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Merton Council

Cabinet Agenda

Membership

Councillors:

Stephen Alambritis (Chair)
Mark Allison
Laxmi Attawar
Tobin Byers
Caroline Cooper-Marbiah
Edith Macauley MBE
Eleanor Stringer
Martin Whelton

Date: Monday 15 June 2020

Time: 7.15 pm

Venue: This will be a virtual meeting and therefore will not take place in a physical location, in accordance with s78 of the Coronavirus Act 2020.

This is a public meeting and can be viewed by following this link
<https://www.youtube.com/user/MertonCouncil>.

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Cabinet Agenda

15 June 2020

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2	Declarations of pecuniary interest	
3	Minutes of the previous meeting	1 - 4
4	The Council's response to the Covid-19 pandemic	To Follow
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7	Adoption of Merton's sustainable drainage supplementary planning document	53 - 64
8	Adoption of Merton's Statement of Community Involvement (planning)	65 - 144
9	Additions to the Local List	145 - 184
10	London Borough of Merton insurance Tender	185 - 190
11	Exclusion of the public To RESOLVE that the public are excluded from the meeting during consideration of the following appendices on the grounds that it they are exempt from disclosure for the reasons stated in the associated report.	
12	London Borough of Merton Insurance Tender - Exempt appendices	191 - 320

Note on declarations of interest

Members are advised to declare any Disclosable Pecuniary Interest in any matter to be considered at the meeting. If a pecuniary interest is declared they should withdraw from the meeting room during the whole of the consideration of that matter and must not participate in any vote on that matter. If members consider they should not participate because of a non-pecuniary interest which may give rise to a perception of bias, they should declare this, withdraw and not participate in consideration of the item. For further advice please speak with the Managing Director, South London Legal Partnership.

Agenda Item 3

All minutes are draft until agreed at the next meeting of the committee/panel. To find out the date of the next meeting please check the calendar of events at your local library or online at www.merton.gov.uk/committee.

CABINET

28 APRIL 2020

(6.30 pm - 7.50 pm)

PRESENT: Councillors Stephen Alambritis (in the Chair), Mark Allison, Laxmi Attawar, Tobin Byers, Caroline Cooper-Marbiah, Edith Macauley MBE, Eleanor Stringer and Martin Whelton

ALSO PRESENT: Ged Curran (Chief Executive), Hannah Doody (Director of Community and Housing), Caroline Holland (Director of Corporate Services), Chris Lee (Director of Environment and Regeneration), Rachael Wardell (Director, Children, Schools & Families Department), Louise Round (Managing Director, South London Legal Partnership and Monitoring Officer), Matt Burrows (Head of Communications and Customer Experience) and Louise Fleming (Senior Democratic Services Officer)

1 APOLOGIES FOR ABSENCE (Agenda Item 1)

No apologies were received.

2 DECLARATIONS OF PECUNIARY INTEREST (Agenda Item 2)

There were no declarations of interest.

3 MINUTES OF THE PREVIOUS MEETING (Agenda Item 3)

RESOLVED: That the minutes of the meeting held on 23 March 2020 are agreed as an accurate record.

4 THE COUNCIL'S RESPONSE TO THE COVID-19 PANDEMIC (Agenda Item 4)

The Chair welcomed everyone to the first virtual meeting of Cabinet which was being broadcast on YouTube.

The Chair expressed pride at the work done to keep people safe and to support the most vulnerable in Merton and extended his condolences to the families of the 64 Merton residents who had lost their lives to Covid-19.

Merton had almost 3000 vulnerable residents classified at most at risk under Operation Shield and the Council had contacted each one to ensure they were supported and cared for.

The Chair thanked teams from Finance and Business Rates for diligently supporting the borough's local small businesses. The Council was in the top 3 boroughs in London for the percentage of grants distributed to local businesses in Merton to help them through the crisis.

At the invitation of the Chair, the Chief Executive placed on record his thanks for the work of all the staff in Merton to keep services going in these very difficult circumstances. He also summarised the organisational framework, both in Merton and regionally, as referenced in the report.

