural merit which have been allowed to have buildings which are not in keeping with them to be built on neighbouring plots. This cannot be permitted under any future design policy.

DM D3. Managing heritage assets

We are concerned with the inclusion of paragraph C in this section. The Council must resist any planning proposals which would seek to do substantial harm to our heritage assets under all circumstances. We would therefore like to see this paragraph strengthened through the inclusion of a requirement for a strong and public case being demonstrated to justify the proposed harm to be inflicted on the asset.

DM D4. Urban design and the public realm

Whilst agreeing with most of the points made in this section, we would like to see Policy (h) strengthened, and instead seek to discourage the conversion of front gardens for vehicle crossovers on roads with light traffic flow, encourage

the use of permeable surfaces where they are permitted and ensure that there is a minimum distance which is enough to fit an average size saloon car without having the rear of the vehicle protruding over the pavement.

We would also like to include a section within this policy which requires the council to adhere to its own Public Realm Strategy and also commits to only using 'high quality materials'.

DM D5. Advertisements

Please see our response to section DM R4. Protection of shopping facilities within designated shopping frontages.

DM D7. Shop front design, alterations and advertising

Please see our response to section DM R4. Protection of shopping facilities within designated shopping frontages.

DM T3. Applying relevant car parking and service standards

It is our view that, in many instances, the Council has applied car free status to planning applications where the expectation that no residents would require, or wish, to own a vehicle is unrealistic. We agree that many of our residential streets are already stretched with the level of parking spaces, but the Council should therefore insert a requirement for more sites to have sufficient on-site parking facilities rather than no parking at all. This policy must seek to recognise this undeniable fact.

Grouped Sites – Wimbledon

This section specifically welcomes applications for tall buildings along The Broadway. We feel that to welcome tall buildings to this area would be incorrect. Instead, applications should be encouraged for buildings which will not diminish the standard of living for those who live just off The Broadway. Recent applications for 7 and 8 storey budget hotels would become increasingly difficult to refuse if this policy proceeded. We therefore recommend the removal of this sentence.

In summary, we thank you for the opportunity to respond to this consultation. We are however concerned that many residents and businesses who are located close to the draft list proposals are not aware of this consultation. We would therefore recommend that, assuming that they have not been proactively contacted, the deadline for this consultation is extended to allow council officers to establish contact with those who neighbour those sites and to understand their opinions before progressing any further.

Yours sincerely

Cllr Henry Nelless

Deputy Leader and Environment Spokesman, Merton Conservative Group

Ward	Site	Current Usage	Council's Preferred Usage	Con Group Preferred Usage
Abbey	Leyton Road Centre, 21 Leyton Road, Colliers Wood, SW19 1DJ	Children's Centre	Community and Residential or Residential Only (subject to community facility finding alternative provision)	Children's Centre or Community (not both)
Abbey	Patrick Doody Clinic, Pelham Road, Wimbledon, SW19 1NX	Health Centre	Healthcare and residential	Residential or Healthcare (not both)
Abbey	Merton Hall, 78 Kingston Road, Wimbledon, SW19 1LA	Community	Community and Residential or Residential Only (subject to community facility finding alternative provision)	Community only
Abbey	P4 - Wimbledon Theatre Car Park, 111-127 The Broadway, Wimbledon, SW19 1QG	Car Park	Residential and town centre uses (retail, restaurants, leisure, offices)	Car Park
Abbey	The Old Lamp Works, 25 High Path, Colliers Wood, SW19 2LQ	Warehouse/Office	Offices and Residential	Employment or Offices
Abbey	165-171 The Broadway, Wimbledon, SW19 1NE	Commerical and Offices	Retail, offices, community and residential	Retail or Offices
Colliers Wood	43-45 Palestine Grove, Colliers Wood, SW19 2QN	Dilapidated warehouse building	Residential	Residential or Employment
Colliers Wood	Colliers Wood Community Centre, 64-72 High Street, Colliers Wood, SW19 2BY	Community Centre	Mixed use community and residential	Community Centre
Colliers Wood	Taylor Road Day Centre, Wakefield Hall, Taylor Road, Mitcham, CR4 3JR	Day Centre	Residential	Community/Day Centre
Colliers Wood	60 Pitcairn Road, Mitcham, CR4 3LL	Vacant industrial building	Residential	Employment
Colliers Wood	Thames Water Site, Byegrove Road, Colliers Wood, SW19 2AY	Sewerage pumping station	Open land and nature conservation	Open land and nature conservation
Cricket Green	Worsfold House/Chapel Orchard	Council offices and school building	Residential	School/Education
Cricket Green	Wilson Hospital, Cranmer Road, Mitcham, CR4 4LD	Health Clinics and GP's Surgery	Community use and either healthcare or education and residential	Community and Health
Cricket Green	1-7 Birches Close, Mitcham, CR4 4LQ	Specialist health facilities	Community use and either healthcare or education and residential	School or Healthcare
Cricket Green	Brook House, 1a Cricket Green, Mitcham, CR4 4LA	Vacant (former office use)	Office, community or residential	School or Employment
Dundonald	Land Between 424-448 Kingston Road, Raynes Park, SW20 8DX	Vacant Land	Residential	School or Employment
Figges Marsh	Mitcham Library, London Road, Mitcham, CR4 2JB	Library	Library with part residential to support library function	Library
Hillside	Wimbledon Library/Marlborough Hall, 35 Wimbledon Hill Road, Wimbledon, SW19 7NB	Library	Library and either residential, community, office or retail	Library
Hillside	Wimbledon Community Centre, 28 St George's Road, Wimbledon, SW19 4DP	Community Centre	Mix of community, residential and commercial use	Community
Hillside	Wimbledon Delivery Office, 12 Cranbrook Road, Wimbledon, SW19 4HD	Royal Mail Sorting Office	Offices and Residential	Offices or Residential

