

ENVIRONMENT AND REGENERATION DEPARTMENT

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Date: 07 October 2010

Dear Councillor,

Re: Agenda item 4 - Borough Plan Committee meeting 12 October 2010

Enclosed are the responses to the Core Strategy pre-submission publication – Appendix A to Agenda Item 4 for the above meeting.

The schedules of responses have been organised according to the order of each chapter of the Core Strategy. If you would like a paper copy of any of the original responses in their entirety, please don't hesitate to contact me using the contact .

The responses are also publicly available via Merton Council's website http://merton-consult.limehouse.co.uk/portal/planning/cs/cs_2010/cs_pub_stage_rep2010?pointId=770899 by following the "view comments" tab to the top right of every chapter.

If you have a copy of Merton's Core Strategy, please could you bring it to the meeting? I will bring some spare copies.

Please don't hesitate to contact me if you have any questions or would like more information in advance of the meeting.

I look forward to seeing you next Tuesday.

Regards,



Tara Butler
Spatial Planning Manager



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REPRESE NTOR	SUMMARY OF REPRESENTATION	RESPONSE	Suggested changes	Examination
GLA	Policies CS1 Colliers Wood (and CS 7: Centres)	The proposed Policy CS 1 and Policy CS 7 envision the growth of Colliers Wood over the plan period to become a District Centre in the London Plan hierarchy. The Council has appropriately adopted a plan-led approach to the consolidation and growth of this currently fragmented town centre and will require the adoption of a masterplan to manage the development of the centre. This will ensure that the growth of the centre addresses rather than compounds the current problems in the area. This approach is identified in Policy CS1, Policy CS 7 and the 'Delivery and Implementation' section and is consistent with strategic planning policy	N/A	Yes

REPRESE NTOR	SUMMARY OF REPRESENTATION	RESPONSE	Suggested changes	Examination
GLA	Policy CS1 Colliers Wood	<p>The supporting text for Policy CS 1 appropriately notes the proposed change in the draft replacement London Plan to the description of the Colliers Wood and South Wimbledon Area for Intensification (AFI). This change reflects the current evidence in relation to flood risk and further opportunities for intensification. It is noted that despite the constraints on development in the area arising from flood risk the Council has exceeded the London Plan and draft replacement London Plan housing targets for the area. The existing and emerging jobs targets have yet to be realised but the changes above, together with the proposed approach to Colliers Wood town centre, will support this occurring over the plan period.</p>	N/A	Yes

REPRESE Policy ref NTOR	SUMMARY OF REPRESENTATION	RESPONSE	Suggested changes	Examination
Sainbury Supermarkets Ltd (c/o Turley Associates)	<p>Support DPD:</p> <p>Sainbury's supports the re-designation of Colliers Wood from an urban centre/ out-of-centre retail park to a District Centre. It is considered that the existing Sainsbury's supermarket is an important part of the Colliers Wood centre, providing a considerate retail anchor, which significantly contributes to the vitality and viability of the centre. This should be acknowledged through the inclusion of the store within the Core Shopping Area of the new District Centre.</p>	<p>Following the adoption of Merton's Core Strategy, as detailed in policy, a masterplan for Colliers Wood setting out how the designation of Colliers Wood as a district Centre will be implemented and delivered. The adoption of the masterplan by 2012 will precede the district centre designation; Colliers Wood will only attain its District Centre designation on adoption of the master plan. As a major landowner, retailer and employer in Colliers Wood, Sainsburys will be involved in the preparation of the masterplan</p>	No changes proposed	
Comment ID: 18				

REPRESE Policy ref NTOR	SUMMARY OF REPRESENTATION	RESPONSE	Suggested changes	Examination
<p>Wispress Ltd (Indigo Planning) (ID: 470605)</p>	<p>On an overarching level, we support Policy CS1 in seeking to promote development which helps to improve the quality of local housing, especially in the South Wimbledon area. Furthermore, we welcome the Core Strategy's identification, at Figure 11.1, that housing is the primary land use in non-town centre locations within the Colliers Wood and South Wimbledon sub-area, particularly the area around South Wimbledon station. Furthermore, it is acknowledge in the document that South Wimbledon and Colliers Wood is an AFI, to which development should be focused.</p>	<p>Further to evidence of the Strategic Flood Risk Assessment (2008) and discussions with the GLA and the Environment Agency, parts of Colliers Wood are prone to flood risk and therefore any proposals for the development in Colliers Wood will need to take this into consideration as well as providing appropriate mitigation levels to support the development. Specific sites and levels of development will be set out in the Colliers Wood masterplan</p>	<p>No changes proposed</p>	
<p>Comment ID:13</p>				

REPRESE Policy ref NTOR	SUMMARY OF REPRESENTATION	RESPONSE	Suggested changes	Examination
Wispress Ltd (Indigo Planning) (ID: 470605)	We consider that this location, particular around South Wimbledon station and Colliers Wood is highly accessible and sustainable, and that housing development here should be promoted by the Council, in accordance with the aspirations of the London Plan. In this regard, the document should explicitly recognise the potential for sites in these 'residential' locations, currently in alternative uses, within the sub-area as being suitable for residential redevelopment of a suitable density (pursuant to their associated PTAL rating), a use identified as being compatible with the prevailing character of the area.			
Comment ID:13				

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REPRES POLICY ENTOR REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	Chapter 12 Policy 2/Chapter 12 and Table 27.2 and Para 18.43 Delivery & Monitoring: Explicitly assumes "the existing Wilson Hospital to expand and provide a range of services as the Wilson Local Care Centre" Does this need comment?	This matter will be addressed via a Statement of Common Ground between the PCT and Merton Council, which may propose changes to Merton's Core Strategy.	Under consideration	YES

REPRES POLICY ENTOR REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Crest Nicholso n (south east Ltd) (ID:4741 00)	Don't support DPD; not justified or effective. The figure identifies three Key Housing Sites. It is assumed that the eastern most Key Housing Site is the Former Rowan School. In order to provide certainty it is suggested that the figure is amended to explicitly name each of the Key Housing Sites identified on the figure.	Figure 12.1 Mitcham Sub Area is a map used for illustrative purposes only to demonstrate the Council's vision for the future use of space and the development of land for Mitcham for the next 15 years. It is a spatial map, and in order to ensure consistency with the illustrative maps of the other sub-areas, we should not include the specific names of sites that we expect to come forward for development. In accordance with PPS12: Local Spatial Planning (2008) this is to ensure flexibility throughout the plan period.	Under consideration - this request may improve clarity by repeating visually what is already in the text It would not materially change the Core Strategy	
Commen t ID: 84		In paragraph 12.8 in the justification text to this policy details a number sites that we are aware of that could come forward within the lifetime of the plan period (including sites such as Rowan High School, Mitcham Gas Works and Brenley Playing Fields) which is intended to accommodate a large proportion of the housing growth within the area. The council are currently working with key partners such as the Homes and Communities Agencies on these sites.		

REPRES POLICY ENTOR REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Merton Priory Homes (P A Ford) (Consult ation ID: 472933)	Merton Priory Homes (MPH) supports the DPD; in particular we support the approach to affordable housing and look forward to working in partnership with the council to improve and deliver much needed affordable housing in Merton. Recognises the need for Eastfields Station to form the driver for regeneration – we propose that the new rails station acts as the hub for housing regeneration in Mitcham. MPH owns several estates in close proximity to the station and would be keen to work with the council to develop a more comprehensive masterplan. Sutton/ Mitcham/ Tooting tram extension proposal would link Mitcham Town Centre directly to Eastfields and support regeneration objectives.	Support	No change proposed	
ID comment : 28				

REPRES POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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<p>Jeannie Benson (ID: 340147)</p>	<p>As part of you strategy, could you please do something about the dreadful reputation Mitcham has acquired as a social dumping ground in the last few years? It is generally recognised that Mitcham has always been regarded the poor relation of Wimbledon, but in the 20 odd years I have lived there I have never seen such an appalling decline of a once close knit community.</p>	<p>As highlighted, in the justification text to this policy, an SPD was adopted in 2006 for the regeneration of Mitcham town centre, however due to the level of fragmented land ownership in Mitcham, the delivery of the SPD is unviable. Merton Council supports the overall vision of the SPD and currently consider proposals for incremental development that help meet the overall objectives of SPD.</p>	<p>No change proposed</p>	
<p>Comment ID: 3</p>	<p>Mitcham is full of beautiful historic buildings and green spaces and should be regarded as a treasure and a place where people might aspire to live, as opposed to a place they cannot wait to leave. I don't think that new supermarkets or improved traffic systems are the answer to this dreadful problem.</p>	<p>As detailed in Policy 2: Mitcham sub-area the strategy for Mitcham is to improve the quality and mix of homes including affordable and private housing in Mitcham. In paragraph 12.8 details a number of sites that could come forward within the lifetime of the plan period (including sites such as Rowan High School, Mitcham Gas Works and Brenley Playing Fields) which is intended to accommodate a large proportion of the housing growth. The council are currently working with key partners such as the Homes and Communities Agencies on these sites.</p>		

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Andrew Grimes for PCT	Chapter 13 Policy CS 3	Morden Town Centre (e): Should include the redevelopment of Morden Road Health Centre which will need to be synchronised with housing developments in Morden.	Site-specific development of infrastructure where funding is available can be included in the Delivery and implementation section or monitoring but are not recommended for inclusion in the policy of a 15-year plan. This particular site will be included in the planning framework for Morden but it may also be appropriate to monitor its delivery through Merton Partnership's Infrastructure and Investment Board.	Under consideration	Yes
			Approach under consideration via Statement of Common Ground between Merton Council and the PCT.		

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REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
Andrew Pinchin	para 14.7 - proposed new homes	a. The DPD is not justified as the number of proposed new homes (500-600) is more than can be supported by the limited amount of land available for development in the area. A lower target would be more sound as it would be more appropriate for the area.	The housing capacity ranges set out for the sub-areas are indicative; they provide a guide to how the identified housing capacity is likely to be distributed across the borough. Robust evidence at regional and local level, including the Mayor of London's Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity envisaged for Merton over the plan period. The SHLAA took account of deliverability issues and development plan policy constraints such as protection of existing character and quality in identifying housing capacity. The indicative ranges for the sub-areas have been informed by assessment of a number of factors including pipeline capacity i.e. sites with planning permission	No change proposed	
Andrew Pinchin (continued)			(continued)The housing trajectory sets out how and when this capacity will be delivered and distributed over 15 years. In accordance with Government guidance and in acknowledgment of the significant contribution windfalls have contributed to Merton's housing provision to date, the housing trajectory and in turn the indicative ranges identified for the sub areas includes a windfall component		

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Andrew Pinchin	para 14.7 - proposed new homes	<p>b. The proposal that provision of new housing should include: ". conversion of existing single dwellings into multiple units" is not sound or justified and should be deleted. The area consists mainly of small to medium sized two storey houses which are not suitable for division into multiple units. Such units would not comply with Policy CS14 which requires the conversion of existing single dwellings to incorporate the re-provision of at least one family unit. It would conflict with Policy 5.15 which refers to the need to accommodate larger households, and with Policy CS8 which envisages that nearly 50% of future housing delivery should take the form of 3 bedroom units. The policy as proposed is inappropriate for the area. It would also lead to additional car ownership and cause unacceptable pressure on car parking in the area.</p>	<p>Para 14. 7 is not inconsistent with CS14. Policy requirements concerning conversions set out CS14 applies to suitable sites. .</p>	<p>No change proposed</p>	

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>Ignis Asset Mang Axa Real Estate (ID: 474466)</p> <p>Comment Id: 125</p>		<p>Ignis and Axa represent the landowners of the site identified as Bushey Road in Raynes Park and as such as significant landowners in LB Merton.</p> <p>We are concerned the site is proposed to be allocated as a SIL. This is inconsistent with the proposed designations of SILs within the adopted and emerging London Plan. They highlighted that in discussion with Tara Butler and following a review of this position with the GLA, it has been confirmed that this land which forms part of the Bushy Road Industrial Estate was not indented to form part of 'Beverly Way' Industrial Estate, which is a designated SIL in the London Plan 2008 and draft London Plan 2009. It has been advised that this site is a designated Locally Significant Industrial Sites as defined in the draft Core Strategy. It was therefore agreed with LB Merton that this error would be corrected by amending the Map on page 117 of the draft Core Strategy.</p>	<p>Figure 20.1: to be updated. This figure is indicative - land use designations should be considered from Merton's most recently adopted Proposals Map Merton's Economic and Employment Land Study update [ELS] (2010) which supports the protection of employment sites for continued employment uses, in particular, Locally Significant Industrial Areas and Strategic Industrial Locations. As part of the study ELS completed site assessment work on 150 individual sites (including the 16 designated sites and the site at Bushey Road Industrial Area [includes Beverly Way site]) out of circa 450 employment sites located throughout the borough; only 4 scattered employment sites were identified as unoccupied and unsuitable for employment uses (accounted for 0.32 ha of land) in the longer term.</p>	<p>Update Figure 20.1: Economic Development map to rectify this oversight and ensure that term Strategic Industrial Location and locally Significant Industrial Area is consistent throughout this Chapter</p>	

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>Ignis Asset Mang Axa Real Estate (ID: 474466)</p> <p>Comment Id: 125 (continued)</p>		<p>(continued) This change should be made accordingly. Whilst the site is allocated as an Employment Area in the adopted Plan and a LSIL in the emerging DOD, it is our view that the site should be removed from these designations and allocated as a mixed use development. The site is not a traditional employment site in so far as it currently comprises a large retail warehouse unit and is surrounded by other retail uses and sensitive development including housing and a school. Our proposals to allocate the site for mixed use development would therefore be more appropriate in this context.</p>	<p>Overall, there is up-to-date regional and local evidence showing that Merton's employment land is well occupied, has low vacancies, has high rents and as such should be retained for continued employment land use. The site at the Bushey Road Industrial Area (which includes Beverly Way) did identify the site as 'good quality' and recommended the potential uses of the site for continued B1, B2 and B8 (with the potential to accommodate bulky retail) uses and scored on one aspect only below average due to capability of adjoining uses as there is a school within close proximity to a school, residential area, Bushey road and A3. The site scored well with other aspects of the independent site assessment work including strategic access, local accessibility, proximity to urban areas and access to labour & services, development environmental constraints and take also into consideration market attractiveness, planning factors, barriers to delivery, potential uses, timescale/availability and contribution to Economic Strategy (2010).</p>		

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>Ignis Asset Mang Axa Real Estate (ID: 474466)</p> <p>Comment Id: 125 (continued)</p>		<p>(continued)The re-allocation of the site as a mixed use development opportunity could accommodate a wide range of employment generating uses to create significant benefits for Raynes Park, by diversifying the range of employment uses and jobs on the site and bringing forward associated environmental improvements. Having regard to the above we consider that the site's designation as an Employment area is unsound. It is no 'effective' since such unwarranted designation does not provide sufficient flexibility on the potential use or development of the site over the lifetime of the plan period. It is also not consistent with national or regional planning policy.</p>			

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>Workspace Group (ID: 473954)</p> <p>Comment ID: 72</p>		<p>Don't support DPD; not effective. Broadly support the policy however Policy CS 4 should also support the opportunity to regenerate and improve the Rainbow Industrial Estate (owned and operate by the Workspace Group). Given the age, type and quality of accommodate currently being offered (and the weak return it generates) twinned with the low employment levels generated by the existing uses, the Workspace Group is concerned that without substantial new investment the current site operation is unlikely to be sustainable in the long-term and is likely to decline, and with its proximity to great transport links, this estate should be regenerated. We can confirm that the Workspace Group would be willing to work with the Council to develop a bespoke policy document to promote the regeneration of this site.</p>	<p>We thank you for your comments and willingness to engage with the Council matters concerning Rainbow Industrial area and its ability to contribute towards businesses and employment in Raynes Park</p>	<p>No changes proposed</p>	