The Chair invited contributions from the Cabinet Members as follows:

The Cabinet Member for Adult Social Care, Health and the Environment thanked the Director of Community & Housing and the Director of Public Health and their respective teams for their exceptional responses. He gave an update on hospital discharges, capacity and bed availability in care homes, PPE and access to testing.

On the agreement of the Chair, he read out a message from the South West London CCG on the NHS COVID-19 response.

The statement paid tribute to all health and care colleagues who were working tirelessly on the frontline to respond to COVID-19, who had shown exceptional resilience and commitment every day by caring for the patients who totally relied on their expertise, compassion and professionalism. It also described how the four hospitals which served Merton residents – Croydon, Epsom St Helier, Kingston and St George's were collaborating closely, along with other service providers and GP practices, to ensure there was an effective and consistent approach to patient care.

The Director of Community and Housing outlined the 21 Care homes in the borough receiving daily contact from the Council and Merton had mobilised an oversight group with NHS colleagues, public health and care home representatives. The purpose of this group was to ensure homes with cases of Covid-19 received wrap-around support and an immediate response service, including support with infection control measures and use of PPE.

The Cabinet Member for Voluntary Sector, Partnerships and Community Safety thanked the Borough Commander and Police Team for keeping the community safe. She also expressed thanks to MVSC and the volunteer sector.

The Deputy Leader and Cabinet Member for Finance further highlighted the work of the voluntary sector including, AGE UK, FISH, Wimbledon Guild, Wimbledon Food Bank, Community Development Trust, Dons for Action and Merton Mutual Aid. He also drew the Cabinets attention to the extent of work being done to tackle hardship in the borough.

With a growing number of residents facing financial hardship, the Council had launched additional support for those on low incomes –reducing council tax bills for those who need financial support the most (adults who already qualify for council tax support). This would take £200 off the balance of their bills this year.

The Director of Corporate Services advised that the Council had distributed £23.5million in grants to over 90% of Merton small businesses.

The Cabinet Member for Schools and Adult Education remarked on the many compliments she had received about the Merton Council Team for the support given to Head Teachers and Schools in this period. She also reported on good news from the Merton team responsible for supporting Merton's vulnerable young people to find employment. They had successfully found paid roles for some of the borough's most disadvantaged teenagers.

The Cabinet Member for Women and Equalities commented on the work of Safer Merton who were monitoring domestic violence reports in the borough. The One Stop Shop was still open remotely and Members were working with Officers to encourage and enable vulnerable people to report cases. This included increasing social media communications about the support available and ways to make reporting easier for vulnerable people.

The Cabinet Member for Commerce, Leisure and Culture thanked Merton staff for their hard work under these difficult circumstances to keep the borough's parks and green spaces open.

The Cabinet Member for Regeneration, Housing and Transport thanked officers in housing needs, future Merton, highways and parking for their work during these challenging times. There had been a rise in rough sleepers in the borough, bringing the figure to 41. 35 had been placed in accommodation with offers made to the remaining 6, which had been declined. Outreach teams were continuing to work with those rough sleepers and to date there had been no reported cases of Covid-19 among them. It was noted that the Council had been able to issue a large number of free parking permits to NHS and social care staff to carry out their essential support. In response to questions from Cabinet Members, the Cabinet Member advised that the Council was working with its partners to ensure that victims of domestic abuse were rehoused and that vulnerable people were protected.

The Chair thanked all those present for their contributions.

RESOLVED:

That Cabinet notes the steps taken by the Council in response to the Covid-19 Pandemic

5 CHANGES TO CABINET PORTFOLIOS (Agenda Item 5)

The Chair thanked Councillor Eleanor Stringer for taking on the role of Cabinet Member for Children's Services and Education; and thanked Cllr Kelly Braund for her work over the last two years as the previous Cabinet Member for Children's Services.

RESOLVED:

1. That the Cabinet notes the changes to the appointments to the Cabinet including their respective portfolios (Appendix A); and
2. That the Cabinet appointments will be reported to the next available Council meeting for noting and to recommend that the Council's Constitution is updated accordingly.

