

Committee: Borough Plan Advisory Committee

Date: 07 January 2007

Agenda item: 4 Public Session

Wards: All

Subject: The Draft Core Strategy Public Consultation

Lead officer: Head of Sustainable Communities, James McGinlay

Lead member: Cabinet Member for Planning and Traffic Management; Cllr William Brierly

Forward Plan reference number: n/a

Contact officers: Tara Butler and Valerie Mowah, Spatial Planning Policy Team

Recommendations:

- A. To inform members on the progress of the 2009 Draft Core Strategy including the results from the September-October 2009 consultation period and implications of new guidance and research.
 - B. To seek Members views on the proposed change of approach to affordable housing (detailed in appendix 2) and to the draft Council responses to consultees (detailed in Appendix 3)
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1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. Following Member agreement in June and July 2009 the Draft Core Strategy was sent out for public consultation between September/ October 2009.
- 1.2. This report summarises the main issues raised from representations, and matters arising from new guidance and research, including the draft London Plan 2009. From these issues, this report highlights the general direction of changes to be made to the draft Core Strategy before its submission for Member approval in February - March 2010, prior to its submission to the Secretary of State.

2 DETAILS

- 2.1. The Draft Core Strategy was subject to a six-week period of public consultation between 07 September and 16 October 2009. Representations were accepted after the 16 October due to the impacts of the London-wide Royal Mail postal strike.

- 2.2. Around 1,800 emails and 200 letters were sent out to notify and invite responses from the public, local community and other key stakeholders on the Draft Core Strategy. Officers attended 27 meetings with groups, including residents' associations, community and voluntary groups, business representatives and government bodies. A list of the meetings attended is located in Appendix 1. In addition officers have undertaken follow up telephone calls to approximately 30 different groups from which we have had a low response rate in the past (known as "hard to reach") to encourage responses on the consultation from all sections of the community.

Responses received

- 2.3. In total 445 representations were received from 262 consultees.. The main policy areas that received responses included open space, nature, leisure and recreational provision; and issues concerning Housing, Centres, Design, Infrastructure and the Mitcham Sub Area.
- 2.4. Although "Open Space, Nature and Recreation – Policy 12" received the largest proportion of representation, more than 50% of the comments received on Policy 12 were regarding the support for a sports stadium specifically for AFC Wimbledon's return to the borough.
- 2.5. The majority of representations generally supported the policy direction and content for the future use of space and development of land in the LB Merton and there were no significant objections to the Draft Core Strategy. Aside from support for a specific site for a new AFC Wimbledon stadium mentioned above, the main issues highlighted by the representations included:
- Requests to make minor changes to policy, content and to the spatial maps;
 - To take into consideration using or making references to existing and emerging LB Merton Strategies and other relevant documents, if appropriate; and to
 - Take into consideration emerging national and regional guidance and policies, in particular, to refer to the changes in policy direction as set out in the Draft London Plan 2009. The significant draft policy changes in the emerging regional plan includes; changes to the affordable housing policy, the protection of back_gardens and backland against development and the provision of smaller and affordable retail units.

Analysis of Key Issues and areas that the Council could consider requiring further work

- 2.6. As well as the consultation responses, more national and regional guidance relevant to Merton's development plans has been published since the consultation draft of the Core Strategy was produced in spring 2009. This includes the Mayor's draft London Plan. Research specific to Merton is also underway. The list below includes some of the considerations that are informing proposed changes to Merton's Core Strategy, as well as the consultation responses:

- Draft PPS15 – Planning for the Historic Environment (July 2009)
- Civil Contingencies Act (November 2009)
- Draft London Plan (October 2009)
- Draft London Economic Development Strategy (October 2009)
- Draft London Transport Strategy (October 2009)
- Merton Draft Economic Development Strategy (December 2009)
- London Office Policy Review (November 2009)
- The Olympic Transport Plan 2nd consultation (December 2009)
- London Housing Design Guide (July 2009)
- London Town Centre Health Check Report (December 2009)
- London Regional Flood Risk Appraisal
- London Draft Interim Housing SPG (October 2009)
- Emerging South West Subregional Strategic Housing Market Assessment
- Merton Emerging Affordable Housing Viability Study (December 2009)
- Merton Emerging Housing Delivery Work (December 2009)
- Merton Strategic Housing Market Assessment (draft) (2009)
- Merton draft Vision for Wimbledon (December 2009)
- Mills Whipp vision for Merton Priory (October 2009)

2.7. Appendix 1 provides a detailed summary of the main issues concerning respondents, issues from new research and government guidance. It also sets out further action currently being considered by the Council.

2.8. The most significant change proposed is to Core Strategy policy 13 – Housing Choice, around the provision of affordable housing. Merton’s recent research into housing viability and the draft London Plan supports the following approach:

- Of schemes of over 10 homes, 40% should be affordable, having regard to economic viability (former proportion was 50%)
- Of those affordable homes, 60% should be socially rented, 40% intermediate (former proportion was 70:30)
- Being clearer about support for a more balanced mix of tenures across the borough, and not supporting mono-tenure communities created by some 100% affordable housing schemes
- Adopting a sliding scale for affordable housing provision for schemes below the 10 unit threshold (1- 9 units) (new element)