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>B&Q (ID: 472483)</p> <p>Comment ID: 31</p>		<p>Do not support DPD; consistent with national policy. Part (f) of Policy CS4 relates to out of centre development at Shannon Corner. The Criterion states that further out of centre retail development will not be permitted where this 'competes' with town centres. This is not consistent with national policy tests which require retail development outside town centres on non-allocates sites to be tested in sequential and impact terms. The test is not one of competition. There are already a number of established retail businesses in this location, some of which represent substantial retail investment. The growth or adaption of those businesses to prevailing market conditions or operational requirements should not be prohibited where proposals can be demonstrated to meet the sequential and impact tests as set out in PPS4.</p>	<p>"competes" is used in the context of resisting further out-of-centre development that would have an impact on the vitality and viability of nearby town and local centres, it is not meant for this term to be interpreted as using any method of 'competition test' which was previously omitted from the adopted PPS4: Planning for Sustainable Economic Growth. Changes will be proposed to improve clarity</p> <p>Merton's Economic and Employment Land Study update [ELS] (2010) supports the protection of employment sites for continued employment uses, in particular, Locally Significant Industrial Areas and Strategic Industrial Locations. As part of the study ELS completed site assessment work on 150 individual sites (including the 16 designated sites and the site at Burlington Road Industrial Area) out of circa 450 employment sites located throughout the borough; only 4 scattered employment sites were identified as unoccupied and unsuitable for employment uses (accounted for 0.32 ha of land) in the longer term.</p>	<p>proposed update to criterion F of Policy CS4 with the following minor change which is required to avoid misinterpretation of policy:</p> <p>To replace 'compete' with 'impact on the vitality and viability' of nearby town and local centres.</p>	

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>B&Q (ID: 472483)</p> <p>Comment ID: 31 (continued)</p>			<p>Overall, there is up-to-date regional and local evidence showing that Merton's employment land is well occupied, has low vacancies, has high rents and as such should be retained for continued employment land use. The site at the Burlington Road Industrial Area did identify the site as 'good quality' and recommended the potential uses of the site for continued B1, B2 and B8 uses (with potential to accommodate bulky retail) uses and scored above average due on all aspects of the independent site assessment work including strategic access, local accessibility, proximity to urban areas and access to labour & services, compatibility of adjoining uses, development environmental constraints and take also into consideration market attractiveness, planning factors, barriers to delivery, potential uses, timescale/availability and contribution to Economic Strategy (2010).</p>		

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>Parham Development (Comment ID: 64) ID: 473940</p>		<p>Don't support DPD; justified, effective and consistent with national policy.</p> <p>Details of the changes required necessary to make the policy sound: The policy should quality what is meant by employment uses through either reference to Use Classes (e.g. B1, B2, B8) if this is the intention, or through reference to the wider definition of economic development land uses as contained within PPS4. If the policy is qualified so that employment use is taken to mean this wider definition this is the only change required to the policy, as through doing so flexibility is provided for and the policy would be considered with PPS4.</p>	<p>Proposed changes to improve clarity by either inserting as a footnote or as text in the justification to the policy (by referring and adding a link to Policy 12- Economic Development) the definition of employment uses which will directly relate to the definition as set out in PPS4: Planning for Sustainable Economic Growth. By referring and adding a link to the economic development chapter will provide policy and guidance as to how the loss of employment land will be dealt with. Merton is designated in the adopted London Plan (2008 –as consolidated with changes since 2004), Industrial Capacity SPD (2008) and draft London Plan (2009); as a restricted borough for the transfer of industrial land into other uses. Merton Council completed an Economic and Employment Land Study update [ELS] (2010) which protected all our employment sites for continued employment uses, in particular, Locally Significant Industrial Areas and Strategic Industrial Locations.</p>	<p>Proposed update of criterion b of Policy CS4 with the following minor change which is required to add further clarity to the policy: To include in the policy as a footnote to the definition of employment uses as set out in PPS4 and in the justification a link and refer to the economic development chapter.</p>	

REPRESENTOR	Policy ref	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
<p>Parham Development (Comment ID: 64) ID: 473940 (continued)</p>		<p>(continued) IF the policy were to be amended so that it is made clear that employment uses only include those land uses within the B Use Classes, the wording of criterion b. needs to be qualified further in order to build flexibility into the policy. This is required to allow in certain circumstances the loss of such defines employment uses where evidence is provided that the contributed retention of a particular employment use is not viable or practical. Under this scenario the suggested change to criterion b. is "Resisting the loss of employment uses (defined as those falling within the B Use Classes) within Raynes Park Local Centre, unless it can be demonstrated that the continued retention of a site in employment use (as defined) is not viable or practical, and not in the overall best interest of the local centre.</p>	<p>(continued) As part of the study ELS completed site assessment work on 150 individual sites (including the 16 designated sites) out of circa 450 employment sites located throughout the borough; only 4 scattered employment sites were identified as unoccupied and unsuitable for employment uses (accounted for 0.32 ha of land) in the longer term. Overall, there is up-to-date regional and local evidence showing that Merton's employment land is well occupied, has low vacancies, has high rents and as such should be retained for continued employment land use. Policies in Merton's development plan set out how site by site applications for alternative uses will be considered on their own merits.</p>		

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Zbigniew Blonski	CS.5	<p>The policy does not match the Council's apparent support and ambition for the possibility of AFC Wimbledon relocating back to the borough on the most obviously potential site of the Wimbledon greyhound stadium.</p> <p>The policy should specifically include support for the redevelopment of the Greyhound Stadium, Plough Lane to provide a new football stadium and set out a range of appropriate enabling development to secure this and indicate that the provision of the stadium for AFC Wimbledon would be secured through S106 Agreement. A key part of the policy should also be an expression of the Council's commitment to secure this for the return of AFC Wimbledon to where it belongs - in Merton.</p>	<p>Para 21.8 states Merton Council's support for the provision of a sports stadium within the borough. Merton Council will work with any sporting organisation to explore potential viable options for new sports facilities.</p>	No changes proposed	No

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Wimbledon Society	Policy CS6	<p>(1) It does not include a policy to maintain or re-establish essential local services that form the basis of a proper town centre at the heart of a local community: This is considered to be "the most appropriate strategy"; Suggested change (h) New element of policy: "Supporting and re-establishing local services and facilities that help to form the identity and structure of a living town centre, at the heart of a local community";</p>	Under consideration	Under consideration	
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Wimbledon Society	Policy CS6	<p>(2) Nor does it include (diagram p 75) pedestrian links over rail tracks from Alexandra Road and Tabor Grove (policy CS6:G); Suggestion (g) Addition: Include the names of Alexandra Road & Tabor Grove in the list;</p>	<p>Policy CS18 parts a-d adequately encourages improving all pedestrian access throughout the borough. Merton Council is currently developing a Sustainable Transport Strategy and Local Implementation Plan that will sets out the council's proposals which will provide the mechanism to prioritise pedestrian and access initiatives to be delivered subject to funding</p>	No changes proposed	
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Wimbledon Society	Policy CS6 3) It does not address the issues of how major new development (offices, hotels, conference facilities etc) could be accommodated and provided without damaging the existing town centre, or encroaching on surrounding areas in order to expand the town centre	Policies CS.6 and CS.14, including paras 16.8 onwards set out how Wimbledon Town centre will accommodate new facilities via the redevelopment of existing sites	No changes proposed	
Wimbledon Society	Policy CS6 (4) No case is made for the proposal to accept tall buildings, which conflicts with the aim of respecting the local character (16.14), conflicts with the stated wish to create a "consistent scale of development", and is not considered to be the most appropriate of the design alternatives	Case made in Tall Buildings background document in conjunction with English Heritage	No change proposed	

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Wimbledon Society	Policy CS6	Suggested changes h2New element of policy: "Building heights will be limited, so as to establish a consistent scale of development ba eel on a range of curr ntly similar building heights, subject to townscape and historic characteristics"	Building Setting building heights on a broad scale in accordance with specific roof heights is contrary to design principles	No changes proposed	
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Wimbledon Society	Policy CS6	16.14 "location for major development." Omit from "potentially" to "should contribute to creating". New sentence: "Building heights will be limited to 6 floors up to a maximum of 20m eaves height, which would reflect heights now prevailing in the town centre. This aims to establish a consistent scale of development...." "...locations that may be sensitive to ller buildings" (ie not "tall");and those locations where taller buildings may impact..."	The Tall Building background paper assesses the suitability of Wimbledon town centre as a location for tall buildings. It considers scale and concludes there is potential to accommodate tall buildings complementary to the predominant height of existing buildings, given the existing precedence and the importance of Wimbledon as a major centre within the borough. Setting building heights on a broad scale in accordance with specific roof heights is contrary to design principles	No changes proposed	
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REPRESE NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATIO
Mark Leclercq	CS6	The draft LDF does not contain a Creative Forward Plan for Wimbledon Town Centre or Wimbledon Village and the public's comments during two years of consultation have been ignored. The draft LDF contains a collection of vague statements of intent for which there is no accountability. [specific details in full representation]	The Core Strategy is a borough-wide strategic plan for the borough, and is one of a 'suite' of LDF documents. While the Core Strategy provides the overarching vision and objectives for each sub-area, it will be for other plans to set out the detailed guidance to take these forward, if this is considered necessary.	No changes proposed	

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<p>CB Richard Ellis on behalf of Newridge Trading</p>	<p>Figure 16.1</p>	<p>Figure 16.1 illustrates the extent of the Wimbledon sub-area, and the extent of the broad locations for various land-uses. It is insufficiently clear from Figure 16.1 whether Newridge Trading's site (77-91 Hartfield Road) lies within the geographical extent of the area defined as 'Supporting vibrant major town centre while protecting residential surrounds', or whether it is within the residential area. It is not made sufficiently clear from the supporting text, that in line with National Policy residential use will be supported within this area defined as 'Supporting vibrant major town centre while protecting residential surrounds'.</p>	<p>Figures and maps within the Core Strategy are indicative and show broad policy direction. Specific policy designations are set on Merton's most recently adopted proposals map (2003)</p>	<p>No change proposed</p>	
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CB Richard Ellis on behalf of Newridge Trading	Policy CS6	<p>Policy CS6 seeks to ensure that Wimbledon continues to develop and maintain its position as a diverse Major Centre offering excellent shopping, business and cultural facilities. It is considered that residential accommodation should also be added to this list, on the basis that PS3 (paragraph 10) states that the planning system should deliver, inter alia, "housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure." As paragraph 16.14 of the draft Core Strategy notes, "Wimbledon has the highest level of public transport accessibility in the Borough and this makes the centre a sustainable location for major development."</p>	Paragraph 16.16 and Table 17.2 considers residential accommodation suitable in Wimbledon town centre..	No changes proposed	
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Andrew Pinchin	16 Wimbledon Sub-Area - Policy 6 para 16.18/16.19	<p>The principles of public realm improvement, reducing street clutter, improving paving / street furniture and improving pedestrian access and movement - as set out in paragraphs 16.18 and 16.19 - are sound but should be applied to the whole borough, not just to Wimbledon town centre. As such they should be included as an additional policy in the section Design - Policy CS14 - as over-arching requirements for all parts of the borough. The DPD is not sound if restricted only to Wimbledon Town Centre.</p>	Under consideration		
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REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
<p>CB Richard Ellis on behalf of Newridge Trading</p>	<p>Table 17.2</p> <p>Table 17.2 states that, amongst other things, "some" [our emphasis] residential development will be permitted in Wimbledon Town centre, where densities are commensurate with its excellent public transport access. Newridge Trading is of the view that this conflicts with Strategic Objective 3 of the Core Strategy, which is to provide new homes and infrastructure within Merton's town centres and residential areas, and that the reference to "some" should be deleted from Table 17.2.</p>	<p>SO.3 does not conflict with Table 17.2</p>	<p>No change proposed</p>	

REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	<p>Table 17.2 provides a summary of town centre aims. However should also include an approach to non-retail uses, including those which encourage 'unhealthy' lifestyles (takeaways, betting shops) and community uses, including healthcare and wider services (co- location of services in accessible locations).</p>	<p>Table 17.2 provides a summary of town centre aims that are detailed in each of the sub-area policies. Approaches to healthy/ unhealthy uses are already underway via a co-ordinated approach with partners (e.g. cumulative impact zone for alcohol in Wimbledon Town Centre, licencing for gambling establishments etc. Case law has overtaken planning policies with regard to hot food takeaways and following the adoption of Merton's Core Strategy, the Council will consider whether specific guidance can enhance this.</p>	<p>No change proposed</p>	

REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Filgroup (ID.47445 7)	Para 17.14 of Policy CS7	Not 'sound' (effective, justified and consistent with national policy) or 'legally compliant'. Paragraph 17.14 is not consistent with Policy CS7 and PSS4: Whilst Policy CS7 is consistent with PSS4 by confirming that proposals for 'new town centre type uses' outside town and local centres' must comply with the sequential approach impact test. Paragraph 17.14 also applies this approach to neighbourhood parades. Annex B of PSS4 clearly states that 'small parades of shops of purely neighbourhood significance are not regarded as centres for the purpose of statement'.	In accordance with criterion of Policy EC3 of PPS4: Planning for Sustainable Economic Growth, local authorities are allowed to consider setting thresholds for both edge-of-centre and out-of-centre retail development which should be subject to an impact assessment under EC16.1; including setting geographic areas for this to apply.	Under consideration
Comment ID: 122			Currently figure 5.1: Borough Shopping Facilities as detailed in Merton's adopted UDP shows 'areas deficient in local shops' (based on a lack of facilities within 1 kilometre). Excluding Wimbledon and Mitcham Common, there are no areas in the borough which are pinpointed as areas deficient in local shops. Policy TC.1 and Policy S.3 of Merton's adopted UDP (2003) defines small-scale development as development under 500m2.	Yes

REPRESENTOR	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Filgroup (continued)
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(continued) As such paragraph 17.14 of the Core Strategy is not consistent with national policy. Furthermore paragraph 17.14 also identifies proposals above 280 sqm outside town and local centres. This threshold was previously set as 500 sqm in the Merton UDP. There is no justification as to why a different threshold has been applied for the Core Strategy. We consider that the previous threshold should be re-instated. As drafted part B) of Policy CS7 that there should not be a significant adverse impact on the vitality and viability of nearby centres.

(continued) However the intention with setting the threshold for requiring impact assessment of 280sqm which is based on the Sunday Trading Act 1994 (as amended) which regulates the trading hours of large shops ensures that shops which meets the every day shopping needs of residents (not weekly shopping needs) are located within walking distance of their residents. Paragraph 17.14 of the Core Strategy sets out that impact assessment may be required on sites considered by the council that would have a significant impact on existing sites in the borough. Therefore, it is intended for this requirement to be requested by Development Control, if applicable and necessary, on a site-by-site basis, depending on retail provision in the area and other characteristics set by policy.

REPRESENTOR REFERENCE	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Filgroup
(continued
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(continued) It is considered necessary to propose this threshold for retail developments outside of existing centres as the borough is quite small (only 37 square miles), all the major, district, local centres and neighbourhood parades and existing shops are located within walking distance of residents. Merton's town centres lose trade to out of centre locations. It is intended for Merton's forthcoming Retail and Town Centre Capacity Study and an emerging briefing note with evidence identifying any area's deficient in local shopping to justify the Council's policy position further.