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Cabinet

15 June 2020

Wards: All

Merton's Active & Healthy Travel Response to Covid-19

Lead officer: Chris Lee. Director for Environment & Regeneration

Lead member: Cllr Martin Whelton. Member for Regeneration, Housing and Transport

Contact officer: Paul McGarry. Head of Future Merton

Recommendations:

- A. That Cabinet endorse Merton's Active & Healthy Travel Response to Covid-19
 - B. That Cabinet note the submission of funding bids to Department for Transport and Transport for London and that the extent of projects delivered will be dependent on the funding made available to the Council
-

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. Merton Council has prepared an emergency transport response to the Coronavirus pandemic and to aid social distancing in the borough. The plan is focused on making changes to roads and pavements in the borough to improve road safety, support social distancing and provide more space for walking and cycling.
- 1.2. Pavements will be extended into the road at some of the busiest parts of the borough such as town centres and local shopping parades.
- 1.3. The emergency changes will be followed by longer term work to improve walking and cycling routes throughout the borough. The plans will also look to keep Merton moving safely as travel patterns change and restrictions ease through the promotion of Low Traffic Neighbourhoods and School Streets.
- 1.4. The plan sets out the Council's priorities for action, as a framework for funding bids to DFT and TFL to deliver the programme.

2 DETAILS

- 2.1. The natural desire in many policy areas may be to seek a return to the status-quo pre-Covid19. Whilst this may be true for health, education and the economy this is not necessarily the case for environment and transport objectives.
- 2.2. Pre-covid-19, our borough, and London as a whole, was suffering from poor air quality and traffic congestion. We had ambitious but challenging objectives across a number of Council strategies aimed at reducing emissions and promoting active travel;

- Merton’s Air Quality Action Plan
- Merton’s Public Health and Wellbeing Strategy
- Merton’s Climate Emergency Action Plan
- Merton’s Transport Strategy

2.3. Whilst the aims and objectives of these strategies remain sound, the context in which the actions sit has changed significantly

2.4. Transport for London have launched the London Streetspace plan to radically overhaul London’s streets to accommodate a possible ten-fold increase in cycling and fivefold increase in walking as lockdown eases.

2.5. Merton is fortunate to have good public transport accessibility; but with London’s public transport capacity potentially running at a fifth of pre-covid levels, thousands of journeys a day will need to be made by other means. If Merton’s residents switch only a fraction of these journeys to cars, our borough risks grinding to a halt, air quality will worsen, and road danger will increase.

2.6. To respond to this situation, Merton Council will repurpose some of our borough’s streets and key locations to serve this unprecedented demand for walking and cycling in a major strategic shift to meet our long terms sustainability and active travel goals.

2.7. Our priorities are as follows:

Short term: pavement widening to support local business and high streets

Medium term: supporting schools and developing a range of school streets for September re-opening.

Medium-long term: developing strategic cycle infrastructure and Low-Traffic Neighbourhood interventions utilising TFL and Government funding.

	SHORT TERM <i>Emergency</i>	MEDIUM TERM <i>Recovery</i>	LONG TERM <i>Transformation</i>
High Streets and social distancing	Widen pavements in high footfall locations to support businesses reopening. This will involve reallocation of on-street parking bays.		
Commuting / Cycling	Create space for cyclists along key routes in the borough.	Plan with public transport providers, space to queue at rail and underground stations to support social distancing. Identify and fill gaps in Merton’s cycle network and install temporary cycle priority schemes.	In supporting the modal shift to walking and cycling, seek to make permanent, wider footways and cycle lanes to achieve the objectives of the transport strategy
Low traffic neighbourhoods and School Streets	Support Schools with on-site social distancing measures.	Plan for pupils returning to school, promote measures for greater walking and cycling routes to school	Supporting modal shift and improving road safety through low traffic neighbourhood

- 2.8. Priorities for funding concentrate on three key areas:
- Quickly building a strategic cycling network, using temporary materials and including new routes, to help reduce crowding on the Tube and trains and on busy bus routes
 - Changing town centres so local journeys can be safely walked and cycled where possible, for example with wider pavements on high streets to give space for queues outside shops as people safely walk past while socially distancing
 - Reducing traffic on residential streets, creating low-traffic corridors right across London so more people can walk and cycle as part of their daily routine
- 2.9. Some of the temporary changes we're making could become permanent in the longer term subject to funding.