2.9. Appendix 2 sets out the proposed change of approach in detail.

2.10. Appendix 3 sets out all the responses received by the consultees and the draft Council response to these issues.

- 2.11. Consultation responses, new national and regional guidance and Merton-specific research will inform Merton's Core Strategy final draft. The proposed timetable for finalising Merton's Core Strategy is as follows:
- 07 January 2010: Borough Plan Advisory Panel: analysis of research, including draft London Plan, responses received and influence on final Core Strategy;
 - 25 February 2010: BPAC: final Core Strategy to submit to Secretary of State;
 - 15 March 2010: Cabinet: approval of final Core Strategy to submit to Secretary of State;
 - 24 March 2010: full Council: approval of final Core Strategy to submit to Secretary of State;
 - June 2010 (after local elections): submission of Core Strategy to Secretary of State preceded by six weeks public consultation.
 - Autumn / winter 2010: public examination of Merton's Core Strategy by an independent planning inspector
 - Spring 2011: assuming Core Strategy passes examination, it can then be adopted by Merton Council.
- 2.12. This is a very tight timetable. When the circulation time for reports is taken into consideration, it leaves less than five weeks to redraft the Core Strategy and seek cross-Council support to the final plan. As well as the consultation responses, paragraph 2.6 indicates the large amount of new information that officers will need to consider when finalising the Core Strategy. The short timeframe increases the risks involved in creating a sound plan.
- 2.13. During this time officers will also be seeking clarity from the Mayor of London on issues that will affect Merton from the draft London Plan, and will be seeking agreement and co-operation from partners on infrastructure delivery. The final Core Strategy will be appraised for sustainability considerations during the drafting of the final plan.

3 ALTERNATIVE OPTIONS

- 3.1 Government planning legislation requires the replacement of existing development plans with a Local Development Plan (LDF). The Core Strategy is a key component of the LDF as it sets out the 15 year spatial strategy for the borough.
- 3.2 There are alternative options around delaying production of Merton's Core Strategy. In this case, planning decisions in Merton would be made on Merton's UDP 2003 and the published London Plan 2008 for longer. Delaying production of Merton's Core Strategy would impact on the production of other Local Development Framework documents, such as moreMorden Area Action Plan, which must follow from the Core Strategy.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. The Core Strategy was preceded by consultation on

- Key Issues (Nov 2005 - Jan2006);
- Options (Feb-April 2006);
- Spatial Options (Nov 2006 – Jan 2007);
- Preferred Options Consultation (June-July 2007).

Responses and feedback from all previous LDF consultations in conjunction with government guidance and research have fed into the preparation of this draft Core Strategy.

- 4.2. The Borough Plan Advisory Committee (BPAC) and Cabinet have been consulted at all stages in the plan making process and approval sought prior to the Draft Core Strategy public consultation.

5 TIMETABLE

- 5.1. Merton's Core Strategy has been prepared in accordance with The Planning and Compulsory Purchase Act 2004 and Part 6 of the Town and Country Planning Regulations sets out the requirements for Development Plan Documents. (Please also refer to para 2.8 above).

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. Additional funding, currently not included within the revenue budget, will be required to fund a public examination of the Core Strategy. The growth requirement is being addressed as part of the 2010-11 estimate process.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. Regulation 26 of the Town and Country (Local Development [England]) Regulations 2008 requires Local Planning Authorities to consult on any proposed Development Plan DPD and to take into account any representations received before submitting the DPD to the Secretary of State for examination. Failure to comply with this requirement could render the DPD open to challenge at examination or risk being found "unsound" by the Planning Inspectorate.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. Principal objectives of Merton's draft Core Strategy includes promoting social cohesion and bridging the gap between disparate communities. Internal consultation processes have included Human Rights and Equalities inputs.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. Merton's draft Core Strategy includes design requirements that contribute to crime reduction objectives.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. Risks are those concerned with legal challenges and loss of grant income should the timetable set out in the Council's Local Development Scheme for the preparation of the Core Strategy not be met.

11 APPENDICES

- Appendix 1: Draft Core Strategy Consultation Report December 2009.
- Appendix 2: Proposed changes to approach to affordable housing in the Core Strategy
- Appendix 3: Consultees comments and draft Council responses

- 11.1 Appendix 3 has been circulated to Advisory Committee members only; and is also available for inspection by Members in the Members Resource Room. Appendix 3 is also available on the Council's web-site with the rest of the agenda at http://intranet/ds-committees.asp?view=event&event_id=2914

12 BACKGROUND PAPERS

The papers use to compile this report were:

1. Draft Core Strategy 2009 (that was sent out for public consultation in September 2009).
2. 'Our Plan Our Future' Summary Document 2009– (Summary Document and Questionnaire that accompanied the Draft Core Strategy 2009)

All Ward Councillors were notified and provided with hard copies of the consultation documents and response form by post. Copies are also available in the Members Resource Room and can be viewed electronically at http://www.merton.gov.uk/living/planning/planningpolicy/ldf/core_strategy.htm

Appendix 1: Borough Plan Advisory Committee

07 January 2010

London Borough of Merton's Local Development Framework:
Draft Core Strategy Consultation

Introduction

Merton's Draft Core Strategy 2009 was subject to a six-week period of public consultation with the community, developers and other key stakeholders between 07 September and 16 October 2009.

According to the timetable, as set out in the Local Development Scheme 6th Edition (LDS) [September 2009], the Core Strategy is intended to be submitted to the Secretary of State in July 2010 and to be adopted in 2011, if found 'sound' by the Planning Inspectorate.

The purpose of this report is to detail the main concerns that were highlighted by the submitted representations, emerging research and the draft London Plan 2009, and to identify further actions required in order to produce the finalised Core Strategy.

2.0: Consultation Sept-Oct 2009

2.1: Approximately 1,800 emails and 200 letters were sent to notify and invite the public, local community and other key stakeholders to make representations on the Draft Core Strategy. Consultees contacted include: Business Organisations; community groups; environment, open space & leisure Groups; Friends Groups; planning consultancies, developers, housebuilders and housing associations; residents associations; statutory bodies such as the Government Office for London (GOL), Greater London Authority (GLA), English Heritage; the neighbouring local authorities (Sutton, Wandsworth, Lambeth, Kingston and Richmond); transport groups; and the utility Companies.

2.2: Notification letters and emails were sent to all libraries in Merton. Paper copies of the consultation documents (the Draft Core Strategy DPD, summary document and accompanying questionnaire) were made available for the public to view in all Merton libraries.

2.3: For this consultation process, the Spatial Planning Team produced a summary document called 'Our Plan our Future' to accompany the Draft Core Strategy DPD. This summary document highlighted the importance of the Draft Core Strategy that was out for consultation and provided a quick synopsis of the proposed strategies and policies for the development and use of land in Merton for a 15 year period.