REPRESENTOR REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
Metropolitan Police Authority (ID: 474424)	<p>Don't support DPD.</p> <p>Policy CS7 defines the hierarchy of town centres within the borough and notes that the Council will support new development in these centres commensurate with their scale and function. It states a mix of uses will be encouraged to located in centres; a list of suitable uses is outlined.</p> <p>Policy 3A.18 of the London Plan: Protection and enhancement of social infrastructure and community facilities, states that policies in DPDs should address the needs for social infrastructure and community facilities, including policing facilities, within easy reach by walking and public transport for the population that use them. In addition the supporting ext to policy 2.15 of the merging London Plan, in section 2.64, states that 'polices shops' are a suitable use for town centres.</p>	<p>Policy CS 7 states that a mix of appropriate uses will be encouraged to locate in the centre including other uses; which contribute to the vitality and viability of centres.</p> <p>The London Plan and Merton's Core Strategy (once adopted), will form the development plan for the borough. National guidance PPS12: Local Spatial Planning (2008) makes clear that the Core Strategy DOD should not just simply 'reiterate' or 'reformulate' national or regional policy.</p> <p>In the justification text to this policy 'town centre type uses' are defined as set out in national guidance PPS4: Planning for Sustainable Economic Growth (Dec 2009).</p> <p>Therefore, although not specifically mentioned in the Core Strategy, 'police shops or 'social infrastructure' would come under the umbrella term 'other uses' and thus policy is in accordance with national and regional guidance.</p>	

REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	REQUESTED TO ATTEND EXAMINATION?
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Metropolitan Police/Service/Authority (ID: 474424)	(continued) It is therefore recommended that this list is altered to include police facilities and other social infrastructure in line with the structure plan and emerging structure plan. This will ensure that the emerging Core Strategy will reflect the strategic development plan and can be judged 'sound' in this regard. Recommended Alteration (in bold and italics): 'A mix of appropriate uses will be encouraged to locate in the centres, including shopping, restaurants, leisure, recreation, entertainment, cultural, offices, social infrastructure and other uses which contribute to the vitality and viability of centres, in accordance with the sub-area policies set out in the Core Strategy'.		
Comment ID: 99 (continued)			

REPRESENTOR REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
Blackrock Blackrock (ID: 473911)	<p>Planning consultants acting on behalf, owners of Plough Lane Retail Park</p> <p>Issues with the threshold upon which impact assessment is required and object as to how the Council defined the threshold particularly for large bulky goods.</p>	<p>Regarding the issue that Merton may seek to require impact assessments for any retail proposals above 280 sqm outside of town and local centres please see Council Officer response to Filgroup (ID. 474457; Comment ID. 122).</p>	<p>Under consideration</p>
Comment ID: 56	<p>The arbitrary use of the Sunday Trading Act definition of a 'large shop' in defining the floorspace threshold clearly does not accord with this best practice PPS4 guidance and is not based on any relevant planning policy retail impact evidence for the borough. Furthermore, in considering the requirement for an impact assessment, Policy CS7 and its supporting justification text make no distinction between floorspace for Bulky goods and other forms of retail more suited to town centre locations.</p>	<p>Policy TC.1 and Policy S.3 of Merton's adopted UDP (2003) defines small-scale development as development under 500m2. However our intention with setting the threshold for requiring impact assessment of 280sqm which is based on the Sunday Trading Act 1994 (as amended) which regulates the trading hours of large shops ensures that shops which meets the every day shopping needs of residents (not weekly shopping needs) are located within walking distance of their residents. Paragraph 17.14 of the Core Strategy sets out that impact assessment may be required on sites considered by the council that would have a significant impact on existing sites in the borough. Therefore, it is intended for this requirement to be requested by Development Control, if applicable and necessary, on a site-by-site basis, depending on retail provision in the area and other characterist</p>	

REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
Blackrock Blackrock (ID: 473911)	(continued)We also note that the policy CS7 does not distinguish between new out of town retail development and existing sites in meeting the shopping needs of the borough. Extensions to existing retail floorspace may be required as part of proposals to refurbish/ regenerate such sites and to accommodate non food retailers for which town centre sites may not be appropriate.	(continued) It is intended for Merton's forthcoming Retail and Town Centre Capacity Study and an emerging briefing note with evidence identifying any area's deficient in local shopping to justify the Council's policy position further..	
Comment ID: 56 (continued)	In conclusion, we do not consider policy CS7 to be sound, as the 280 sqm retail floorspace threshold for which impact assessments are required for out of town development is not justified. We consider an alternative retail floorspace threshold of 1,000 sqm to be more justified, effective and consistent with national policy, as this would reflect the accepted definition of major development as defined by the 'Merton Rule', which is used already by local authorities, including Merton.	The site at the Plough Lane Industrial Area did identify the site as 'average quality' and recommended the potential uses of the site for continued B1, B2 and B8 (with the potential to accommodate bulky retail) uses and scored on one aspect only below average due to proximity to urban areas and access to labour & services (although being 700m from Colliers Wood town centre) and development and environmental constraints (located in a floodzone, conservation area, site of importance for nature conservation, archaeological priority zone and the large pylons on site).	

REPRESENTOR REFERENCE	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Blackrock Blackrock (ID: 473911)		(continued) The site scored well with other aspects of the independent site assessment work including strategic access and compatibility of adjoining uses and take also into consideration market attractiveness, planning factors, barriers to delivery, potential uses, timescale/availability and contribution to Economic Strategy (2010).		
Comment ID: 56 (continued)				
Sainsbury Supermarkets Ltd (c/o Turley Associates) ID: 355997	Sainsbury's support the re-designation of Colliers Wood from an Urban Centre/out-of-centre Retail Park to a District Centre. We recognised the Council's aspirations to regenerate Mitcham and Morden District Centre. However, this should not be at the expense of other centres such as Colliers Wood and should not result in these centres being sequentially preferable in terms of retail development over others within the Borough.	The Core Strategy does not state that regeneration of other town centres in the borough will not overshadow and will not be at the expense of other town centres such as Colliers Wood. As detailed in response to your comment ID: 355997 (above in the Colliers Wood sub-area section), a Masterplan for Colliers Wood will detail how the designation of the centre as a district centre will be implemented and delivered, prior to the Mayor of London considering redesignating the centre.	No change proposed	Yes
Comment ID: 17				

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society	CS.8 Housing Choice	<p>Unsound:It does not accord with current national requirements that all social housing built with public funding should comply with specified minimum floorspace standards.New element of policy: "Require affordable housing to comply with the minimum floorspace standards of the appropriate public funding body." Note that, although there is mention of all residential development complying with minimum space standards in CS14 (d/a), affordable housing now has specific standards.</p>	<p>Not necessary for inclusion in local planning policies</p>	<p>No changes proposed</p>	<p>Yes</p>
Wimbledon Society	CS.9 Housing provision	<p>Not justified: there is no evidence provided to show that additional housing on the scale proposed can be provided in Wimbledon and Raynes Park (the Society's prime area of interest) without damaging existing character and environmental quality, both in conservation areas and elsewhere; or leading to unacceptable loss of open and green spaces.</p>	<p>The housing capacity ranges set out for the sub-areas are indicative and serve to providing a guide to how the identified housing capacity is likely to be distributed across the borough. Robust evidence at regional and local level, including the Mayor of London's Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity envisaged for Merton over the LDF Plan period. The SHLAA took account of deliverability issues and development plan policy constraints such as protection of existing character and quality in identifying housing capacity.</p>	<p>No changes proposed</p>	<p>Yes</p>

REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Wimbledon Society
(continued)

The indicative ranges for the sub-areas have been informed by assessment of a number of factors including pipeline capacity i.e. sites with planning permission. The housing trajectory sets out how and when this capacity will be delivered and distributed over the LDF Plan period. In accordance with Government guidance and in acknowledgment of the significant contribution windfalls have contributed to Merton's housing provision to date, the housing trajectory and in turn the indicative ranges identified for the sub areas includes a windfall component. The Core Strategy is a high level strategic document and therefore inappropriate for identifying specific site allocations.

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society	CS.9 Housing provision	<p>Not effective Without an indication of how this amount of housing can be provided, there is potential conflict with, for example, the design policies that aim (CS14/b4) to respect local character, and therefore is not considered deliverable; Also in potential conflict with open space policies (CS13) which aim to protect open spaces. As Figure 18.1 shows, the proposed housing trajectory is not properly supported and relies excessively on windfall sites</p>	<p>The housing capacity ranges set out for the sub-areas are indicative and serve to providing a guide to how the identified housing capacity is likely to be distributed across the borough. Robust evidence at regional and local level, including the Mayor of London's Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity envisaged for Merton over the LDF Plan period. The SHLAA took account of deliverability issues and development plan policy constraints such as protection of existing character and quality in identifying housing capacity.</p>	No change proposed	Yes

REPRESENTOR	POLICY SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Wimbledon Society
(continued)

(council officer comments continued) The indicative ranges for the sub-areas have been informed by assessment of a number of factors including pipeline capacity i.e. sites with planning permission. The housing trajectory sets out how and when this capacity will be delivered and distributed over the LDF Plan period. In accordance with Government guidance and in acknowledgment of the significant contribution windfalls have contributed to Merton's housing provision to date, the housing trajectory and in turn the indicative ranges identified for the sub areas includes a windfall component.

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society	CS.9 Housing provision	For the Policy to be justified, additional material is required to demonstrate how the sub-areas are indicative and serve to additional housing is to be accommodated, and what effect this has on the locality, on local character, and on local greenspace. To be convincing, this should include examples of specific locations.	The housing capacity ranges set out for the sub-areas are indicative and serve to providing a guide to how the identified housing capacity is likely to be distributed across the borough. Robust evidence at regional and local level, including the Mayor of London's Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity envisaged for Merton over the LDF Plan period. The SHLAA took account of deliverability issues and development plan policy constraints such as protection of existing character and quality in identifying housing capacity.	No changes proposed	Yes

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society (continued)			<p>(officer comments continued) The indicative ranges for the sub-areas have been informed by assessment of a number of factors including pipeline capacity i.e. sites with planning permission. The housing trajectory sets out how and when this capacity will be delivered and distributed over the LDF Plan period. In accordance with Government guidance and in acknowledgment of the significant contribution windfalls have contributed to Merton's housing provision to date, the housing trajectory and in turn the indicative ranges identified for the sub areas includes a windfall component.</p>		

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
<p>CB Richard Ellis on behalf of Newridge Trading</p>	<p>CS.9 Housing provision</p>	<p>Newridge Trading welcomes the flexibility within criterion (f) of Policy CS8, which states that "in seeking affordable housing provision we will have regard to site characteristics such as site size, site suitability and economics of provision such as financial viability issues and other planning contributions". It is critical that such flexibility is in-built within the policy to seek to ensure the deliverability of schemes involving a component of residential use, however it should be made clear that this flexibility will be applied to all sites (i.e. whether over or under 10 dwellings — criteria (d) and (e) of Policy CS8, respectively). The need to have regard to site-specific circumstances and viability is an important material consideration that must be taken into consideration when determining affordable housing provision for a particular site.</p>	<p>The policy is justified. The flexibility concerning the seeking of affordable housing provision is clearly set out in point (f) which relates to all affordable housing provision irrespective of the size of the site.</p>	<p>No changes proposed</p>	<p></p>

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	CS9 Housing Provision	Matching of primary care capacity is made difficult by the lack of clarity of development sites and the PCT would appreciate greater clarity on the location of development sites.	Noted. While no new housing sites are proposed in Merton's Core Strategy, the evidence for the Core Strategy does identify a few sites which currently have planning permission or planning intention for new homes. These numbers are reflected in Policy CS.9. The PCT is a member of Merton Partnership's Infrastructure and Investment Board which does and can continue to meet quarterly to discuss site-specific issues over a rolling 3-5 year timeframe. This will also feed in to the delivery and monitoring of the Core Strategy and demonstrates an effective and flexible approach to the delivery of new housing and associated infrastructure.	No changes proposed	Yes

REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Pinchin	18 Housing Para 18.29 page 97	<p>The DPD is not sound as it is not flexible to deal with changing circumstances throughout the lifetime of the plan period.</p> <p>Specific current figures relating to housing affordability in the area should not be included in the DPD, as market conditions are likely to change and render these figures not relevant. Average current earnings are around £25,000, with only 10% of the population currently earning more than £50,000 - thus owner occupation is currently unaffordable to approximately 90% of the population on the criteria given.</p> <p>The lack of affordable housing for sale to any household earning less than £50,000 per annum gross (also at para 18.21) is subject to market forces and should not be a matter for local authority intervention or manipulation.</p>	<p>Paragraph 18.29 helps to set out the justification for seeking affordable housing specifically for London and the south east. It does not set out criteria on which affordability will be judged.</p>	No changes proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Pinchin (continued)		(continued from above) In most of Europe the rental market has always been dominant over owner occupation and this may become the case in the UK. There should not be a presumption of owner occupation as a right, and this should be left to the free market. Paragraph 18.29 is not sound or effective (flexible) and should be deleted. Proposals to increase housing stock within the borough should ensure that a range of rental accommodation of different sizes and tenures is available, thus allowing the market to find its own level and offer affordable rental property.			

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Pinchin	18 Housing Para 18.20 page 96	<p>The DPD is not sound as it is not justified. Where the local authority wishes to subject proposals to independent examination, the local authority should pay for this. The final sentence of paragraph 18.20 'We may seek payments from applicants for the cost of independent assessments' is not justified and should be deleted. Reason: The requirement for developers to provide residual land value viability assessments is expensive and time consuming, when they have many other parameters to consider when trying to produce an economic scheme. The local authority is not justified in seeking payment for an assessment which is the requirement of the LA.</p>	<p>The policy is justified. As set out in Policy CS8 Housing Choice (f) and further in paragraph 18.20, the need for developers to undertake or supply independent viability assessments is only where the developer is contending that their scheme cannot meet the policy requirements of CS.8. If the scheme meets the requirements of CS.8 without contention, then there will be no need to undertake such assessments.</p>	No changes proposed	
Andrew Pinchin	Policy CS8 Housing page 92	<p>Specific conditions proposed in the DPD are unjustified as they are too restrictive, are contrary to free market principles and will deter development in the private sector by making schemes not viable. [details in full rep]</p>	<p>As detailed in Merton's Affordable Housing Viability Study 2010, policy CS.8 housing choice is justified. Policy CS.8 criterion (f) allows for site circumstances such as site size, site suitability and the economics of provision such as financial viability and other planning contributions to be taken into account. The policy is justified, effective and flexible.</p>	No changes proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
GLA	CS.8 Housing Choice	The proposed drafting of Policy CS 8 ('Housing Choice') is in general conformity with the London Plan and would be in general conformity with the draft replacement London Plan. The Council, in setting the borough-wide target which is expressed as both a percentage and figure, has had regard to the relevant strategic policy requirements, including those set out above, and the most up-to-date strategic and local evidence on housing provision	Noted	No changes proposed	Yes
GLA	CS.8 Housing Choice	The Council should reconsider the proposed wording of Policy CS 8 (c) to remove the reference to the "London Plan draft replacement plan". The target in this policy is the Borough's target, supported by the most up-to-date strategic and local evidence, and is not merely a repeat of the strategic target, which is set out in the London Plan	Agreed	To reconsider the proposed wording of Policy CS 8 (c) to remove the reference to the "London Plan draft replacement plan"	Yes

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
GLA	CS.9 Housing provision	The London Plan (Table 3A.1) identifies a housing provision target for Merton of 3,700 homes (370 per annum) for the period 2007/8 to 2016/17. The draft replacement London Plan (Table 3.1) includes new targets for housing delivery for the borough. The proposed ten year target for Merton is 3,200 with an annual monitoring target of 320 new homes. The Council has, in agreement with the GLA, taken the draft replacement London Plan target and rolled it forward to 2026 to cover the 15 year timeframe of the Core Strategy, giving it a target of 4,800 net new homes between 2011 and 2025.	Noted	No changes proposed	Yes

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
GLA (continued)		<p>(continued from above) This is set out in Policy CS 9 ('Housing Provision'), which further breaks this figure down into indicative sub-area targets for different parts of the Borough. This approach is supported since, whilst the new target is inconsistent with that in the London Plan, it reflects the target in the draft replacement London Plan, which is at an advanced stage, and importantly the most up-to-date strategic and local evidence on housing provision. That being the case it would not cause significant harm to the implementation of strategic planning policy.</p>			

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
GLA	CS.9 Housing provision and CS.8 Housing Choice	<p>It is noted that Policy CS 9 (a) states that the Council will not support proposals that result in a net loss of residential units. This requirement is repeated in Policy CS 8 (a). The requirement is broadly consistent with the requirements of London Plan policies 3A.15 and 3A.16 and draft replacement London Plan Policy 3.15 but the repetition of the requirement in both Policy CS 8 (a) and Policy CS 9 (a) would appear unnecessary. Furthermore the proposed wording would benefit from the addition of the words "... including affordable housing units" at the end of the paragraph to ensure clarity of intent and consistency with strategic planning policy</p>	Agreed	<p>Remove repetition in either Policy CS 8 (a) and Policy CS 9 (a). Add wording "...including affordable housing units"</p>	Yes

REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Merton Priory Homes	CS.8 Housing Choice	We support the council's approach to setting affordable housing targets on private development sites and would encourage a flexible approach to target setting where no Social Housing Grant is available. The option to deliver a lower percentage of affordable housing with no grant will facilitate a pipeline of sites and produce a reduced level of affordable housing in preference to stifling development by insistence on hard targets and the risk of discouraging housing development	The policy is justified. The flexibility concerning the seeking of affordable housing provision is clearly set out in point (f). Merton's Affordable Housing Viability Study demonstrates that the council's affordable housing requirements are viable in the absence of Social Housing Grant.	No change proposed	No
Merton Priory Homes	CS.8 Housing Choice	We support the proposal of payment of commuted sums on developments less than 10 units — we suggest that these funds be diverted to Registered Providers (RP's) in lieu of grant to assist in meeting affordable housing delivery targets	Noted	No changes proposed	No

REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Merton Priory Homes	CS.8 Housing Choice	We support the use Merton's 2010 Strategic Housing Market Assessment Study (Merton SHMA) to evidence the future housing needs of the council. The current economic climate and anticipated reduction in housing grant will reduce housing supply in the next few years and planning policies should encourage and promote the best use of existing housing and sites owned by RPs.	Noted	No changes proposed	No
Indigo Planning on behalf of Wisepress Ltd.	CS 9 Provision	We support the allocation of 500-600 new homes to Colliers Wood and South Wimbledon. Following on from this, and given the significant environmental factors identified in the area which may have the potential to restrict development, i.e. flood risk issues, we would expect that the Council will adopt a positive and proactive approach to proposals for residential development in the area, if they are shown to be deliverable and will help to meet housing targets.	Noted. The indicative range for Colliers Wood and South Wimbledon of 500-600 new homes is subject to environmental factors, particularly flood risk. Specific development proposals within this sub-area will need to demonstrate how they would overcome flooding constraints. The Council is adopting a proactive approach by working jointly with key deliverers and stakeholders in the preparation and adoption of a masterplan to define the boundary for the Colliers Wood/South Wimbledon Area for Intensification and set out how the designation of Colliers Wood as a District Centre will be implemented.	No change proposed	Yes

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Indigo	CS 8	<p>Policy CS 8 should, however, be less specific in its requirements relating to the provision of affordable housing. In particular, we object to the requirement that all new residential development in Merton should provide 40% of new housing as affordable housing. We consider that this target is too rigid to respond to site specific constraints and viabilities of development. The Draft Replacement London Plan and Draft London Housing Strategy are moving towards Boroughbased targets, which are to be applied flexibly to individual schemes, based on viability, individual site considerations and the need to encourage rather than restrain development. The Council's policy should reflect this approach. The very specific detail sets out in the Core Strategy document promotes an inherently inflexible approach to the consideration of development proposals and to the proportion and mix of affordable housing, which should be determined on a case by case basis in light of local housing need, site constraints and viability considerations.</p>	<p>The policy is justified. Flexibility concerning the seeking of affordable housing provision is clearly set out in point (f) which relates to all affordable housing provision irrespective of site size. Furthermore paragraph 18.20 provides advice on the role and use of financial appraisals in relation to contended schemes. Site level affordable housing targets have been included alongside the borough wide numerical affordable housing target, to provide transparency and clarity on the council's requirements.</p>	No change proposed	Yes

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Indigo Planning on behalf of Wisepress Ltd (continued)		(continued from above) With respect to the prevailing economic conditions, the policy should acknowledge that financial assessments will play an important role in assessing the housing mix and tenure that can be achieved. Such an approach would provide the Council with a 'sliding scale' in terms of the viability of developments and will help to pump prime housing development. The Core Strategy should be amended to promote a flexible approach in terms of allocating housing tenure and mix, to allow for inevitable changes in the market. We are concerned that if Policy CS8 is not amended to provide for more flexibility, it will potentially render new residential development undeliverable			
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Workspace Group	CS8 Housing Choice	<p>We support the Council's objective to encourage housing in sustainable brownfield locations (in order to deliver 4,800 new homes between 2011-2026). However, as per the objectives of emerging London Plan (October 2009) Policy 3.3, we recommend that the following is also added to the objective list: the provision of residential accommodation through mixed-use redevelopment, especially of surplus commercial capacity.</p>	<p>The suggested inclusion is considered unnecessary. Paragraph 18.2 encourages housing in sustainable brownfield locations. Mixed use development within town centres and prioritising the development and efficient use of previously developed land are two stated examples of how additional housing will potentially be sourced. The evidence base supporting Merton's core strategy has not identified "surplus commercial capacity". All development proposals will be considered on a site by site basis and on its individual merits.</p>	No change proposed	Yes

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Mrs Jane Barnes, Residents Association of West Wimbledon	CS9 Housing Provision	<p>It is not sound because there is no evidence to support the statement that 500-600 houses can be delivered in Raynes Park during the plan period without damage to the environment and character of the area. There are few remaining vacant sites or buildings where redevelopment for new housing can take place without change of use and loss of open or employment land (Policies CS13 and CS12). Increasing density on existing sites conflicts with Policy CS13 especially items c, e, and f. The objective conflicts with policy CS 16 paras 24.7 and 24.8 since significant areas of Raynes Park lie within or adjacent to the Flood Plain. Intensification of development adjacent to the flood plain could increase the risk of flooding.</p>	<p>The housing capacity ranges set out for the sub-areas are indicative and serve to providing a guide to how the identified housing capacity is likely to be distributed across the borough. Robust evidence at regional and local level, including the Mayor of London's Strategic Housing Land Availability Assessment (SHLAA) informed the additional housing capacity envisaged for Merton over the LDF Plan period. The SHLAA took account of deliverability issues and development plan policy constraints such as protection of existing character and quality in identifying housing capacity.</p>	No change proposed	Yes

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REPRES TOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUES TED TO ATTEND EXAMIN ATION?
PCT Andrew Grimes	CS11- Infrastructure	11(d) requires amending to " as prioritised by SMPCT and successor commissioners."	Agreed	Will be reworded here YES and in Chap 21, Policy 13, Chap 27 Table 27.1	
PCT Andrew Grimes	CS11- Infrastructure	The Strategy need to state that other policies of the plan can protect health and promote healthier lifestyles and list them (to reflect SO5)	Agreed	Proposed change to CS11 justification that all policies in the CS play a part in protecting health and promoting healthier lifestyles but in particular this is demonstrated in Policy 8-10, 13, 14, 15, 16, 17 and 18-20.	YES
PCT Andrew Grimes	CS11- Infrastructure	There should be a policy commitment to undertake HIA's for major development in the subsequent development management document (to reflect London Plan policy)	Under consideration	Under consideration	YES
Cgms	CS11- Infrastructure	Supporting provision of emergency services as promoted by the Metropolitan. Police's Asset Management Plan,	Agreed	Proposed addition to policy	No

Cgms	CS11- Infrastructure	it is requested that reference to Safer Neighbourhood Bases is removed and replaced with the more up to date wording: 'community policing facilities'. This will ensure that community policing efforts will continue to be supported by the Core Strategy.	Agreed	Amend text to " <i>community policing facilities</i> "	No
Thames Water	CS11- Infrastructure	Thames Water support the reference to the fact that flooding could occur away from the flood plain such as flooding from sewers and that infrastructure will hence need to be in place ahead of development. however stress the point that forward planning is essential and should be included in text.	Agreed	Addition to justification to emphasise need for forward planning regarding water infrastructure planning	NO
Thames Water	CS11- Infrastructure	Thames Water welcome the new section on water and sewerage at paragraphs 19.24 to 19.25, but consider that reference is also required in the Policy.	Under consideration	Under consideration	No

Newridge Trading	CS11- Infrastructure	Newridge Trading considers that additional text should be added to criterion (a) to confirm that any contributions sought must meet with the statutory tests within the CIL Regulations, i.e. they should be: Necessary to make the development acceptable in planning terms; Directly related to the development; and Fairly and reasonably related in scale and kind to the development.	Statutory legislation on planning obligations may change over the lifetime of the plan; the current government have stated proposals to review CIL. Para 19.3 refers to national legislation; during the lifetime of the Core Strategy planning obligations will be decided against the most recent legislative criteria.	No change proposed	No
Crest Nicholson	CS11- Infrastructure, para 19.8	The provision of healthcare often changes. It is therefore suggested that the paragraph is amended to allow potential changes to the way in which healthcare is currently provided.	Under consideration as part of Statement of Common Ground with PCT	Under consideration	YES
Patricia Anderson	CS11- Infrastructure	In general support of additional school provision on open space if locally justified. Questioning soundness with regard to using open space. Currently no suggestion to remove this from the open space policy.	Retain policy wording under open space CS13	No change proposed	NO

Workspace Group	CS11- Infrastructure	Feels that there is little detail on establishing renewable and low carbon energy serving and requesting work with developers to identify suitable sites for renewables.	Principles are set in Policy CS.15, as well as in the London Plan Statutory legislation on planning obligations may change over the lifetime of the plan; the current government have stated proposals to review CIL. Para 19.3 refers to national legislation; during the lifetime of the Core Strategy planning obligations will be decided against the most recent legislative criteria.	No change proposed	YES
CB Richard Ellis on behalf of Newridge Trading	CS11- Infrastructure	Policy CS11 states at criterion (a) that the Council will expect new development to provide for any necessary infrastructure, on-site or as part of a planning contribution. Newridge Trading considers that additional text should be added to criterion (a) to confirm that any contributions sought must accord with the statutory tests within the CIL Regulations, i.e. they should be: Necessary to make the development acceptable in planning terms; Directly related to the development; and Fairly and reasonably related in scale and kind to the development.	London Plan Statutory legislation on planning obligations may change over the lifetime of the plan; the current government have stated proposals to review CIL. Para 19.3 refers to national legislation; during the lifetime of the Core Strategy planning obligations will be decided against the most recent legislative criteria.	No change proposed	No

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
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Andrew Grimes for PCT	CS12 para 20.16	Strategic Objective 4 needs to recognise the health benefits of employment and issues related to unemployment. Comment Par 20.16: National health policies and economic factors may have significant effects on NHS employment for residents of Merton.		
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Metropolitan Police Service Authority	ID:474424 (Comment ID: 101)	Policy CS 12 Economic Development Section 11 of this policy aims to protect and improve scattered employment sites for businesses or community uses. This policy is welcomed as the use of surplus employment and industrial sites for community facilities, such as policing, is in line with London Plan Policy and will assist the Metropolitan Police in achieving its Estate aims.		No changes proposed.
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
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Parham Development Ltd (ID: 473940)	Para 1,4 and 7 of Policy CS12	Don't support DPD as they feel it is not 'sound'; effective and consistent with national policy.	It is intended for Merton's Economic Development Strategy [EDS] (2010) and Merton's Core Strategy to be similar when pinpointing the areas of growth for employment uses for Merton and the types of employment listed in criterion a of Policy CS12 are these.	Update criterion A
Comment ID: 91		<p>Criterion a. in seeking to list economic development jobs, particularly in the commercial and business sectors is not flexible (effective or consistent with national policy as detailed in PPS4 (2009)). PPS4 sets out planning policies for economic development (para.1) with economic development taken to include development within the B use classes, public and community uses and main town centre uses (para.4).</p>	<p>There is a link between the justification to this economic development chapter to the centres chapter in the sub- areas (which refers to PPS4), we could consider including entertainment, arts, and tourism in criterion A of Policy CS12 specifically or in the justification to Policy CS12 refer to the definition of employment as defined in PPS4: Planning for Sustainable Economic Growth (2009).</p>	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
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Parham Development Ltd (ID: 473940)	Comment ID: 91 (continued)	<p>(continued from above)Town centre uses are then defined as including retail development, leisure, entertainment facilities, offices, and arts, culture and tourism development (para.7) At present criterion a. of policy CS12 fails to acknowledge entertainment, arts, tourism development as economic development land uses. Details of the changes required necessary to make CS12 sound: The land uses listed under criterion a, should be brought in line with PPS4 so that the policy states "... Particularly in the commercial and business sectors (including the provision of Class B business jobs, retail, leisure, entertainment, arts, tourism, and 'green jobs'</p>		
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Workspace Group (ID: 473954)	CS12	<p>Don't support the DPD as they feel the document is not 'sound'; effective and consistent with national policy.</p>	<p>Policy CS 12 plans for all types of employment, including small and medium enterprise (SME) sector within Merton. With reference to including waste in the definition of suitable uses on employment sites, Policy CS 17 deals with Waste Management and Merton is currently working with the neighbouring boroughs of Croydon, Kingston upon Thames and Sutton in preparing the South London Waste Plan (intended to cover the period up to 2021 following adoption in 2011).The Waste Plan will set out sites and policies across the four boroughs that are specifically suitable and deliverable for waste management purposes.</p>	No changes proposed	Yes
Comment ID: 77		<p>It is recommended that Policy CS 12 incorporates the following additional criteria: - to manage and improve industrial; land to meet the needs of small and medium enterprises (SMEs), start-ups and businesses requiring more affordable workspace; to ensure the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for both larger and small and medium sized enterprises. – to promote the regeneration of the existing employment sites to improve the quality and range of jobs within the Borough.</p>			

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Workspace Group
(ID: 473954)

(continued from above)Policy CS12 therefore needs to be applied flexibly to enable the maximum amount of employment floorspace to be provided, but having regard to overall viability. We therefore recommend that the following paragraph be inserted within the policy. 2In certain circumstances the Council will support the introduction of a mix of uses as part of the regeneration proposals within SIL and LSIL, where it can be show the such development is necessary to secure wider improvements to the employment function of that area and there is no net loss of employment floorspace”.

Comment ID: 7
(continued)

Whilst we aware that Merton is working with its neighbouring Boroughs to provide the South London Waste Plan (SLWP) which will identify specific waste sites, given the targets set down by the Mayor and the likely time it will take to produce and adopt the SLWP, it is recommended that Policy CS 12 identify SIL and LSILs as suitable for ‘waste management facilities’ (including energy from waste facilities)

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Costco Wholesale	UK Ltd (RPS)	(ID: 471117)	Comment ID: 19	
		<p>These representations support Policy CS 12 – Economic Development which supports the development of a diverse local economic base by encouraging the increased provision of the overall number and range of jobs in Merton. Part C (ii) states that the Council will seek to protect and manage the designated SIL and maintain and improve LSILS.</p> <p>The London Plan Industrial Capacity SPG, adopted 2008, recognises at paragraph 1.0 that potential users may include uses classes other than B1 (b), B1 (c), B2 and B8, such as sui generis uses.</p> <p>For clarity, the Core Strategy should include a definition of uses suitable for employment and industrial land: “Appropriate development on employment and industrial land comprises all business falling within use Classes B1, B2, B8 and closely related uses not falling within a use classes, sui generis uses, (such as cash and carry businesses and builders merchants) but which are commonly found in industrial estates.</p>	<p>Paragraph 4.3 (i) of the Industrial Land Capacity SPD (2008) which supplements the London Plan (2008 – as consolidated with changes since 2004) makes clear that although Preferred Industrial Locations (a category of Strategic Industrial Location) may be appropriate for other uses of an industrial nature, including some of those classified as sui generis such as car breaking, metal recycling, aggregate processing, iron and steel fabrication. However, this cannot be taken as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits”. Therefore, in line with national and regional policy and guidance, any proposals on designated employment sites for suis uses will be dealt with on their own merits and on a individual case bases.</p>	<p>No changes proposed</p>

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
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<p>Wisepress Ltd (Indigo Planning) (ID: 470605)</p>		<p>General support for DPD. With regards to Policy CS12, we are encourage by and support the Council's acknowledgement that there will be some housing gain on employment and were sites are no longer suitable for employment use and this will be considered on a site-by-site basis. In particular, the document sets out that in these cases, permission may be granted for redevelopment. This is a positive approach but gives little comfort to applicants as to specific criteria that will be taken into consideration in the Council's assessment of such issues. While we understand that details of the assessment of site proposals will be assessed in supplementary guidance, we believe they should be clearly identifies within the policy so as to ensure a transparent and consistent approach which gives more comfort to applicants that they are addressing the relevant issues. Dealing with such criteria only in supplementary guidance offers applicants little comfort that the Council will not try and apply other requirements in an arbitrary manner.</p>	<p>To reaffirm, that the justification to the policy only allows for non-designated employment and community sites (for instance scattered sites), that are no longer in use for employment or community purposes and located in areas not appropriate for such uses, may be granted permission for redevelopment to other uses.</p>	<p>No changes proposed</p>
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
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Workspace Group (ID: 473954)	Para 20.15	<p>We note that paragraph 20.15 provides support for the markets specialisation of business and industrial functions within the SIL and LSILs. However the paragraph only makes reference to uses falling within Class B1 (b), (c), B2, B8 – omitting Class B1a (offices). However, in our view, it is vital that Policy CS 12 (and accompanying paragraphs) support the full range of Class B uses within the designated industrial locations (including B1a) – particular where a site is catering for SMEs (which often require flexibility of use – and will, by their very nature, tend to operate under the full range of Class B1 use).</p>	<p>In line with PPS4, Merton's Core Strategy supports town centre type uses that normally generate a high number of trips, such as offices, for location in town centres. Industrial and warehousing uses generally have greater impacts on their neighbours than town centre type uses and are therefore restricted to industrial areas. Permitting non ancillary office development in industrial areas could impact on the viability of town centres and may create neighbour problems when sited next to industry.</p>	No change proposed
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Comment ID: 79

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Safestore Dairy CrestWimb Builders (ID:473924)	CS12	<p>Do not support the DPD; justified, effective or consistent with national policy.</p> <p>Unjustified – not founded on robust evidence base in the form of a detailed qualitative assessment (in particular) of proposed designations for LSIS. Ineffective – the policy is inflexibility and will likely lead to the subject site remaining unviable and redundant with little possibility of future sustainable and viable reuse without removal of its designation to allow for consideration of appropriate potential uses. In consistent with national policy – its fails to have true regard to PPS4 and the need for policies to be flexible and reflective of a need for market responsiveness.</p> <p>The challenge to the soundness of the policy in this regard challenges a historic allocation which it is considered has been carried forward with due justification. The opportunity to present a robust case to the Inspector would be welcomed.</p>	<p>The purpose of Figure 20.1: Economic Development in Merton was to illustrate employment areas (as designated in Merton’s adopted UDP and Proposals map) as Strategic Industrial Locations and Locally Significant Industrial Areas. Merton is designated in the adopted London Plan (2008 –as consolidated with changes since 2004), Industrial Capacity SPD (2008) and draft London Plan (2009); as a restricted borough for the transfer of industrial land into other uses.</p>	No changes proposed	
Comment ID: 63					

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Safestore Dairy
 CrestWimb
 Builders
 (ID:473924)

Comment ID: 63
 (continued)

(council officers response continued)
 Merton's Economic and Employment Land Study update [ELS] (2010) which supports the general protection of employment sites for continued employment uses, in particular, Locally Significant Industrial Areas and Strategic Industrial Locations. As part of the study ELS completed site assessment work on 150 individual sites (including the 16 designated sites and the site at Gap Road Industrial Estate) out of circa 450 employment sites located throughout the borough; only 4 scattered employment sites were identified as unoccupied and unsuitable for employment uses (accounted for 0.32 ha of land) in the longer term.