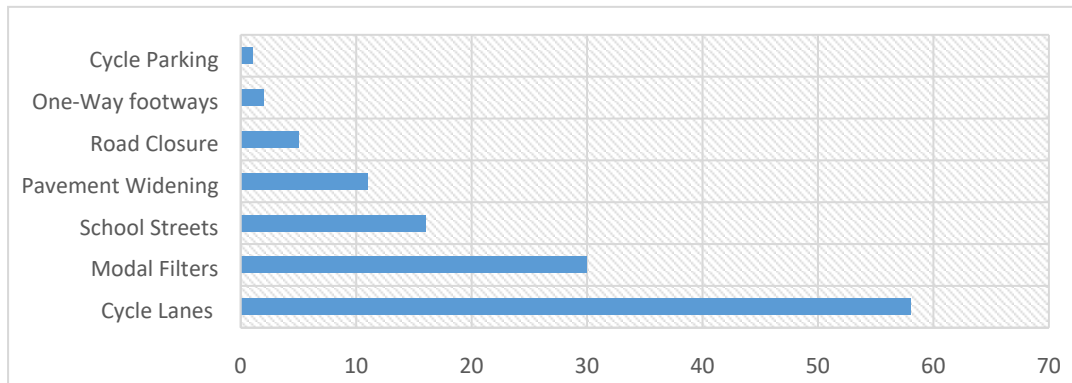
3 ALTERNATIVE OPTIONS

- 3.1. Road safety and active travel measures are normally funded via TFL LIP which has now been suspended by TFL for 2020/21.
- 3.2. This plan sets out a strategy to maximise funding opportunities to deliver on measures that will support social distancing and mitigate the impact of covid-19 on local transport services.
- 3.3. The alternative of not providing social distancing or active travel measures to alleviate pressure on public transport could lead to failure in mitigating the spread of Covid-19.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. A draft of this plan was published online on 7th May 2020 and promoted via the Council's social media channels where the council invited comments and suggestions for locations where we could deliver changes to our streets.
- 4.2. Officers and councillors have held regular online with the Merton Residents Transport Group (newly formed to input to this issue) as well as key stakeholders such as Merton Cycling Campaign, local business groups, schools and the Sustainable Communities Transport Partnership.
- 4.3. Since the draft was first published, the council received over 100 representations containing over 350 projects and actions.
- 4.4. The greatest demand is for cycle lanes and low traffic neighbourhoods (modal filters) followed by school streets.
- 4.5. Officers have compiled the responses into a long-list of potential schemes (removing duplicates where the same idea was suggested multiple times). The long-list of responses is in Appendix D of this report.

4.6. The graph below shows the interventions with the greatest level of interest.



4.7. The Council will continue to meet legal requirements relating to statutory consultation and will engage with key local stakeholders, but it will be necessary to accelerate this process since it is an emergency response to Covid-19 and 'in depth' engagement will not be possible without prolonging timescales.

4.8. The initial phase of intervention locations has been developed through a combination of officer observations, feedback from business groups, local councillors and engaging digitally with residents. We will be launching a web-based mapping portal to enhance our digital engagement with residents as the projects develop.

4.9. Street trials and experimental measures may be used as part of an ongoing engagement process. Emergency services and Waste collection providers will be key stakeholder who will be closely involved in the development of schemes and consulted with as part of the statutory process.

5 TIMETABLE

5.1. 5th June Bid pro-forma to be submitted to DFT
15th June Cabinet to endorse the updated plan.
19th June Bids to be submitted to TFL
24th June Merton Overview & Scrutiny Panel

5.2. Ongoing delivery of TFL funded schemes is dependent on when TFL allocates funding. Roll out of medium-long term projects is expected to be from July-August 2020 and the rest of the financial year.