2.4: The summary document also included a questionnaire, which was based on the requirements of the 'test of soundness' as outlined in PPS12: Local Spatial Planning (2008) [PPS12], for instance, is the DPD 'justified, effective and able to be monitored'. These questions were set out in a reader friendly format and allowed consultees without access to internet facilities to make comments on the Draft Core Strategy DPD. Consultees were also encouraged to provide comments online via the internet. This provided respondents with more flexibility allowing them to make representations on every chapter of the consultation document.

2.5: The Draft Core Strategy (2009) consultation was promoted by a number of different methods including:

χ Issuing a press release and a public notice in the Wimbeldon Guardian (local newspaper);

χ Issuing a press release on Merton's web page and having a dedicated web page to Merton's Draft Core Strategy;

χ Internal communications using the netpresenter, posters (in lifts, parks, and all council owned properties), and the staff bulletin;

χ A stand in the planning foyer space at the civic centre with hard copies of the consultation document and questionnaire; and issuing

χ A notification message on the Merton Connected Website.

2.6: As part of this consultation exercise, Council Officers attended 27 meetings with a number of different groups. These meetings included officers meeting with various residents associations, community and voluntary societies and groups. Figure 1 below provides further details of the meetings attended by Council Officers as part of the consultation period.

Figure 1: Details of Meetings attended by Officers	
Date 09	Meeting Attended
17 August	Dept Communities and Local Government; Dept Energy and Climate Change (Core Strategy climate change policy)
31 August	Merton and Wimbledon Lions Summer Fair
08 September	Willow Lane BID group
10 September	Sustainable Communities and Transport Partnership
	Raynes Park Association
	Wimbledon Society
14 September	Abbey Ward Multi Agency Group
17 September	Mitcham Partnership
	Connexions Centre Wimbledon (ongoing)
	Merton Priory Trust AMG
21 September	MERHAG (Merton's RSLs)
22 September	Colliers Wood Community Forum
23 September	Mitcham Community Forum
24 September	Wimbledon Independent Supporters Association
28 September	Merton Youth Partnership Forum
02 October	Ethnic Minority Community Input Workshops
03 October	Longthornton Redevelopment Working Party
05 October	Environment subgroup of the Merton Sustainable Communities and Transport Partnership
06 October	Merton Park Residents Association
	UK Green Building Council
07 October	Mitcham Youth Centre
08 October	INVOLVE Meeting
13 October	Wimbledon Community Forum
	Merton Priority Trust Group
	Older People's Housing Strategy Team
26 October	Sustainable Communities Housing Sub Group

2.7: Council Officers made follow up telephone calls to approximately 30 different groups from which we have had a low response rate in the past (known as "hard to reach groups") to encourage representation on the consultation from all sections of the community.

2.8: Two weeks prior to the consultation closing date, at least 180 consultees, who were randomly selected from the LDF consultee database, were contacted to remind them that the closing date, should they wish to provide any comments on the Draft Core Strategy, was Friday 15 October 2009.

Reminder email notifications were also sent to all consultees who provided email contact addresses.

2.9: Due to the impacts of the Royal Mail postal strike between September and October 2009, a number of consultees were unable to return their representations before the required deadline. For this reason it was decided to extend the consultation deadline and to accept representations up to the 31 October 2009.

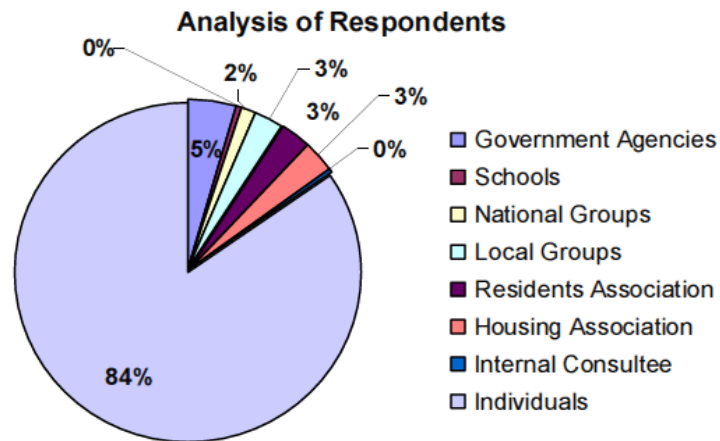
3.0: Analysis of Responses

3.1: We received a total of 445 representations (from 262 consultees), including the community, government bodies and other key stakeholders.

Analysis of Respondents

Figure 2: Analysis of Respondents demonstrates that the majority of representations were submitted by individuals, government agencies, private companies and national and local groups.

Figure 2



3.2: The total list of Organisations that made representations to the LB Merton's Draft Core Strategy 2009 is detailed in Figure 4: List of Organisations that made representations, on the next page.

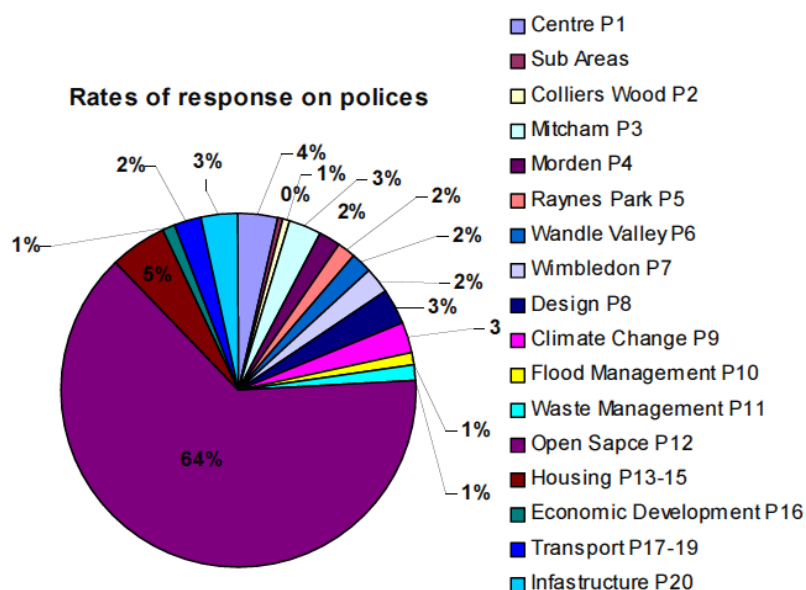
Figure 3: List of Organisations that made representations	
Type	Name
Government Bodies	Environment Agency
	English Heritage
	Homes and Community Agency
	Highways Agency
	Government Office for London
	Greater London Authority
	Metropolitan Police
	National Grid
	Sutton and Merton Primary Care Trust
	Thames Water PLC
	CABE (The Commission for Architecture and the Built Environment)