Overall, there is up-to-date regional and local evidence showing that Merton's employment land is well occupied, has low vacancies, has high rents and as such should be retained for continued employment land use.

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Safestore Dairy CrestWimb Builders (ID:473924)			<p>(council office response continued) The site at the Gap Road Industrial Estate did identify the site as 'average quality' however recommended the potential uses of the site for continued B1, B2 and B8 uses and scored on one aspect only below average due to capability of adjoining uses as the site is mostly located within a low rise residential area. The site scored well with other aspects of the independent site assessment work including strategic access, local accessibility, proximity to urban areas and access to labour & services, development environmental constraints and take also into consideration market attractiveness, planning factors, barriers to delivery, potential uses, timescale/availability and contribution to Economic Strategy (2010).</p>	
Comment ID: 63 (continued)				

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Andrew Pinchin	21 Open Space, Nature Conservation Policy 13 - Delivery and monitoring page 138	Paragraph 5 should be amended to read: 'Protection of front and back gardens will be maintained through the development control process' - not just Protection of back gardens as written. Reason: The DPD should include protection of front gardens in order to promote the aims of a green borough.	point (e) specifically relates to back gardens protection and front gardens are dealt with under the GPDO (see point below). The response refers to wording in Delivery and monitoring and the word front can be included here.	Insert word "front" in para 5 of delivery and monitoring section. Also refer to the GPDO Guidance on the permeable surfacing of front gardens (May 2009) in para 21.5	
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Andrew Pinchin	cs13 (g)	The DPD is sound as far as it goes but I would suggest the following additions to paragraph 9 Nature Conservation: a. Require the planting of at least one new tree in both the front and rear garden of any new development or conversion project undertaken in the borough, unless inappropriate. (Reason: new developments in the borough, particularly where old houses are demolished and replaced by new ones, are frequently not required to replace lost trees and landscaping, with a consequent diminution of quality in the built environment)	Landscaping and tree planting are conditions/obligations determined on a site by site basis..	No change proposed	
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
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Andrew Pinchin	21 Open Space, Nature Conservation - Policy 13 para g	<p>b. Stop the loss of front gardens to car parking and where this has already taken place, require at least 25% of the front garden area to be soft landscaped - ie to prevent boundary to boundary hard area.</p> <p>Reason: To raise the standard of Nature Conservation and promote the objectives of a green borough.</p>	<p>In 2009 the Government introduced changes to the General Permitted Development Order, making the hard surfacing of more than five square metres of domestic front gardens permitted development only where the surface in question is rendered permeable. Use of traditional materials, such as impermeable concrete, where there was no facility in place to ensure permeability,</p>	No change proposed	
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
A Pinchin	CS13 - Open Space	<p>d. Park maintenance – not a planning issue but certainly a quality of life issue. The standard of maintenance in the borough's parks has steadily declined over the past 20 years, and in many places they are now sadly neglected and full of weeds and brambles. Merton should revert to having a single gardener / park keeper who is responsible for each park. This would probably cost no more than the current system of a 'roving team' of gardeners, but would have the advantage of someone being accountable and taking pride in an individual park, and being present to keep an eye on it. Well kept parks and open spaces are an important advertisement for a high performing borough, and high maintenance standards should become a top priority for Merton.</p>	<p>Detailed management of council owned open space is dealt with through other corporate strategies; it is not necessary for a planning framework..</p>	No change proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
A Pinchin	CS13 - Open Space	<p>A. Merton should adopt a policy of immediately replacing a tree where an old or dead tree is removed – see photograph of felled tree in Cannizaro Park not replaced. Trees are a vital investment for the future, and priority should be given to planting more across the borough.</p> <p>B. Where new trees are planted, they should be looked after and not allowed to remain bent or damaged where they may have been pushed over. Straps on posts needed to support new trees should be adjusted on a regular basis.</p> <p>C. Where new trees are planted, the spacing they will require as they grow should be considered – they are an investment by the Borough that should not be wasted due to imprudent planting.</p>	<p>Policy CS.13 statse protection of street trees and safegaurding significant trees</p>	No change proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
A Pinchin	CS13 - Open Space	<p>d. Park maintenance – not a planning issue but certainly a quality of life issue. The standard of maintenance in the borough's parks has steadily declined over the past 20 years, and in many places they are now sadly neglected and full of weeds and brambles. Merton should revert to having a single gardener / park keeper who is responsible for each park. This would probably cost no more than the current system of a 'roving team' of gardeners, but would have the advantage of someone being accountable and taking pride in an individual park, and being present to keep an eye on it. Well kept parks and open spaces are an important advertisement for a high performing borough, and high maintenance standards should become a top priority for Merton.</p>	<p>Detailed management of council owned open space is dealt with through other corporate strategies; it is not necessary for a planning framework..</p>	No change proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Zbigniew Blonski	CS13 Policy	Considered unsound because it does not set out its approach to dealing with proposals for sports facilities/sports stadiums. Various points raised are dealt with below. Policy CS 13(a) does not set out or refer to what appropriate uses of MOL are, and what if any development would be appropriate and in what circumstances. For example Raynes Park Vale football club stadium is situated on MOL. There is no clear guidance as to how or whether modernising and improving facilities including through redevelopment would be acceptable.	it does supporting proposals for sporting facilities is set out in CS.15 (h) (I)	No changes proposed	
Zbigniew Blonski	CS13 (a)		MOL is managed under national and regional policy. The MOL policy NE.1 in the UDP will remain until a DC DPD is to be prepared following adoption of the CS.	No changes proposed	
Zbigniew Blonski	CS13 - (h) (I)	Other part of the policy - CS 13(h)(i) and (ii) could be construed as supporting such a proposal but there is no clarity or certainty in this respect and not in line with national policy.	London Plan policy states that a sequential approach should be taken to assessing the need and capacity for additional leisure and cultural facilities (policy 3D.2 and 3D.4 and 3D.8).	No changes proposed	Not specified

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Zbigniew Blonski	CS 13 (h) (I)	<p>Policy CS 13(h)(i) should be modified to state: Safeguarding the existing viable cultural, leisure, recreational and sporting facilities and supporting proposals for new and improved facilities including the development of a new football stadium and sports facilities at the Greyhound Stadium, Plough Lane, supported through necessary enabling development as appropriate. In special circumstances where appropriate consider the acceptability of such development on open space.</p>	<p>The Core Strategy supports sporting facilities but does not prioritise any particular club. Site proposals deal with specific allocation of sites.</p>	<p>No changes proposed</p>	<p>Not specified</p>

REPRESENTOR POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
Zbigniew Blonski	<p>CS13 - (I) section I education should be modified in the following way to apply to education and other appropriate uses:</p> <p>Planning permission will only be considered for development that results in the loss of open space to provide educational establishments and exceptionally for a football stadium where it can be justified that:</p> <ul style="list-style-type: none"> - There is a need and that the need cannot be met nor is appropriate to be met elsewhere in the borough or in London; - That provision is not viable or achievable on any other site, as demonstrated by applying the sequential test to site selection or other appropriate form of assessment; - That any development would not adversely unacceptably affect the nature conservation values of the site and could not be adequately mitigated; - That, as appropriate, cessation of educational provision on the site 	<p>Proposal for a football stadium is not appropriate in education section of the policy. This exception from general protection of open space is to meet the imminent need to expand and secure sites for additional school places. Some of the wording on this section may be altered, particularly with regard to the Free Schools recent govt proposals.</p>	<p>Wording is under consideration but general principle will remain for school provision only.</p>	<p>Not specified</p>

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
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Andrew Grimes	CS13 - Open Space	!1(d) requires amending to " as prioritised by SMPCT and successor commissioners."	Will be reworded here and in Chap 21, Policy 13, Chap 27 Table 27.1	Reword to " <i>and successor commissioners</i> "	
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Andrew Grimes	CS13 - Open Space	CS 13 should state that the Council will provide the opportunity to improve health and well-being by providing access to open space, nature conservation, leisure and culture. The policy does not refer to deficiencies in open space provision.	Under consideration	Under consideration	
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Andrew Grimes	CS13 (h)	CS 13 (h) should include "and to encourage exercise in daily routine such as when travelling to work or school?"	Will be included	Include " <i>and to encourage exercise in daily routine such as when travelling to work or school</i> "	NO
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Carmelle Bell for Thames Water	CS13 - Open Space	Thames Water consider that the Thames Water Pumping Station site at Byegrove Road, Colliers Wood (as shown on the enclosed plan) , should be identified as an existing Major Developed Site (MDS) in the MOL in accordance with PPG2.	Under consideration	Under consideration	
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
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Susan Sheahan for Env Agency	CS13 - Open Space	In terms of conservation and biodiversity we find the Core Strategy to be very thorough and the document to be consistent with national policy.	Bullet point g. (vi) refers to leisure and recreation use of Merton's waterways.	No change proposed	
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More generally the potential for the Wandle, Cannon Hill Common and Wimbledon Park as recreational hotspots for fishing has been missed and also potentially Mitcham common waters. There is also missed potential for tourism on the river Wandle which could attract national and international fishing participants.

Planning Perspectives on behalf of Powerleague	CS13 - Open Space	We propose the addition of wording to the policy at CS13 (h) to state at point (i) that where cultural, leisure, recreational and sporting facilities are unviable, alternative uses will be considered on their own merits, provided that there is an overall benefit to the community.	Reflected in PPG.17, consideration if repetition is beneficial to improve clarity	H. could be rewritten as <i>"Based on assessment of need and capacity, opportunities in culture, sport....."</i>	
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Jane Barnes for RA of West Wimbledon	CS 13 (i)	It is not justified because it is not the most appropriate plan, in that it accepts (item i.) that open space may, in some circumstances, be lost to development for educational establishments. There should not be an exception for educational establishments.	Merton has made the decision to include the provision of school provision on some open space and the CS is currently to be submitted with this inclusion. The loss of open space to educational establishment will need to be justified on the basis of the needs identified in (i)	No change proposed	YES
Iain Simpson for The Wimbledon Society		1 It accepts (items a & i) that Open Space may, in some circumstances, be lost for educational establishments. This is counter to the Strategic Objectives 3a (local character), and Objective 6 (enhancing green space and the natural environment). There should be an absolute bar on any such development of Open Spaces.	Merton has made the decision to include the provision of school provision on some open space and the CS is currently to be submitted with this inclusion. The loss of open space to educational establishment will need to be justified on the basis of the needs identified in (i)	No change proposed	YES
		Suggested wording: 21.1a Add: "Protect and enhance All the Borough's public and private open space network " 1.1 I Remove this entry (on Educational land) in its entirety.			

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATI
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Iain Simpson
for The
Wimbledon
Society

2 The statement on the preservation of green space (item C) is inadequate. There should be a clear policy that requires a minimum percentage of any development site (the percentage varying according to the density of development) to be kept unbuilt for nature and/or food production. Suggested wording 21.1 c Add: " wider network of open spaces. The percentage of unbuilt land that should be retained in various localities, for nature and/or food production, will be dependent on the local environmental character".

No change proposed

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Iain Simpson for The Wimbledon Society	CS13 (g) (v)	3 It does not include provisions relating to replacement, where permission is granted for the removal of protected trees. Such replacement should be expressed in terms of "tree years", where the combined age of the removed trees is replaced by young trees of a similar combined age, plus a percentage. Suggested wording 21.1 g5: Add: "Protect street trees and use Tree Preservation Orders to safeguard significant trees. <i>Require that when trees are removed, replacement trees are provided that exceed the combined age of the lost trees</i> ".	Currently there is no provision to fund or enforce this proposal	No change proposed	YES

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Peter Fischer	CS (i)	<p>Unsound: Due to inconsistency between items a and i. Building educational establishments on open space is incompatible with undertaking to protect and enhance the borough's public and private open space.</p> <p>If one of the London Plan's six objectives is to accommodate London's growth within its boundaries without encroaching on open space then all open space in the borough must be inviolate and development should not be allowed on any open space but in particular not on any public open space.</p>	<p>Objective 1 of the London Plan does state to accommodate growth within London's boundaries without encroaching on open space. The emerging Plan sets 6 different objectives which encourages meeting challenges such as population growth (obj 1) and a city that makes the most of and extends its open and green spaces (obj 5). The policy generally conforms with the need to encourage good use of open space, while realising it's potential for improving Londoners' health, welfare and development.</p>	No change proposed	NO

The wording of the policy should be amended by omitting item i in its entirety.