Ward	Site	Current Usage	Council's Preferred Usage	Con Group Preferred Usage
Lavender Fields	Bond Road Day Nursery, 55 Bond Road, Mitcham, CR4 3HG	Single Storey Day Nursery	Community and Residential or Residential Only (subject to community facility finding alternative provision)	Community
Lower Morden	Morden Assembly Hall, Tudor Drive, Morden, SM4 4PG	Community Hall	Community and Residential or Residential Only (subject to community facility finding alternative provision)	Community
Merton Park	Nelson Hospital, 220 Kingston Road, Wimbledon, SW20 8DB	Hospital	Health and Community with nursing home and/or residential	Health and Community, potentially with nursing home. Not residential
Merton Park	Morden Road Clinic, 256 Morden Road, Wimbledon, SW19 3DA	Medical Clinic and Retail	Healthcare and residential	Healthcare
Merton Park	Morden Station Offices and Retail Units, 66A-82 London Road, Morden, SM4 5BE	Retail and Offices	Retail, offices and residential	Retail and/or Offices
Merton Park	Sainsbury's Car Park, RO 127-149 Kenley Road, Morden, SM4 5BE	Car Park	Retail, offices and residential	Car Park
Merton Park	York Close Car Park, Morden, SM4 5HW	Car Park	Residential	Car Park
Ravensbury	Wyvern Youth Centre, 18 Arras Avenue, Morden, SM4 6DF	Youth Centre	Residential	Community/Youth Centre
Raynes Park	9 Amity Grove, Raynes Park, SW20 0LQ	Medical Clinic	Community and Residential or Residential Only (subject to community facility finding alternative provision)	Community/Healthcare
Raynes Park	80-88 Bushey Road, Raynes Park SW20 0JH	Offices, Light Industry	Employment led mixed use	Employment
St Helier	Chaucer Centre, Canterbury Road, Morden, SM4 6QB	Traning and conference centre	Community and Residential or Residential Only (subject to training facility finding alternative provision)	Education and Community
Trinity	Queens Road Car Park, Queens Road, Wimbledon, SW19 8LR	Car Park alongside railway	Residential	Car Park
Trinity	YMCA, 196-200 and 220-224 The Broadway, Wimbledon, SW19 1RY	YMCA	Retail, offices, community and residential	Community and Leisure
West Barnes	West Barnes Library, West Barnes Lane, 10 Station Road, New Malden, KT3 6JJ	Library	Library and residential	Library
West Barnes	St Catherine's Square, Grand Drive, Raynes Park, SW20 9NA	Open space	Nature reserve	Nature Reserve
Wimbledon Park	Land at Durnsford Road/Gap Road Corner, SW19 8JF	Park	Residential	Park
Wimbledon Park	Land adjacent to 10 Home Park Road, Wimbledon Park, SW19 7HN	Vacant site	Residential	Green space
Wimbledon Park	Wimbledon Greyhound Stadium, Plough Lane, SW17 0BL	Greyhound Stadium and Car Park	Sporting activity or industrial and warehousing	Sporting
Wimbledon Park	7, 8 and 12 Waterside Way, Tooting, SW17 0HB	Vehicle operating centre	Business, industrial and warehousing	Employment