	Wandsworth Council
Schools	Holy Trinity CofE School Governing
National Groups	Coal Authority
	Living Streets – Pedestrians Association
	The National Trust
	The Theatres Trust
Local Groups	AFC Wimbledon
	Longthorton Re- Development Working Party
	Merton Priory Trust
	Sustainable Merton
	Tree Warden Group Merton
	Wimbledon Civic Forum
	Wimbledon Society
Residents Associations	Apostles Residents' Association
	Garth Residents' Association
	Raynes Park Residents' Association
	Raynes Park and West Barnes Residents' Association
	Village Residents' Association (Mitcham)
	West Wimbledon Residents' Association
	Wimbledon Independent Supporters Association
Private Companies	Andrew Pinchin Architects Ltd
	Key London Alliance
	La Salle Investment Management
	Newridge Trading Ltd
	MOAT Housing Association
	Sainsbury's Supermarkets Ltd
	Workspace Group PLC
	Wimbledon YMCA

Analysis of topic areas

3.3: Figure 4 illustrates the proportion of representations received for all of the policy areas in the Draft Core Strategy.

Figure 4 →



3.4: The main topic areas to receive comments, in order of hierarchy, were open space; the Spatial Strategy summary; housing; the spatial vision; the spatial objectives; design and infrastructure.

3.5: The Open Space topic received a total of 201 comments representing 64% of the total of representations received from this consultation period into the Draft Core Strategy DPD.

3.6: Figure 5 provides a detailed list of the policy areas' of the Draft Core Strategy that received the most representations.

Figure 5: Policy Area that Received the most representations		
Policy	No. of Comments	Percentage
Open Space	186	64% ¹
Housing	15	5%
Centres	11	4%
Design	10	3%
Infrastructure	10	3%
Mitcham sub area	9	3%

Although Open Space, Nature and Recreation – Policy 12 received the largest proportion of representations, over 50% of comments on this policy were regarding the support for a sports stadium specifically for AFC Wimbledon's return to the borough.

Analysis of Responses

3.7: As mentioned, in accordance with the 'test of soundness' as set out in PPS12 the questionnaire, which accompanied the summary documents, sets out six specific questions regarding the Draft Core Strategy in a reader friendly format; testing whether the document is justified, effective and able to be monitored.

3.8: To note, this consultation questionnaire allowed respondents to tick yes or no to indicate if they agreed or disagreed with the questions being ask with relation to the Draft Core Strategy DPD. Respondents were also provided with the opportunity to provide further comments. The majority of respondents failed to tick their preferred indicator (yes/no) and failed to provide comments to all questions detailed in the questionnaire. Reasons for this could be that respondents ticked their preferred indicator (yes/no) or provided comments only on issues in the Draft Core Strategy 2009 that really concerned them. It could also suggest that the respondents did not have any major issues with the policy or text content and thus agreed with the Council's Draft Core Strategy policy direction and content.

3.9: Despite, consultees not responding to all the questions in the questionnaire, Figure 6 does demonstrate that there were no major objections to the overall vision and strategy set out in the Draft Core Strategy.

3.10: In the extensive representations submitted, a large proportion of respondents did highlight if they supported/ did not support the policy that was of interest to them. The majority of representations generally supported the policy direction and content for the future use of space and development of land in the LB Merton and there were no significant objections to the Draft Core Strategy. The main issues highlighted by the representations included:

¹ 103 representations were made with regard to the return of AFC Wimbledon's return to LB Merton.

- χ Requests to make minor changes to policy, content and to the spatial maps;
- χ To take into consideration using or making references to existing and emerging LB Merton Strategies and other relevant documents, if appropriate; and to
- χ Take into consideration emerging national and regional guidances and policies, in particular, to refer to the significant changes in policy direction as set out in the Draft London Plan 2009 that is currently out for consultation. The significant draft policy changes include; changes to the affordable housing policy, protection backgardens and backland against development and the provision of smaller and affordable retail units.

3.11: Figure 6 provides a detailed summary of the main issues concerning respondents and the further actions currently being considered by the Council; identifying policies, text and areas that requires further work.

Key issues raised through research, government guidance or consultation results, with suggested changes

Suggested changes to the Draft Core Strategy DPD:

Key Issues raised through research, guidance or consultation results.