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Wimbledon Society	CS14 Design	The list of issues required to achieve high quality design (item b) is inadequate. It should be extended to cover such issues as protection of neighbouring properties' daylighting and privacy; and recognition of street scale, building lines, gaps between buildings. Suggested changes 22.1 b8 Add: "Respects the daylighting, privacy and energy generation capacity of nearby lands and buildings	The extensive list of specific design considerations in development is recognised through CS.14, including paragraphs 22.9, 22.24.	No changes proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMIN
Wimbledon Society	CS14 Design	<p>2) The policy on tall buildings (item c) is misconceived and inadequate. There should be clear rules on maximum heights in each Town Centre. Leaving the issues to be settled on the basis of someone's judgment of architectural quality or regeneration benefits is a recipe for constant attempts to introduce taller and taller buildings. Suggested changes 22.1 c Omit the text and instead substitute:</p> <p>"Protecting the valued and distinctive suburban character of the Borough by limiting the height and scale of new development. This will range from 2 storeys (measured to the eaves / gutter line) in much of Wimbledon and Baynes Park, to three storeys along some busy roads, and a maximum of 6 storeys on Wimbledon town centre.</p>	<p>Specific building heights are not imposed in a strategic policy as it could compromise design principles. This element of the policy has been developed in conjunction with English Heritage, and involves extensive research as set out in the tall buildings background paper. It made clear that in areas suitable for tall buildings existing tall buildings are the 'pinnacle' of tall building development in those areas.</p>	<p>No changes proposed</p>	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMIN
<p>CB Richard Ellis on behalf of Newridge Trading</p>	<p>CS14 Design</p>	<p>Policy CS14 states that all development needs to be designed in order to respect, reinforce and enhance the local character of the area in which it is located and to contribute to Merton's sense of place and identity. It is considered that whilst developments should respect their environs, this should not preclude landmark buildings and innovative design solutions from coming forward in appropriate locations.</p>	<p>The policy is justified by policies requiring a plan-led approach to locations for tall and large buildings and conservation of heritage assets and their settings. The Council's evidence-based approach includes the Tall Building background paper, English Heritage guidance and support, and the Design SPG and revision. Landmark buildings/ innovative design are not necessarily tall buildings. A certain degree of flexibility is embedded in the policy from terms such as 'unlikely' and 'may'.</p>	<p>No changes proposed</p>	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMIN
<p>CB Richard Ellis on behalf of Newridge Trading</p>	<p>CS14 Design</p>	<p>Furthermore, criterion (c) of Policy CS14 sets out where the Council considers it may be appropriate to site tall buildings. Criterion (c) ends by stating that "outside of these locations tall buildings are unlikely to be appropriate". It is considered that, in order to provide sufficient flexibility, additional text should be added here to confirm that regard will be had to site-specific circumstances when considering the appropriateness of locations for tall buildings.</p>	<p>While there is a debate around identification of specific locations for tall buildings consideration on a case-by-case basis (as part of the replacement London Plan EiP), national policy and guidance tends towards properly planned development (the right development in the right places - PPS1). While the Core Strategy is supported by evidence which identifies appropriate, sensitive and inappropriate locations for tall buildings it is felt that the word 'unlikely' allows room for developers to provide sound justification as to the why the proposal should be considered acceptable and how any impacts have been mitigated.</p>		

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
CB Richard Ellis on behalf of Newridge Trading	Paragraph 22.14	Paragraph 22.14 states, amongst other things, that "beyond heritage assets, unnecessary demolition of Merton's existing building stock will also be discouraged." Newridge Trading consider that it would be beneficial to include the Council's definition of "unnecessary" here, and is of the view that where buildings are proposed to be demolished to make way for the redevelopment of a site, this should not be deemed as "unnecessary".	Agree clarification might be helpful. Suggest "opportunities for refurbishment rather than demolition and replacement will be encouraged as a more sustainable option".	Replace "unnecessary demolition of Merton's existing building stock will also be discouraged" with "opportunities for refurbishment rather than demolition and replacement will be encouraged as a more sustainable option"	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Andrew Pinchin	22 Design - Policy 14 - Delivery and Monitoring page 151	The DPD is not sound as it separates the approach to highway upgrades, street furnishings, signage, advertising etc from the planning process. A programme for assessment of the quality and success of highway design, street furniture and signage should be undertaken in all areas of the Borough. A programme to bring all areas up to an agreed consistent high design standard that responds positively to Character Assessments in the Boroughs 28 CA should be formulated and implemented. These matters should be subject to (and positively respond to) public consultation and to agreed planning policy, so that they meet agreed consistent design standards. Reason: To improve design standards in the borough and ensure a consistent standard and accountability.	The Core Strategy is the strategic plan for the borough, and is one of a 'suite' of LDF documents. While the Core Strategy provides the overarching vision and objectives for each policy area, it will be for other plans to set out the detailed guidance. In the case of public realm design, the following documents supplement the Core Strategy: The Council's Street Scene Design Guide (2008) includes public realm principles, detailed design principles, and maintenance and management responsibilities. This includes guidance for highways as well as the pedestrian realm. Inevitably there is a finite amount of funding and resources for public realm improvements, and the Council prioritises schemes through... It should be noted that the above guide will be used as a reference for the Council and its partners in future schemes and it is not the Council's intention to replace street scene elements before the end of their useful life unless part of a wider improvement programme or decluttering exercise. ?	Suggest adding a similar sentence to para 22.31 (taken from the Council's Street Scene Design Guide) as follows: "The vision is to design a public realm that through simple uncluttered design allows the local identities of each borough centre to be expressed." Also add reference to Street Scene Design Guide (2008) in Key Drivers box.	

REPRES TOR	POLIC Y	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUES TED TO ATTEND EXAMIN
Andrew Pinchin	22 Design - Policy 14 The Public Realm para 22.31 page 149	The DPD is sound as far as it goes but should include further requirements for improving design standards in the built environment. Paragraph 22.31 should include a positive policy of: 'Improvement of the built environment through removal of unnecessary street clutter and signage, minimising of road markings and reduction of visually intrusive and damaging traffic control measures such as road humps and chicanes'. Reason: To promote better urban design in the borough. Please see recommendations contained in attached letter dated 10th October 2009 which include the adoption of narrow yellow lines, single low level road signage, removal of redundant road signs and banning of 'sky' advertising signs as seen at Shannon Corner - see attached photograph.	Paragraph 22.31 could include a reference to de-cluttering and it is currently a hot topic for the government. The government will complete its research into street furniture in spring 2011, publishing advice for councils later that year. Government has written to council leaders calling on them to reduce the number of signs and other "street clutter". The Council's Street Scene Design Guide (2008) will be used as a reference for the Council and its partners in future schemes, and includes a strong commitment to de-cluttering. Public Realm Strategy?	Suggest adding a sentence to para 22.31 (taken from the Council's Street Scene Design Guide) as follows: "The vision is to design a public realm that through simple uncluttered design allows the local identities of each borough centre to be expressed." Also add reference to Street Scene Design Guide (2008) in Key Drivers box.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMIN
Andrew Pinchin	22 Design - Policy 14 para 22.29 page 149	The DPD is not sound because the detrimental effect of the loss of front gardens and vegetation to parking is not restricted to where single dwellings are converted into two or more smaller units. It is a problem throughout the borough where front gardens are lost to parking. I suggest that the principle of retaining front gardens should be included as an over-arching requirement under Policy 13 Open Space and Nature Conservation and / or under Policy 14 High Quality Urban Design, and should be enforced by the development control process. Reason: to improve the built environment and promote a greener borough.	The loss of front gardens of dwellings to parking is a permitted development right. There are regulations attached to this right, such as a limit to the surface area which can be hard-standing, and drainage standards such as permeable materials. Councils have the ability to restrict this right in conservation areas, however this is a development issue and is more appropriate dealt with in the Development Management document rather than the Core Strategy.	No change proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
Andrew Pinchin	CS14 Design	<p>The DPD is not sound as it is not justified. Minimum space standards impose unreasonable and impracticable restrictions on private development and are contrary to free market conditions. The requirement should apply to social housing only. The policy should be re-worded to read: 'We will apply housing quality standards including minimum space standards to all social housing in the borough'.</p>	<p>Draft replacement London Plan policy 3.5 and table 3.3 set minimum space standards for all new dwellings. It is therefore not considered unreasonable or impracticable. There are a number of sources for space and quality standards which include CABE Building for Life, Lifetime Homes standards, London Housing Design Guide. The justification for setting minimum space and quality standards in the Core Strategy is contained in paragraph 22.15: New housing in the borough must be of a high quality, providing functional internal and external spaces that are fit for purpose, inclusive and flexible to meet the needs of various household types including small households, families and the ageing population.</p>	No change proposed	

REPRES TOR	POLIC Y	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUES TED TO ATTEND EXAMIN
Andrew Pinchin	22 Design - Policy CS 14 page 140	Paragraph a: The words 'protecting and enhancing' should be changed to 'preserving and enhancing' wherever they are used in the Core Strategy. Reason: the word 'preserve' implies greater protection to the historic environment than simply protecting it, and is in line with the wording of Conservation Area policy which requires any new development within Conservation Areas to preserve or enhance and do no demonstrable harm to the Conservation Area. The word 'preserve' is more appropriate in a borough which has many Conservation Areas.	Agree. English Heritage suggests changing CS14a to 'conserving and enhancing' which has similar implications to 'preserving'.	Change CS14a "protecting and enhancing..." to "conserving and enhancing..."	

REPRES EN TOR	POLIC Y REFER ENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUES TED TO ATTEND EXAMIN
Andrew Pinchin	22 Design - Policy CS 14 page 140	Para d: The contents of this paragraph do not relate specifically to design issues and are not justified in this DPD. Requirements for space standards and units in residential development should be included in Policies 8-10 Housing. (a) The proposal for all residential development to comply with minimum space standards is not justified and inappropriate and should be re-worded to apply only to social housing.	Part d of Policy CS14 is supported and justified by evidence set out in the Dwelling Conversions Background Paper (2010).	Consider cross-referencing opportunities between Housing chapter and residential design policy.	
Andrew Pinchin	22 Design - Policy CS 14 page 140	CS14d: The wording is confusing and implies that all single dwellings should be changed to two or more smaller units. Wording should be changed to: 'Where existing single dwellings are converted into two or more small units of accommodation ..	Under consideration	Under consideration	
English Heritage	22 Design	In general, we consider that the Core Strategy is sound in respect of the historic environment subject to further minor amendments.	Comments welcome	No changes proposed	

REPRES TOR	POLIC Y	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUES TED TO ATTEND EXAMIN
English Heritage	22 Design	English Heritage recommends a more consistent approach using the term 'conserve and enhance heritage assets and the wider historic environment' to conform to PPS5.	Agree.	Use term 'conserve and enhance' in respect of heritage assets throughout the document.	
English Heritage	22 Design	English Heritage agrees with the position and conclusions of the Tall Buildings background paper but would prefer to see Policies CS1-6 clearly stating the tall building policy position within the policy itself.	Under consideration	Under consideration	
English Heritage	22 Design	English Heritage has previously provided comments on Policy CS14 which we consider can be strengthened by making some minor alterations to the wording.	Agree.	Make changes to Policy CS14 as set out in EH response	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION
NHS Sutton & Merton	CS14 b)	Add a bullet to CS14 b) to read: promotes healthy lifestyles, protects the health of new and existing residents and promotes social inclusion. The strategy needs a paragraph before para 22.16 to outline the role of good design to offset negative environmental and health impacts and to create healthier communities in line with the Community Plan theme. HIAs of major developments can help promote good design by addressing health impacts.	Agree – add health and inclusion to design issues. Early suggested textual changes to the replacement London Plan also places greater emphasis on inclusive design (for example, additions to para 7.8). Issues of health relate to the influence of the public realm.	Consider best place to add reference to health and inclusion.	

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REPRES ENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
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CB Richard Ellis on behalf of Newridge Trading	CS.15 Climate change	Newridge Trading recognises the importance of combating climate change, however considers that Policy CS15 as currently drafted does not provide sufficient flexibility for the development industry. Newridge Trading welcomes the recognition within the policy that it is not necessary to demonstrate compliance with the policy criteria if this is not viable, however is of the view that this should equally apply to feasibility considerations.	We consider that by focusing on viability, issues of feasibility are also adequately covered. A particular solution might be feasible but so expensive that it does not become viable. Conversely, additional viability in a scheme might bring forward more feasible solutions to reduce carbon from a proposed development	No changes proposed	
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REPRES ENTOR POLICY REFERENCE SUMMARY OF REPRESENTATION RESPONSE SUGGESTED CHANGES Examination

<p>CB Richard Ellis on behalf of Newridge Trading</p>	<p>CS.15 Climate change</p>	<p>Furthermore, Newridge Trading is of the view that criterion (e) of Policy CS15 is unnecessarily onerous at this time. It is understood from the supporting text to the policy that Level 4 of the Code for Sustainable Homes is not mandatory until 2013, and it is considered that there is insufficient justification included within the Core Strategy to justify requiring compliance with Code Level 4 now. Recognising that the "lifetime" of the Core Strategy must extend over a 15 year period, it is considered that criterion (e) of Policy C515 should be re-drafted to require developers to seek to achieve the appropriate Code Levels when it becomes mandatory to do so.</p>	<p>Evidence, including the study "viability of Code for Sustainable Homes in Merton" (Sept 2010) demonstrates that requiring Code 4 is generally viable across Merton. The first sentence of Policy CS.15 introduces flexibility and reasonableness in allowing developers to demonstrate lack of viability on a site-by-site basis</p>	<p>No changes proposed</p>
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REPRESENTOR REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	EXAMINATION
Wimbledon Society, The CS15	<p>It is unsound because it is not justified, as it is not the most appropriate plan. Item e is inadequate for a Plan with a 15 year timescale_</p> <p>Government policy is that housing should meet Code 6 standard by 2016. By the time the Core Strategy is adopted, Code 5 should be in place, in preparation for Code 6, five years later. Suggested wording: 23.1 e "We will require all new development comprising the creation of new dwellings to achieve Code for sustainable homes level 5, and Code level 6 from 2016".</p>	<p>Agreed that the Core Strategy would benefit from a clearer statement of the intention to introduce higher levels of CSH and BREEAM as time goes on. Even though these are hard to anticipate over a 15 year plan, changes to the requirements placed on developers to meet different levels of sustainable design and construction standard (in advance of national policy) should be included where possible in the core strategy. Set against a back drop of the stepwise improvement to part L of the building regulations and the rapidly changing climate change policy landscape it is clear that the current climate change policies included in the core strategy could be more progressive in nature. It will therefore be necessary to introduce and implement higher levels of sustainable design and construction standard when there is sufficient evidence to demonstrate that such an elevation in standard is viable.</p>	<p>Draft wording: 'As building regulations are tightened as part of the move to zero carbon development Merton will continue to assess the viability of moving ahead higher levels of sustainable design and construction standard such as CSH and BREEAM. Where evidence suggests that higher levels of sustainable design and construction standards are viable, these will be introduced into policy through the publication and of supplementary planning documents. This will ensure that the highest viable level of sustainable design and construction are sought within the borough.</p>	

REPRES ENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
Wimbleton Society, The (continued)					<p>(council officer response continued) "Looking ahead to the implementation of the allowable solutions Merton will expect all onsite emissions reduction to be exhausted before examining any offsite emissions reductions through the allowable solutions" "More specific minimum BREEAM credit requirements may be recommended in relation to other issues (for example flooding or ecology) depending on a developments location and local environmental issues."</p>

REPRES ENTOR POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
Wimbleton Society, change The	<p>It is unsound because it is not effective. There is no policy to reduce the amount of energy imported into the Borough. Suggested changes: 23.1 g "We will aim for a reduction in the amount of energy imported into the borough over the plan period".</p>	<p>Considering the long-term nature of LDF core strategy, it would be prudent to clearly state some of the councils expectation with regards to the development of new buildings with regards to the allowable solutions that will make emissions reductions carried offsite to count towards a developments emissions reductions targets. The allowable solutions are supposed to be included as we move from standards that cover 100% of regulated emissions (excludes emissions from cooking and onsite appliances) to all building emissions. There is however a high possibility that the allowable solutions will be introduced at an earlier stage (CSH level and 100% of regulated emissions) to reduce the burden on developers.</p>	<p>"Looking ahead to the implementation of the allowable solutions Merton will expect all onsite emissions reduction to be exhausted before examining any offsite emissions reductions through the allowable solutions</p>	

REPRES ENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
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Andrew Pinchin	23 Climate Change - Policy 15 - para 23.4 page 153	The DPD is not sound, justified or deliverable. For most large developments it is unrealistic to expect 10% of energy requirements to be produced on site from renewable energy sources. The percentage should be omitted and the policy re-worded to encourage the use of renewable energy, and to require all buildings to incorporate good thermal insulation to reduce thermal loss. Reason: The DPD is not achievable as it stands.	Merton's Core Strategy does not contain a specific target for any types of development regarding the production of on-site renewables.	No changes proposed	
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REPRES ENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	Examination
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Berkeley Homes (Urban Renaissance) Ltd, via Indigo Planning	CS.15 Climate change	<p>From the information publically available, there does not appear to be sufficient evidence to demonstrate the local circumstances, particular to the London Borough of Merton, which justifies the Council's introduction of all aspects of CSH level 4 in advance of the national timetable for achieving energy efficiency savings equivalent to CSH 4. We contend LB Merton's approach is unsound as it clearly conflicts with the advice in PPS: Planning and Climate Change. Indeed, Merton's Affordable Housing Viability Study, which forms part of the Core Strategy evidence base, acknowledges that the cost of building homes to CSH Level 4 is significantly more expensive than to build homes to CSH level 3. The document quotes £50/m2 additional cost for achieving CSH level 3 and £1 00/m2 for achieving CSH level 4. A notional average additional cost assumption of £7,000 per dwelling was settled upon, although it should be recognised, that will vary significantly depending on the size of the dwelling and the circumstances/constraints of the particular development site.</p>	<p>Evidence, including the study "viability of Code for Sustainable Homes in Merton" (Sept 2010) demonstrates that requiring Code 4 is generally viable across Merton. The first sentence of Policy CS.15 introduces flexibility and reasonableness in allowing developers to demonstrate lack of viability on a site-by-site basis. It should be noted that Code 4 is already required for schemes in receipt of funding for affordable homes.</p>	No changes proposed	
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REPRES ENTOR POLICY REFERENCE SUMMARY OF REPRESENTATION RESPONSE SUGGESTED CHANGES Examination