Section	Name of Sections	Suggested changes to the Draft Core Strategy DPD:
<p>Chapter 1-12 11 12</p>	<p>Various Chapters²</p> <p>GOL have asked that the Core Strategy vision contains more of the detail that is already in the policies themselves.</p> <p>Several respondents asked that ambiguous wording be clarified.</p> <p>More information should be available on population projections and demography</p> <p>The key diagram and sub area maps should be clearer and should contain more of the information that is found in the policies.</p>	<p>Most of the changes relating to these chapters are either as the result of changes being pursued to the 20 policies themselves, or to add clarity where wording is currently ambiguous.</p> <p>For example, the summary section will need to be amended in the light of amendments to the policies on which it is based.</p> <p>The Key diagram (and sub-area maps) will be made clearer and will represent more of what is already contained in the policies</p> <p>The sustainability appraisal section will be updated from the final sustainability appraisal report prepared in 2010. Similarly the Key Drivers and Evidence base will be updated with the latest information available in 2010.</p>

² Foreword From Councillor, Introduction and Background, Introduction and Purpose, Consultation, Sustainability Appraisal, Key Drivers and Evidence Base, Merton's Vision & Objectives, Portrait, Issues and Opportunities, Spatial Vision, Strategic Objectives, Key Diagrams, Strategic Objectives and Core Strategy Policy Matrix, Spatial Strategic Policies and the Spatial Strategy

13	Centres – Policy 1	<p>Changes resulting from draft London Plan 2009; emerging PPS6: town centres, Merton's Town Centre Health Checks 2009, Merton's emerging Economic Development Strategy 2009 and consultation results</p> <ul style="list-style-type: none"> • Clarity on London Plan issues including support for affordable shops, smaller shops • Some consultees including the Mayor of London asked for more information on how a District Centre at Colliers Wood would be delivered • Transport network in the town centres. Small shops and affordable retail shops. • Improving clarity on retail capacity of town centres and outside centres • Inclusion of police shops in policy. 	<ul style="list-style-type: none"> • Community Facilities: consider how best to take forward the Met Police's request to allow for police shops in town centres • Affordable Retail Shops: We will need to consider, as highlighted in the GLA responses, policy/text specifically for affordable retail units; the requirement for larger retail developments (over 2,500sqm) to contribute to the provision of smaller or affordable rental units as set out in the Draft London Plan 2009. Further guidance will be required from the GLA in considering how this requirement will be implemented in practice. It is intended for the London Plan to be adopted in 2011 therefore we would need to consider carefully in how to take this forward. • Formatting of chapters: We will move the chapter Centres- Policy to after the sub area policies as requested by GOL. • Reclassification of Colliers Wood: We will continue working with the GLA for the reclassification of Colliers Wood as a District Centre in the London Plan. As part of Merton's response to the Draft London Plan and as requested by the GLA, we propose highlighting current projects being pursued or explored in the Colliers Wood area (e.g. Wandle Valley Regional Park, site-specific issues etc) to show our support for District Centre status. • Clearer indication of retail capacity resulting from research and a clearer indication of what capacity would be expected within each town centre and outside centres
26	Sub-Areas	<p>General comments on need to improve clarity of diagrams and information</p>	<ul style="list-style-type: none"> • Spatial Maps for the sub areas: Need to be more informative and provide further clarity. • Figures for housing and housing split for sub areas: Would need to be updated to take into consideration changes to the Draft London Plan 2009.
15	Colliers Wood sub-area – Policy 2	<p>Research including town centre health checks, Mayor's draft London Plan</p> <ul style="list-style-type: none"> • GOL request to consider housing potential of Colliers Wood • Request for inclusion of reference to provision of cultural and sporting facilities including a new community multi-purpose sports stadium. • Traffic congestion in South Wimbledon and Colliers Wood. 	<p>No significant changes proposed beyond ensuring that the policy is clear and can deliver its aim.</p> <ul style="list-style-type: none"> • Improve links with the Wandle Valley sub area; • Further consideration of transport issues in and around Colliers Wood • Clarify impacts of London Plan approach to intensification and Environment Agency guidance on flooding for Colliers Wood • Further work on delivery options for Colliers Wood as a District Centre

16	Mitcham sub-area – Policy 3	<ul style="list-style-type: none"> • Providing further clarity in the spatial maps. • Extension of conservation area in Mitcham Town Centre. • Querying whether viability of the proposed environment costs (as stated in policy) and housing targets have been assessed. • Setting out individual housing targets for sub areas. 	<ul style="list-style-type: none"> • Negativity: Some respondents did highlight how negatively written parts of the sub areas descriptions were, in particular for the Mitcham Sub area. Therefore, in order to address this concern, we could consider in the Portrait to highlight the positive attributes of each of the sub areas. • Emerging economic development strategy impact on Mitcham • Retail capacity of Mitcham
17	Morden sub-area – Policy 4	<ul style="list-style-type: none"> • The need for regeneration in Morden Town Centre. • Impact of regeneration on the existing transport network. • Tall buildings, heritage and public realm. 	<ul style="list-style-type: none"> • Tall Buildings: We are working with English Heritage to finalise the background information needed on tall buildings and will update the policy accordingly. • National Trusts Conservation Management Plan: needs further consideration.
18	Raynes Park sub-area – Policy 5	<ul style="list-style-type: none"> • Sub-Area diagram accuracy and detail. • Loose use of terminology and the need for a glossary. • Town centre function and boundary, and protection of employment land and open space. • Key redevelopment sites in Raynes Park and the impact on the character of the centre. • Waste energy facility and its relationship with Strategic Objective 5. • Strategy aspirational and optimistic for the 20 year period. • Restriction of retail development at Shannons Corner. • Inconsistencies between the policy and text, and difficulty applying policies to the sub-area (e.g housing provision) and relationship with Delivery and Monitoring. • Transport projects, funding and the conflicts between pedestrians, cyclists and vehicles. 	<ul style="list-style-type: none"> • Sub-area diagram: We will consider modifying and updating the diagrams throughout the strategy where appropriate; to improve clarity and accuracy as part of future revisions to the Core Strategy. • Policy structure and linkages with Delivery and Monitoring: We will revise the structure of Policy 5 to include points (c) and (d) under 'Surrounding area of Raynes Park', and address the links between the wording of Policy 5 and the Delivery and Monitoring section of the chapter, and add clarification on the timing for review of the local centre boundary. • Transport: The draft Core Strategy sets out a policy to create environment that improves all transport modes and encourages sustainable transport. Any comments that relate to more immediate transport issues that can not be addressed by the Core Strategy have been forwarded to the relevant service area • Clarity on the impact on Raynes Park as a local centre of the cumulative effects of development • Clarity on approach to out of centre development with respect to the latest version of PPS6: Retail and the new draft London Plan

19	Wandle Valley sub-area	<ul style="list-style-type: none"> • Proposition of the Greyhound site for Wimbledon AFC. • Rewording of references to heritage and conservation. • Mentioning specific riverways i.e. River Gravenay. • Recognising the EU Water Framework Directive requirements. • References to individual heritage assets within the sub-area, including Merton Priory and Merton Abbey Mills. • Enhance cross-referencing between Colliers Wood and Wandle Valley Sub-areas in relation to heritage. 	<p>No significant changes proposed:</p> <ul style="list-style-type: none"> • Need for sporting facilities: No proposed changes as the Core Strategy already supports provision of a stadium, should any organisation be in a position to develop one • Recognising the EU Water Framework Directive requirements: and the ongoing work between Merton Council and the Environment Agency on flood risk management. • Referencing and amendments on heritage assets, conservation, ecology, rivers • Cross-referencing: We will consider including more cross-referencing between the Colliers Wood and Wandle Valley Sub-areas in relation to heritage assets in-line with the recommendations from English Heritage.
20	Wimbledon sub-area – Policy 7	<ul style="list-style-type: none"> • Sensitive residential character surrounding Wimbledon TC. • The need for a civic hall in Wimbledon and sporting facilities within the sub-area. • Presence of chain stores, need for small, independent retail units – reference Wimbledon Competitiveness Study. • Policy lacks direction, need a fresh ‘creative approach to planning for Wimbledon. • Policy too focussed on key redevelopment sites. • Concise positive and negatives points about Wimbledon needed in policy justification. • Sub-area delivery and monitoring lacks milestones. • Night time economy balance. • Plan is too shopping focussed. 	<ul style="list-style-type: none"> • Policy structure and direction: We will improve the clarity of the policy as in some parts the Council’s approach wasn’t easily understood, propose tightening up the wording, making the policy more concise and giving clearer direction of the Council’s intentions on issues including building heights, public realm issues, vision for Wimbledon • Small independent retail units: We will consider the need to encourage smaller retail units. Therefore we will consider specifically setting out in policy to encourage a mix of retail units, including smaller units. This could be supported by the LDF’s existing evidence base. • Need for sporting facilities: No proposed changes as the Core Strategy already supports provision of a stadium, should any organisation be in a position to develop one. • Delivery and Monitoring: We will review the Delivery and Monitoring Section of the Sub-Area policy following revisions to the structure of the policy. The delivery and monitoring section of the sub-area must be deliverable and flexible to allow for changing circumstances over the life of the plan period.

21	Design Policy 8	<ul style="list-style-type: none"> • Tall buildings Policy 8(c) and supporting evidence base. • Heritage references. • Design quality - 'secured by design' principles, and sustainability. • Borough character, Distinctive Areas of the Borough, and tree/townscape character study. • Dwelling conversions. • Design Policy evidence base documents. • Reference to housing quality and the London Housing Design guide. 	<ul style="list-style-type: none"> • Tall Buildings Policy 8(c): The policy will be updated to improve clarity in line with recommendations from GLA and English Heritage, and Merton's research into local character. • Design quality: The justificatory text will be updated to include reference to the London Housing Design Guide, including minimum space standards for new homes. Greater emphasis will also be given to designing out crime and 'secure by design' principles and sustainable development, with links to Climate Change and Transport Chapters. • Heritage references: The justificatory text to the policy will be updated to include reference to the <i>PPS15 Consultation Draft</i> and <i>English Heritage Conservation Principles - Policies and Guidance</i>, and we will consider further how PPS15 will impact on the Design Policy itself, and other areas of the draft Core Strategy including Strategic Objective 7. • Evidence Base Documents: The Delivery and Monitoring section of the chapter will be updated to identify that the relevant evidence base documents (SPG's) will be updated following adoption of the Core Strategy to adequately support Policy 8 – Design. • Sustainability Appraisal: The Sustainability Appraisal implications within the Design Chapter will be reconsidered taking into account the new policy directions within PPS15 Consultation Draft. A full copy of the Sustainability Appraisal will be forwarded to English Heritage for analysis and feedback.
22	Climate Change Policy 9	<ul style="list-style-type: none"> • Policy needs to be more stringent. • No reference to wider climate change issues such as food and energy security, biodiversity and flood risk. • Greater reference to the London Plan, in particular the Energy Hierarchy concept of development design and the need to prioritise site-wide and district CHP and CCHP systems in appropriate developments. • No minimum Code for Sustainable Homes requirement. 	<ul style="list-style-type: none"> • Emerging London Plan policy: The proposed changes to the London Plan means that the commercial development policy wording needs to change, to reflect the move away from renewables targets to CO2 reduction targets. • Further Merton-specific research needed into viability of climate change measures across different parts of the borough, and the impact of updates to national regulations. Depending on research results, this may inform changes to the policy approach. • Issues including food and energy security, biodiversity and flood risk are addressed throughout the plan as far as these changes can be effected through the planning system. The Council is also working on other initiatives (e.g. Low Carbon Zone, carbon trading) to reduce the impacts of climate change beyond issues regulated through the planning system.