Berkeley Homes (Urban Renaissance ce) Ltd, via Indigo Planning	CS.15 Climate change	The significant uplift in building costs associated with achieving CSH level 4 will have serious implications on the viability of housing schemes and will be likely to threaten housing delivery within the Borough, particularly during this difficult economic climate. The non delivery of housing, will in turn, affect the Borough's capacity to provide its annual monitoring target of 320 homes (40% of which is identified as affordable housing)	Evidence, including the study "viability of Code for Sustainable Homes in Merton" (Sept 2010) demonstrates that requiring Code 4 is generally viable across Merton. The first sentence of Policy CS.15 introduces flexibility and reasonableness in allowing developers to demonstrate lack of viability on a site-by-site basis. It should be noted that Code 4 is already required for schemes in receipt of funding for affordable homes.	No changes proposed
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REPRES POLICY SUMMARY OF REPRESENTATION RESPONSE SUGGESTED CHANGES Examination
ENTOR REFERENCE

<p>Berkeley Homes (Urban Renaissan ce) Ltd, via Indigo Planning</p>	<p>CS.15 Climate change</p>	<p>In order to be consistent with National Planning Policy set out in Planning Policy Statement: Planning and Climate Change (the Supplement to Planning Policy Statement 1), we suggest that LB Merton's Policy CS15 (a) should be re-worded as follows: "All new development comprising new dwellings will need to meet the CSH level that has a mandatory energy/carbon performance equivalent to the energy/carbon performance required under the Building Regulations appertaining at the time the application is determined, taking into account the circumstances of the site and development viability."</p>	<p>Evidence, including the study "viability of Code for Sustainable Homes in Merton" (Sept 2010) demonstrates that requiring Code 4 is generally viable across Merton. The first sentence of Policy CS.15 introduces flexibility and reasonableness in allowing developers to demonstrate lack of viability on a site-by-site basis.</p>	<p>No changes proposed</p>
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND
Wimbeldon Society, The	CS16	It is unsound because it is not effective, because item e is too weak Suggested change: 24.1e "implement measures to mitigate flood risk"	Agree in part. Merton Council would not normally implement such measures directly but would influence others to do so.	(e)" Propose and ensure the implementation of measures to mitigate flood risk..." (to be checked with Environment Agency)	Yes

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REPRESENT OR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society, The	CS17	It is not justified because it is not the most appropriate plan. The justification for this Policy refers (para 25.4) to waste minimisation, but there is no reference to this in the Policy itself. This should be corrected. Suggested changes 25.1d "We will increase household recycling rates(omit phrase).....looking to disposal as the last option...."	Matters regarding waste minimisation and its use as a resource, as expressed in 'The Waste Hierarchy' in Annex C of PPS10, are addressed by the policy's expression of support, in part 'a', of government and regional planning policy and will be addressed in more detail in the South London Waste Plan DPD.	No changes proposed	Yes
Wimbledon Society, The	CS17	The Policy refers (item d) to waste as a resource. Unless this is qualified, there is a danger that it will conflict with the objective of waste minimization. 25.1e "We will promote waste minimization, re-use, recycling and composting, and energy recovery". Suggested changes 25.1e "We will promote waste minimization, re-use, recycling and composting, and energy recovery	Matters regarding waste minimisation and its use as a resource, as expressed in 'The Waste Hierarchy' in Annex C of PPS10, are addressed by the policy's expression of support, in part 'a', of government and regional planning policy and will be addressed in more detail in the South London Waste Plan DPD.	No changes proposed	Yes

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REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
The Highways Agency	Table 28.1 Policy CS20 4th indicator	To include reducing car trips as an indicator / target in Table 28.1	Have rephrased the table to reflect comment	Table 28.1 Policy CS20 4th indicator proposed as 'Percentage of change in traffic generation and modal shift'	
The Highways Agency	Page 166, Policy CS18 part f	Rephrasing policy to provide greater clarity	Agree with rephrasing of part f	Propose to replace Policy 18 part f 'Requiring the submission of travel plans to accompany development proposals which meet or exceed the Department for Transport's indicative thresholds for Transport Assessments or the thresholds in relevant Transport for London guidance'	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
The Highways Agency	Paragraph 26.7	Rephrasing policy to provide greater clarity	Agree with rephrasing	The Department of Transport's (DfT) Walking and Cycling: An Action Plan centres on providing improvements to the environment and facilities for walkers and cyclists with targeted information about travel choices, health benefits and recreational opportunities. It is the government's key plan in promoting active transport. We will require Travel Plans to meet or exceed the indicative DfT's thresholds for transport assessment and Transport for London guidance.'	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Sustrans	Policy CS18 e), and points 26.4 and 26.5	Specific mention of the Greenways network is suggested specifically; Policy CS18 e) and points 26.4 and 26.5. The greenways network within the borough has a number of priority routes: - National Cycle Route 20, the Wandle Trail - Link from Wimbledon Park to Morden Park, via Raynes Park (this route continues to Sutton) Inclusion of the greenways map would also be welcome.	Have added the Greenways network to Policy CS18 e) and the para 26.4 and 26.5	Proposed rephrasing of Policy CS18e 'Partnership working to deliver high quality links or enhancement of existing pedestrian and cycle networks, specifically the Capital Ring, Wandle Trail, Wandle Beverly Brook Link, the Greenways network, the Cycle Superhighway and the London Cycle Network.' Para 26.4 Add The Greenways network at beginning of paragraph. Para 26.5 add a last sentence 'The Greenways network co-ordinated by Sustrans a coordinated city-wide network of good quality walking and cycling routes.'	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Sutton and Merton PCT	Table 28.1 Policy CS20 4th indicator	The monitoring framework for SO7 should also include monitoring of impact on increasing active travel - impact on increasing physical activity as part of everyday activity e.g. walking to work and school.	This has already been commented by the Highways Agency and changed - refer to comment in this table	N/A	
Wimbledon Society	CS18 suggested new part h	Add new part h to read 'Creating new footpath links and improving existing routes where these would provide better access to public facilities, and within local communities'.	Policy CS18 Part a-d adequately encourages improving all pedestrian access throughout the borough. Merton Council is currently developing a Sustainable Transport Strategy and Local Implementation Plan that will set out the council's proposals which will provide the mechanism to prioritise pedestrian and access initiatives to be delivered subject to funding.	No change proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society	CS 19	Suggested new part J: 'Encouraging the creation of a first class public transport interchange at Wimbledon Station' and new part k 'Protect existing bus stations and facilities, and provide better bus priorities and new bus routes to improve accessibility and journey times.'	The Policy CS19 G & I adequately provides the mechanism to encourage both the issue of the station and bus services in the borough and Policy CS6 H refers specifically to Wimbledon. Merton Council is currently developing a Sustainable Transport Strategy and Local Implementation Plan (LIP2) that will include more details on how the Council will continue to work with local and regional partners to deliver public transport improvements.	No change proposed	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Wimbledon Society	CS 20	Suggested wording: Before a, 'Make residential areas and Town Centres more pleasant and safer through measures to reduce traffic speeds'. After b 'Implement selective measures to protect particularly vulnerable areas of housing or open space from traffic noise'.	Policy CS20 a-e adequately addresses this and is supported for each town centre with CS1 d; CS2 e, f & j; CS3 c, d & g; CS4 d, e & h and CS6 g & k. Policy CS18 addresses access and safety throughout the borough. Merton Council is currently developing a Sustainable Transport Strategy and Local Implementation Plan that will set out the council's proposals which will provide the mechanism to prioritise safety and speed pedestrian and access initiatives to be delivered subject to funding.	Policy CS20 part h proposed change from 'Considering permit free..' to 'Supporting permit free...'	
		Amend j at end 'unsafe at night or hours of low usage. The minimum standards should be those set by the Freight Transport Association, but tighter standards will be required where the small scale road system is an important slam not in protecting local character'.	Issue of noise mitigation under consideration (Strategic Objective 5)		
			Policy CS20 part h has been amended from 'Considering permit free..' to 'Supporting permit free...' to identify permit free development as a council preference where appropriate.		
			Policy CS20 parts e, k & o adequately addresses this.		

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Transport for London (via GLA)	Table 27.2	Strategic Requirement 3N. New access road: £6m Road from Carshalton Road onto Willow Lane, Mitcham	As clarified, Merton's priority is the provision of Willow Lane tram stop for S106 funding in the new access area. However, an access road is also desired to fully serve this area.	N/A	
		The text states that the need for the new access road from Carshalton Road onto Willow Lane is to facilitate the regeneration of Willow Lane and that it may be partly funded by Section 106 contributions. TfL is, however, under the impression Merton Council wishes to see a new tram stop at Willow Lane to serve the same purpose. Tramlink has been working towards provision of a new tram stop at Willow Lane on the basis that Section 106 money would be available for this purpose. The Council should clarify whether it still wishes to see a new tram stop at Willow Lane and if that is the case how it intends to fund this if Section 106 contributions are to be used for the new road instead			

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Transport for London (via GLA)	Table 27.2 Strategic Requirement 7F: Bus route improvements including improved provision in Mitcham and Pollards Hill	TfL queries why Network Rail is listed as a potential source of funding for this project. It is appropriately listed under 7G	Network Rail to be removed as source of funding	Remove Network Rail as a source of funding under Strategic Objective 7F.	
Transport for London (via GLA)	Table 27.2 Strategic Requirement 7G: Station improvements at Wimbledon and Raynes Park	TfL is identified as a potential source of funding for station improvements at these stations but at present has not budgeted or planned to provide funding for this scheme. TfL would expect other potential sources of funding including (South West Trains, Department for Transport, Section 106) to be listed here.	This is agreed, other sources of funding to be added.	List South West Trains, Department for Transport, Section 106 funding under Funding Sources.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Transport for London (via GLA)	Table 27.2	Strategic Requirement 7G: Aspiration for Crossrail Line 2 (Chelsea – Hackney line) to serve the borough TfL is listed as a potential source of funding however at present TfL has not budgeted or planned to provide funding for this scheme. Further more it should be noted that the scheme is very long term.	We understand that there is no funding identified for this scheme. However, the scheme is a mayoral and local aspiration. For which funding for feasibility may be available during the lifetime of this strategy.	N/A	

REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
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Andrew Pinchin	26 Transport - Policy CS20 Parking, Servicing and Delivery page 177	Paragraphs d. and g. are duplicated and one of these should be deleted. Paragraph h. Permit free agreements are not justified and are discriminatory to new developments. Where CPZs are in place, all residents in the area should have the right to parking permits, without excluding occupiers of new developments. Residents of new developments are already penalised by having made (via the developer) a substantial contribution to sustainable transport which is not made by existing residents in an area. The clause should be deleted as it is not equitable and therefore not sound or justified	Proposed removal of CS20 part d. In respect to Policy CS20 part h. permit free development is typically applied when existing parking is at a premium and there is good public transport provision in the locality.	Proposed removal to CS20 part d contained in Core Strategy Errata Sheet. No change proposed to Policy CS20 part h	
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REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Pinchin	26 Transport - Policy CS19 Public	Paragraph d. 'Seeking sustainable transport contributions towards the improvement of transport infrastructure through planning obligations' is not sound or justified and should be deleted. Reason: The policy is onerous and is a deterrent to new development where ever increasing sums are required to be paid to the local authority as educational, open space and transport contributions, making many schemes uneconomic to build. Sustainable transport should where necessary be funded or subsidised through council tax and not by a tax on new development. The requirement is doubly onerous where residents of new developments are not allowed to hold parking permits (Policy CS20), so that they are doubly penalised compared to existing residents. Policy CS19 should also include a positive policy to encourage sustainable forms of transport such as low pollution small frequent buses (half the length of existing single decker buses). Reason: to promote a greener borough.	Legislation sets out the criteria for the consideration of planning obligations. This element of the policy is to provide greater clarity that Merton Council intends to seek obligations in connection with sustainable transport.	No change proposed	

REPRES NTOR	POLICY REFEREN CE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Pinchin	26 Transport - include cycling, ie: 'A series of key Policies 18- walking and cycling routes will be 20 - identified and implemented .'. Reason: Delivery To comply with the policy of promoting and active transport (walking and cycling) Monitoring in the borough.	Agree with rephrasing	P168 Delivery and Monitoring Paragraph 2 to be amended ' A series of key walking and cycling routes through TfL's Local Implementation programme. They will be afforded high priority within the Local Implementation Programme and implemented with TfL's Best Practice for Walking and Cycling Schemes		

POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Paragraphs 27.2 — 27.9	<p>It is unsound because it is not effective. (1.) Paragraphs 27.2 — 27.9 discuss the Council's partners, but do not sufficiently recognize the importance of local community groups. The role of the Council-led Community Forums is no substitute for direct contact between Council Officers and Members and individual community groups, with their specialist local knowledge.</p> <p>Suggested wording 27.5/6: Add 7: "Local Community Groups, with their close knowledge of the needs of their areas".</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	

POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Para 27.34 last indent	<p>(2) Paragraph 27.34 last indent: The discussion of Wimbledon Town Centre does not include the setting up of a Business Improvement District, nor the provision of a new Performance Space/Civic Hall. Suggested changes 27.34 Wimbledon: Add: "...town centre management and promoting the Wimbledon "brand" in conjunction with the Economic Development Strategy, and facilitating the move towards being a Business Improvement District, in conjunction... Suggested changes 27.34 Wimbledon: Add: "The creation of a new Performance Space / Civic Hall would enhance the attraction of the town centre, and remains an aspiration of the Council"</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	
Table 27.2	<p>(3) Table 27.2: No cost estimates are given for items 7ABFH</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	

POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Table 27.2	(4) Table 27.2: items 8B & C: No mention is made of reduced energy use, or proximity lighting.		Under review for most up to date information and following statement of common ground preparations.	

POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Table 27.2	<p>Strategic Requirement 3N. New access road: £6m Road from Carshalton Road onto Willow Lane, Mitcham The text states that the need for the new access road from Carshalton Road onto Willow Lane is to facilitate the regeneration of Willow Lane and that it may be partly funded by Section 106 contributions. TfL is, however, under the impression Merton Council wishes to see a new tram stop at Willow Lane to serve the same purpose. Tramlink has been working towards provision of a new tram stop at Willow Lane on the basis that Section 106 money would be available for this purpose. The Council should clarify whether it still wishes to see a new tram stop at Willow Lane and if that is the case how it intends to fund this if Section 106 contributions are to be used for the new road instead</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	

POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Table 27.2	<p>. <i>Strategic Requirement 7F: Bus route improvements including improved provision in Mitcham and Pollards Hill</i> TfL queries why Network Rail is listed as a potential source of funding for this project. It is appropriately listed under 7G</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	
Table 27.2	<p>Strategic Requirement 7G: Station improvements at Wimbledon and Raynes Park TfL is identified as a potential source of funding for station improvements at these stations but at present has not budgeted or planned to provide funding for this scheme. TfL would expect other potential sources of funding including (South West Trains, Department for Transport, Section 106) to be listed here.</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	

POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Table 27.2	<p>Strategic Requirement 7G: <i>Aspiration for Crossrail Line 2 (Chelsea – Hackney line) to serve the borough</i> TfL is listed as a potential source of funding however at present TfL has not budgeted or planned to provide funding for this scheme. Further more it should be noted that the scheme is very long term</p>		<p>Under review for most up to date information and following statement of common ground preparations.</p>	

REPRESE NTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	(e.g. Policy 1 Colliers Wood) 28 Monitoring	The monitoring framework for SO5 as set out in Section 28 needs to be broadened to reflect the full scope of the strategic objective for increasing public health and wellbeing, reflecting the 5 priorities set out in the objective. In particular, promoting sport, play and physical activity.	Yes would agree not much included under SO5 currently	All officers need to state how each of the following policies are supporting SO5: Housing, Infrastructure, Open space, Design, Climate change, Flood risk, Waste management and Transport.	YES

REPRESE NTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	28 Monitoring	The monitoring framework for SO7 should also include monitoring of impact on increasing active travel - impact on increasing physical activity as part of everyday activity e.g. walking to work and school.	Can include something but need to clarify with transport planning.	Insert additional entry for Policy 18 Active Transport. Indicator: Percentage of trips made by walking (TBC by transport). Borough Target: To increase the proportion of trips made using sustainable modes by 1% per year from 2004 base of 34% (TBC that this is the most appropriate target).	YES
Susan Sheahan for Env Agency	28 Monitoring	EA are suggesting that the borough target wording should be altered.	Amend text	Amend wording as follows: Indicator: Improve flood risk management(N I189) Borough Target: Percentage of agreed actions... undertaken satisfactorily in line with Merton's NI 189 Flood Risk Management Plan	Not specified

REPRESE NTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Highways Agency	28 Monitoring	HA are suggesting that reducing car trips should be included as a monitoring indicator within Table 28.1.	This needs to be confirmed by the transport planners.	Add wording to SO1 part of table 28.1 as follows: Indicator: Reduction in number of trips made by car. Borough Target: To increase the proportion of trips made using sustainable modes by 1% per year from 2004 base of 34% (TBC that this is the most appropriate target)	Not specified

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Andrew Grimes for PCT	Chapter 4 Para4.18/4.19	The PCT use different projections and are suggesting we should consider alternatives as well as mapping projections by Ward. Suggest the PCT and Merton should agree a suitable population baseline.	Paragraphs 4.18- 4.21 to included reference to differing population scenarios. As set out in paragraph 4.18, planning for large-scale infrastructure should take account of the highest population projections, it is important that detailed analysis and planning at borough and ward level consider the most specific, detailed, local population projections, i.e. those that have taken the construction of new homes into account. This matter will be considered further and a Statement of Common Ground sought between the PCT and Merton Council, which may propose changes to Merton's Core Strategy.	Under consideration YES
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REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	Chapter 4 Para 4.23	The Core Strategy should include a map of deprivation with the health and disability domain maps. Strategic Objective 2 (a) is welcomed, but should be re-worded as: Promoting socially mixed, sustainable, vibrant safe and healthy communities especially in areas of deprivation;	Objective 2 covers all areas of the borough, including any areas of deprivation	No change proposed YES
Andrew Grimes for PCT	Issues and Opportunities:	The Core Strategy should make explicit links to health planning, health improvement and protection as a cross cutting theme. Specifically the strategy should identify health issues most susceptible to spatial planning. Para 5.5 should refer to link between climate change and poor health. Para 5.15 could refer to changing healthcare needs from a younger and more diverse population.	This matter will be considered via a Statement of Common Ground between Merton Council and the PCT, which may propose changes to Merton's Core Strategy.	Under consideration YES

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES REQUESTED TO ATTEND EXAMINATION?
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Andrew Grimes for PCT	Issues and Opportunities: 5.22 and also chpt 10 and 11	Sub Areas: (1) Wimbledon, (2) Raynes Park, (3) Colliers Wood/South Wimbledon, (4) Morden and (5) Mitcham?The sub-areas do not align with current PCT strategies. This will need to be taken forward by GP Consortia (as yet to be defined) who will commission services in the future.	The sub-areas are representations of Merton's communities; there is no intention to consider these as fixed boundaries or to align with any administrative units.	No change proposed
				YES

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REPRES NTOR	POLICY REFERENC E	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Zbigniew Blonski	Vision and objectives	Generally felt unsound. Due to the fact that we do not address sport and leisure in the CS. States that LB Merton contains a large number of sports facilities/stadiums yet neither the spatial vision nor the objectives address what the Council's strategy is towards these very significant and important aspects of the borough. It therefore fails to provide an effective and adequate basis for the spatial planning of the borough and the core strategy is unsound on this basis.	leisure sport and recreation is addressed in policy CS13 and under (I) in the spatial vision.	No change proposed	Not specified
Zbigniew Blonski	Vision and objectives	In terms of a 15 year strategy there is a need for the Council to set out its approach to improvement, support or any other alternative approach to such as sporting/leisure facilities which cater for spectator as well as active participation by residents and others in sports activities.	Could consider adding no change text regarding spectator sports?	No change proposed	Not specified
Zbigniew Blonski	Vision and objectives	Response relates to proposals for new sports stadiums or expansion of existing facilities, stating <i>It is not appropriate nor adequate to seek to delegate policy or guidance on these issues to subordinate Development Plan Documents such as development management and site allocations</i>	Merton's Core Strategy supports proposals for a stadium should any sporting club wish to pursue this approach.	No change proposed	Not specified

REPRES NTOR	POLICY REFERENC E	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Zbigniew Blonski	Vision and objectives	Not addressing leisure, sports and recreation is a major omission not consistent with national or London Plan policy, nor justified or sound as these are all key issues in setting the framework for spatial planning in the borough. Therefore the core strategy is not sound in these respects.	Merton's Core Strategy vision (point ii), objectives and policies, including policy CS13 address leisure, sport and recreation	No change proposed	Not specified
Zbigniew Blonski	Vision and objectives	Suggested wording for Vision: <i>Improving existing sporting and leisure assets together with supporting the development of new facilities including the provision of a stadium for AFC Wimbledon.</i>	Merton's Core Strategy vision (point ii) supports sport and recreation without specifying a specific club	No change proposed	
Andrew Grimes for PCT	Chapter 7 Spatial vision (i) / para 7.5/7.7	The Vision should refer to creating healthier, safer and stronger communities to reflect the themes in the Community Plan, including access to healthcare and other social infrastructure. Para 7.7– although welcomed, health improvement is only mentioned as a 5 year vision and needs to consider what can be achieved in the whole period of the strategy over 15 years and to provide a legacy in the longer term.	Under consideration	Under consideration via a Statement of Common Ground between Merton and the PCT	Not specified

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Workspace Group		<p>In support but suggest working with developers and land owners to identify and bring forward new sites to promote renewable energy generation within the Borough. Indeed, future policy should reflect the targets/objectives set down within the emerging London Plan (October 2009), namely:</p> <ul style="list-style-type: none"> - to generate 25% of heat and power used in London to be generated through the use of localised decentralised energy systems by 2025 (Strategic Policy 5.5); - to increase the proportion of energy generated from renewable sources – in-line with the minimum targets set out within Strategic Policy 5.7 and table 5.1; - to support and encourage more widespread use of innovative energy technologies – including advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis for the treatment of waste (Strategic Policy 5.8). 	<p>The London Plan is part of the development plan for Merton. Guidance clearly states that Core Strategies should not repeat national or regional policies</p>		YES

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Workspace Group		(Representation continued). In addition, the Council should also include an additional objective to work alongside the partner Boroughs within the South London Waste Partnership to achieve the apportionment targets for improving self sufficiency in waste managed in London – as set down in the emerging London Plan (October 2009) and 'Minor alteration to the Consultation draft replacement London Plan – Borough level waste arisings and apportionments, and corrections and clarifications (December 2009)'. The London Plan is part of the development plan for Merton. Guidance clearly states that Core Strategies should not repeat national or regional policies			YES

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
CB Richard Ellis on behalf of Newridge Trading	Strategic Objective 3	Newridge Trading supports the main thrust of Strategic Objective 3, which seeks to provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. However, Newridge Trading considers that criterion (c) within the objective, which lists one of four ways in which the Council intends to achieve Strategic Objective 3, is not sufficiently flexible and does not represent the most appropriate strategy. Criterion (c) as currently drafted states that the Council will protect "areas of the Borough for uses other than residential". It is considered that additional text should be added to the end of this sentence to read "...where residential use would not , having regard to the other policies of the Plan and the Core Strategy evidence base, generally be considered appropriate" so that criterion (c) is sufficiently flexible.	Each element of each objectives, and the objectives themselves, are not to be interpreted as planning policy. The Core Strategy should be read as a whole	No change proposed.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
CB Richard Ellis on behalf of Newridge Trading	Strategic Objective 4	Strategic Objective 4, which seeks to make Merton more prosperous, with strong and diverse long term economic growth, is supported in principle by Newridge Trading. However, it is considered that it would be beneficial to amend criterion (c) within this objective, which as currently drafted seeks to "maximise opportunities for employment and local businesses" so that text is added to clarify that opportunities for employment should be maximised, but only where this does not conflict with other policy objectives within the Plan (for example the provision of residential accommodation as per Strategic Objective 3), to seek to ensure the creation of sustainable communities.	Each element of each objectives, and the objectives themselves, are not to be interpreted as planning policy. The Core Strategy should be read as a whole	No change proposed.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
CB Richard Ellis on behalf of Newridge Trading	Paragraph 10.3	Paragraph 10.3 of the Submission Version of the Core Strategy confirms that "while the Core Strategy sets out the overarching vision and objectives for each sub-area, it will be for other plans to set out the detailed guidance to take these forward". Paragraph 4.45 of PPS12 clearly states, inter alia, that "Core Strategies should show how the vision, objectives and strategy for the area will be delivered and by whom, and when". Demonstrating deliverability, as well as articulating the overarching vision and objectives for the Borough, should therefore be a fundamental component of the Core Strategy.	Paragraph 10.3 is intended to demonstrate that site-specific issues may be set out in subsequent LDF documents.	Revise paragraph to improve clarity	
Andrew Grimes for PCT	SO1	SO1 should make the link between environmental improvement and health –particularly SO1.(e)	Under review	Under review via Statement of Common Ground between Merton Council and PCT	No change proposed.
Andrew Grimes for PCT	SO2	Strategic Objective 2 (a) is welcomed, but should be re-worded as: Promoting socially mixed, sustainable, vibrant safe and healthy communities especially in areas of deprivation;	As is currently worded, Strategic Objective 2 applies to all areas of the borough		

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	S03	<p>S03 (d) needs to explicitly state "healthcare provision" with examples such as community health services. However if healthcare is included in the definition of community services and infrastructure (see para 19.4) this will not be required. The strategy needs to use consistent terminology.</p>	<p>Healthcare is included in the definition of community services and infrastructure</p>	<p>No change proposed.</p>	
Andrew Grimes for PCT	S05	<p>The PCT welcomes S05 - Explicit strategic objective for health(a) could be replaced with: Addressing the adverse health impacts of development and improving access to healthy food(c) should explicitly include access to healthcare.(d) should be reworded "Improving access to nature, open spaces and leisure facilities including opportunities for sport, play and relaxation;And adding (f) Encouraging active travel by promoting walking and cycling.</p>	<p>(a) as is currently worded, the meaning is more inclusive that that proposed. (c.) agreed (d) agreed (f) could overlap with Strategic Objective 7 and 1 - under review</p>	<p>(c.) and (d) agreed minor changes; (f) under review</p>	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Andrew Grimes for PCT	SO4	Strategic Objective 4 needs to recognise the health benefits of employment and issues related to unemployment	While this is noted, it would be very detailed for a strategic objective. The Strategic Objective supports employment without intending to detail its many benefits to individuals and society	No change proposed.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Zbigniew Blonski	S05	<p>Felt unsound. The strategic objectives do not refer to sports, recreation or leisure which are fundamental to such objectives as Strategic Objective 5 – to make Merton a healthier and better place for people to live and work in or visit.</p> <p>A further sub-clause should be added to this Strategic Objective:</p> <p><i>Supporting improvements to sports and leisure facilities, including sports stadiums and other facilities for participative and spectator.</i></p> <p>Not addressing leisure, sports and recreation is a major omission not consistent with national or London Plan policy, nor justified or sound as these are all key issues in setting the framework for spatial planning in the borough. Therefore the core strategy is not sound in these respects.</p>	<p>As is currently worded, Strategic Objective 5 (d) specifies improving access to facilities for leisure, sport and play.</p>	<p>Will consider the addition of "recreation" or substitution for "play"</p>	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Merton Priority Homes	S03	We fully support Strategic Objective 3: To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space		No change proposed.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Iain Simpson for the Wimbledo n Society	Chpt 9	<p>Unsound because an internally inconsistent plan. Points raised are: 1. No evidence that Strategic Objectives 3 & 4 are deliverable without putting at risk Strategic Objective 8. 2. Do not attempt to face up to the conflicting ideas which emerge from the different sectoral policies. There is no reference to the potential conflict between accommodating/encouraging growth, and protecting urban character and green space, and no indication of how conflicts between objectives are to be resolved.3. During Spatial Policy Options consultation, the Council put forward three options, the WS chose a plan led system, "the Council should take an active role in planning for the growth in the chosen areas".</p> <p>The Core Strategy does not address the issue of how the Council would facilitate and guide growth in the chosen areas, and this makes it impossible to assess the implications of this growth, both generally and for additional housing in particular (see also the comment on CS 9).</p>	<p>The Core Strategy provides indicative growth for residential development, based on a large amount of evidence including existing planning applications, land availability, local character assessment and a thorough analysis of development trends over the past 10 years. The direction for commercial growth is clearly set out throughout the plan including Policies CS.7 Centres, CS.12 Economic Development and in the six sub-area policies. These policies. together</p>	<p>No change proposed.</p>	<p>YES</p>

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Workspac e Group	S06	<p>Generally in support but unsound. As per the policy objectives set out within the emerging London Plan (October 2009) in relation to tackling climate change, recommend the Council add the following objectives:</p> <ul style="list-style-type: none"> - to generate 25% of heat and power used in London to be generated through the use of localised decentralised energy systems by 2025; - to increase the proportion of energy generated from renewable sources – in-line with the minimum targets set out within Strategic Policy 5.7 and table 5.1; - to support and encourage more widespread use of innovative energy technologies – including advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis for the treatment of waste. 	<p>The London Plan is part of the development plan for Merton, as such these policies already apply. Guidance is clear that national or regional policy should not be repeated in local plans.</p>	<p>Under review for most up to date information and following statement of common ground preparations</p>	YES

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
CB Richard Ellis on behalf of Newridge Trading	SO4	<p>However, as per the objectives set out with emerging Strategic Policies 2.7 (Outer London: Economy) and Policy 4.1 (Developing London' Economy), it is also recommended that the Council also adopt the following objectives:</p> <ul style="list-style-type: none"> - managing/improving industrial land to meet the needs of small and medium enterprises (SMEs), start-ups and businesses requiring more affordable workspace; - ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for both larger and small and medium sized enterprises. - the regeneration of the existing employment sites to improve the quality and range of jobs within the Borough 	<p>The London Plan is part of the development plan for Merton, as such these policies already apply. Guidance is clear that national or regional policy should not be repeated in local plans.</p>	No change proposed.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Workspac SO3 e Group		Generally in support but unsound. As per the objectives of emerging London Plan (October 2009) Policy 3.3, recommend that the following is also added to the objective list: e. supporting the provision of residential accommodation through mixed-use redevelopment, especially of surplus commercial capacity.		No change proposed.	
Workspac SO1 e Group		Generally in support but unsound. To ensure consistency with emerging London Plan Policy 5.8 believe following objective should be added to the text: f. supporting and encouraging more widespread use of innovative energy technologies – including advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis for the treatment of waste.	The London Plan is part of the development plan for Merton, as such these policies already apply. Guidance is clear that national or regional policy should not be repeated in local plans.	No change proposed.	

REPRESENTOR	POLICY REFERENCE	SUMMARY OF REPRESENTATION	RESPONSE	SUGGESTED CHANGES	REQUESTED TO ATTEND EXAMINATION?
Crest Nicholson	S08	<p>Strategic Objective 8</p> <p>We support the promotion of a high quality urban and suburban environment. However in order to ensure the delivery of high quality design requires a flexible and balanced approach to maximise the opportunities of any given site. Such a flexible approach would also allow the site's constraints to be taken into consideration in order to deliver a sufficiently viable development that also accords with planning policies.</p> <p>It is therefore proposed to include a further point into the policy as follows:</p> <p>d. having regard to the site's individual characteristics including development viability and policies contained elsewhere in the Core Strategy.</p>	<p>Each element of each objectives, and the objectives themselves, are not to be interpreted as planning policy. The Core Strategy should be read as a whole. CS.14 sets out the Council's priority for high quality design.</p>	<p>No change proposed.</p>	<p>YES</p>