23	Flood Management Policy 10	<ul style="list-style-type: none"> • Suggesting additional measures relating to flood risk emergency planning and mitigating risk. • Changing the name of the policy. • Recognising the EU Water Framework Directive requirements. 	<ul style="list-style-type: none"> • Flood mitigation: We will consider setting out additional measures relating to flood risk emergency planning and mitigating risk, including further recognition of the EU Water Framework Directive requirements. • Expanding on Env't Agency advice including changing the name of the policy, forging better links with utilities companies to address surface water flooding.
24	Waste Management Policy 11	<ul style="list-style-type: none"> • ensure policy principles are in line with other partner boroughs involved in the South London Waste Plan • ensure new waste apportionment figures from the draft London Plan are recognised in either the Core Strategy or the South London Waste Plan 	<p>Minor changes proposed to take account of the key issues, including the impacts of the new London Plan waste apportionment figures and emerging South London Waste Plan research</p>
25	Open Space, Nature and Recreation – Policy 12	<ul style="list-style-type: none"> • Specific information regarding supporting a sports stadium by AFC Wimbledon Supporters Club. • Development of Open Space for the Provision of Educational Facilities. • Managing and enhancing waterways. • Encouraging Wildlife movement through Green Corridors/ Islands. • The Protection of Trees. • The Protection of Backgardens and Backland from development. • Are the figures in Table 1 achievable and realistic. • Further minor amendments to Policy Chapter. 	<ul style="list-style-type: none"> • Sports stadium: As set out in Merton Council's previous consultation responses to this issue in 2007, the Core strategy must be deliverable to pass the Planning Inspector's examination.. The current draft Core Strategy supports a multi-purpose sports stadium, were an organisation to approach the Council with plans for a specific site. Without some form of financial or commitment in kind to a dedicated site from any organisation, we are not proposing to designate a site as part of policy. • Development of Open Space for the Provision of Educational Facilities: From the consultation results, we propose amendments to remove existing ambiguities towards the position that there may be a need to develop parts of open space for educational facilities under exceptional circumstances. A relatively low response was received on this issue. • The Protection of Trees: The inclusion of a 'Tree Strategy' will be incorporated in text to provide further information on the protection of trees. • The Protection of Back gardens and Backland from development: The 2009 draft London Plan (pg 69) states presumptions against development <i>where locally justified</i>. Merton's LDF will need to determine how this issue is addressed and consider requirements for developers to demonstrate how development proposals will meet the London Plan policy objectives (both the Draft London Plan 2009 and the London Interim Housing SPD 2009) regarding back garden and backland development. • Table 1: The indicators/targets in Table 1 will be reconsidered to establish if it should be retained on the basis of what is achievable and realistic. • For Further Consideration: Further text to support and provide references, where appropriate for allotments, managing and enhancing our waterways, trees and encouraging wildlife movement through green corridors/islands is required. We will also consider how to address issues such as food security most effectively

26	Housing policies 13-15	<ul style="list-style-type: none"> • Protection of backlands or gardens from development. • Request for the identification of specific locations for housing and considerations to reduce the need to travel. • Suggest updates to take into consideration the Draft London Plan 2009 proposals (including strategic target) and the London Plan Density Matrix. • The requirements to refer to relevant evidence base i.e. affordable housing viability study. • Concerns with the prescriptiveness of the policy. • WHAT ABOUT THE HOUSING RESEARCH – SLIDING SCALE ETC? 	<ul style="list-style-type: none"> • Consider revisions to the housing policies 13 and 14 to take account of changes proposed in the Draft London Plan including backland development, housing density matrix, potential new overall housing target and affordable housing target. • Most significant change proposed to Policy 14: housing choice, as result of draft London Plan, Merton's housing viability research and consultation results: new targets (40% affordable housing, 60:40 split. New approach in sliding scale). The new approach is being outlined in Appendix 2
27	Economic Development –Policy 16	<ul style="list-style-type: none"> • The application of flexible policy to allow different uses on scattered employment sites. • Development of hotels outside town centres and the requirement for an evidence to identify hotel needs in the borough. • Flexible policy for the release of land, designated as Strategic Industrial Land by the GLA, for other uses outside of industrial uses. 	<ul style="list-style-type: none"> • Consider implications of Mayor's draft London Plan, Mayor's Economic Development Strategy, Merton's emerging Economic Development Strategy and supporting research. • Scattered Employment Sites: The Council will provide further clarity to Policy 16 by developing policy further to include directing major offices towards centres and to protect scattered employment sites to the types of uses that are compatible with residential areas. • General presumption towards greater flexibility to allow other types of development on employment sites is not supported; this can be addressed on a site-by-site basis according to local circumstances.

28	Transport Policies 17-19	<ul style="list-style-type: none"> • Active Transport: Promote cooperating between cyclists and pedestrians. • Connectivity of cycle network. • Encouraging 'transport cycling'. • Public Transport: Improvements and accessibility for the mobility impaired. • Parking, Serving and Delivery: Clarity of car parking standards, reducing on-street parking and the amount of parking required for new developments and new or expanded Controlled Parking Zones (CPZ). • Rat running. • Issues with transport in specific areas, in particular for Raynes Park. 	No major changes to the Transport Policies are necessary but we will consider making minor changes particularly to the supporting text to clarify points raised by the respondents.
29	Infrastructure – Policy 20	<ul style="list-style-type: none"> • Social Infrastructure. • Local Care Centres. 	<ul style="list-style-type: none"> • Social Infrastructure: Need to provide further information in the policy to include more elements of social infrastructure, in particular, space for faith groups and multi – purpose community use. • Local Care Centres: More text will be added with regards to the proposed Local Care centres and how the Council is preparing a expansion strategy to meet the demand for school places.
32			
	Monitoring & Implementation	Greater connection needed between policies and monitoring – this is a key element of soundness	Update both this section on monitoring and the tables relating to each policy – have been reminded by GOL that the ability of a policy to be successfully monitored is a key test of soundness
	Infrastructure projects	There was general support to this table	Update table with new infrastructure projects that have emerged since June 2009, including those emerging from the Infrastructure and Implementation partner group

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Appendix 2 Borough Plan Advisory Committee: 07 January 2010

Proposed change of approach to affordable housing in Merton's Core Strategy

The current Policy 13 "Housing Choice" in Merton's draft Core Strategy (Sept-Oct 09) includes the following:

- Of schemes of over 10 homes, 50% should be affordable, having regard to economic viability
- Of those affordable homes, 70% should be socially rented, 30% intermediate
- In seeking the above we will have regard to site circumstances, including size, suitability, viability and other planning contributions

The Core Strategy clearly flags up that the large occurrence of schemes that are 100% affordable housing in relatively cheaper parts of the borough is inconsistent with the Council's aim of creating balanced communities.

Change of approach proposed towards the following elements

A 40% affordable housing target (as opposed to 50%)

Supported by both Merton's research and the new target in the draft London Plan

- The draft London Plan contains a numerical target, which equates to 40% of the total number of homes to be provided London-wide¹. Draft London Plan policy 3.12 says *Affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances, reflecting the borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG, and providing a robust basis for implementing these targets through the development control process.*
- We advise putting 40% as a borough-wide target in the affordable housing policy and starting site-specific negotiations at 40%. There are caveats within the policy (e.g. viability, site size, site situation, etc) which allow for negotiation upwards or downwards depending on the circumstances of individual planning applications.
- Going with a numerical target only (which would be approx 1,280 affordable homes over 10 years = 40% of the overall housing target of 3,200 over 10 years) is likely to have two effects:
 - It would create uncertainty with developers, which could be exploited to the detriment of the Council. It would allow for the argument that either Merton is on track to meet this target anyway

¹ Draft London Plan policy 3.3 sets a London-wide minimum target of 33,400 additional homes per year. Draft London Plan Policy 3.12 sets a London-wide minimum target for affordable housing of 13,200 per year, which is 39.5% of the 33,400

so that specific site does not need to provide new affordable homes, or alternatively that Merton is not on track to meet this target so that specific development should provide a very high proportion of affordable homes.

- Without specific schemes that will deliver large amounts of affordable homes, it would be very difficult to prove that Merton can meet a 10-year numerical target. Being clear about where the Council will start negotiations from There are caveats within the policy that allow for variation on what final provision is agreed on each site.
- Wandsworth Council submitted their Core Strategy cMay 2009 with a numerical affordable housing target only. Since then they have been required to undertake extra research on affordable housing – delaying their Core Strategy examination by more than 6 months - before they can proceed (their examination is to resume in February 2010.)
- Wandsworth have now amended their Core Strategy affordable housing policy to include reference to both the numerical borough-wide target and a percentage target for individual sites.
- In October 2009 Wandsworth flagged up in formal response to Merton's draft Core Strategy consultation that the affordable housing policy is not specific enough in terms of provision of affordable housing units on individual sites; this would be addressed by starting site negotiations at 40%.

Of that 40%, a borough-wide target of 60% socially rented and 40% intermediate (as opposed to 70:30 split)

From the draft London Plan

Being clearer about not supporting the creation of mono-tenure communities across the borough.

This may mean in practice that, where areas already dominated by affordable housing such as in some eastern wards, planning applications for 100% affordable housing schemes would not be supported. Planning permission in these parts of the borough may be granted on the basis of a maximum percentage (as well as a minimum) of affordable homes.

Equally this could also apply to maximum private sector tenure in other parts of the borough where the limited provision of additional affordable housing to date needs to be addressed.

Please note that the policy won't set a maximum percentage of tenure types; this would be determined on an individual site basis. It is more appropriate to address this on individual sites than borough-wide as variations could be needed on issues such as the location of the site, the mix of tenures proposed on-site, the mix of tenures available in the surrounding communities, economic viability, the need for other planning contributions specific to this scheme etc.

As a 15-year borough-wide plan, it would be very difficult to justify including a maximum percentage for any tenure type in the Core Strategy, thus restricting flexibility to consider individual site circumstances.

Adopting a sliding scale for affordable housing provision for schemes below the 10 unit threshold (1- 9 units) (new element)

Schemes below the threshold i.e. 9 units and below will be required to make cash contribution towards affordable housing provision. This contribution will be subject to what can be viably achieved, without hampering development. For clarity the policy will set out what the contribution will be expected below 10 units.

Officers are currently exploring the extent to which the sliding scale will apply e.g. whether it will start from 2 or 4 or 6 units and upwards, and what percentage contribution would be expected at each stage.

Why are we proposing a sliding scale approach?

Merton's Core Strategy must set out clearly **how the Core Strategy is going to be delivered**.

It will have to show **how** Merton is going to meet any targets, **where** (in terms of areas or sites) these targets can expect to be met, **who** will carry out the development, **when** this will be carried out, and **what** funding sources or streams will be used.

In previous years, developments providing 100% affordable homes have made a significant contribution towards meeting Merton's affordable housing target.

In addition, not much large-scale development takes place in Merton compared to other London boroughs. This is reflected in that we now have the second lowest housing target. Sites such as Plough Lane, Merton Abbey Mills, and Rowan High School are the exception; **most development is delivered incrementally from small schemes of less than 10 homes**.

Whether the target is numerical or percentage, Merton's Core Strategy must have to prove that Merton can build enough affordable homes over the lifetime of the plan to meet its share of London's overall target. Setting a percentage target for individual sites provides transparency for developers and affordable housing providers from the outset on how the policy will be delivered. A sliding scale approach demonstrates that the Council is maximising opportunities to meet its target. This is set within the context of a diminishing number of available 'large' sites and the aims of creating balanced communities. This will require the support of our affordable housing providers.

The policy contains caveats (viability, site size, site situation etc) that means that planning applications can be considered on a site-by-site basis. For example, if a site was heavily contaminated and the developer had to undertake significant

remediation work before building on it, the policy would allow for flexibility in asking for other planning contributions on the grounds of economic viability.

What are the alternatives to the sliding scale approach?

Without considering a sliding scale approach, it will be difficult to show that Merton can provide enough affordable homes in line with the London Plan target and to meet local needs. This is a risk to the soundness of Merton's Core Strategy.

Other boroughs provide affordable homes through developing large sites for new homes, a proportion of which are affordable, or by supporting 100% affordable housing schemes. In Merton, these options aren't as deliverable as there are fewer large sites and we are supporting a balanced mix of tenures.

Merton's housing viability study and dialogue with housing professionals supports the sliding scale approach of provision of affordable homes, towards the Council's overall aim of creating balanced communities. Alternative to this approach indicate the need for compromise on this aim.