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

6.1. The Council has set aside £80,000 from existing Highway budgets for immediate pavement widening schemes.

6.2. Merton has been allocated from the government, with the first £100,000 tranche available to be bid for on 5th June.

6.3. TFL have launched a £45m fund for Streetspace for London programme. Bids are to be submitted by 19th June. Merton will be using the Active & Healthy Travel Response to Covid-19 document and the input received from community engagement to form our bids to TFL.

- 6.4. The estimated cost of delivering the programme for the next 6 months is c£490,000 including the cost of equipment, engineering and design resources, making Experimental Traffic Orders, managing the communications and consultation throughout and maintaining the temporary measures on-site.
- 6.5. It is proposed that this is funded initially from the Council's existing Highway budget, pending further funding from TFL, DFT or Community Infrastructure Levy.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. Any measures, particularly changes to the highway, must be carefully considered and sit within the existing policy framework and legislations, including our approach to road safety and in response to the Covid-19 public health emergency.
- 7.2. Although the various highway and traffic legislations continue to apply, certain alternatives are being permitted to enable speedy implementations of the necessary social distancing measures.
- 7.3. The use of Experimental Orders, temporary Orders and emergency Orders are recommended. Additionally, in terms of how the Council can communicate its intentions during the statutory consultation, publications in the local newspapers will continue as well as the erection of notices on lamp columns in affected areas.
- 7.4. However, since Deposited documents cannot be inspected at libraries and at the civic centre, the Council is now permitted to have the Deposited documents available on the Council's website.
- 7.5. There is no legal requirement for door to door newsletters. The Council is still responsible to consult all statutory bodies such as emergency services.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. COVID-19 has disproportionately affected vulnerable populations, including those living in more deprived areas. Those living in more deprived areas are already more likely to be impacted by exposure to higher levels of air pollution and road danger.
- 8.2. Low-income households are also more likely to work in frontline key-worker roles, which mean they cannot work from home and are less likely to be car-owners, so will be most affected by the reduced capacity on public transport.
- 8.3. This plan seeks to provide safe space for walking and cycling and enables social distancing on public transport for those who need to use it most. Providing additional space for walking and cycling will help support those who are less mobile and those who may be new to cycling.
- 8.4. Any interventions to support walking and cycling are designed holistically to ensure that everyone can move around in safety. When making any changes to street layouts, officers will use existing guidance and best

practice to ensure that these changes don't detract from current accessibility levels and enhance them wherever possible.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1 Section 17 of the Crime and Disorder Act both TfL and boroughs are to consider how to reduce the risk of crime, including acts of terrorism, in their plans, projects and activities. Design of temporary measures will have regard to protecting people in public space and mitigating risks of danger.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. None for the purpose of this report

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix A: Merton's Active & Healthy Travel Response to Covid-19
- Appendix B: Schemes in delivery by Merton Council
- Appendix C: Schemes prioritised for funding bids
- Appendix D: List of suggestions received through community engagement.

12 BACKGROUND PAPERS

- 12.1. Merton's adopted Transport Strategy (TFL LIP3) Local Implementation Plan
<https://www.merton.gov.uk/streets-parking-transport/lip3>



HEALTHY & ACTIVE TRAVEL

COVID-19 TRANSPORT PLAN JUNE 2020

Merton's Active & Healthy Travel Response to Covid-19

Introduction

Merton Council has prepared an emergency transport response to the Coronavirus pandemic and to aid social distancing in the borough. The plan is focused on making changes to roads and pavements in the borough to improve road safety, support social distancing and provide more space for walking and cycling.

Pavements will be extended into the road at some of the busiest parts of the borough such as town centres and local shopping parades to support the local economy and aid social distancing.

The emergency changes will be followed by longer term work to improve walking and cycling routes throughout the borough. The plans will also look to keep Merton moving safely as travel patterns change and restrictions ease through the introduction of low traffic neighbourhoods and school streets.

Context

Major events shape our society and the way we experience everyday life in the urban environment.

London's 'great stink' in 1858 caused by sewage in the River Thames caused outbreaks of cholera and was a public health emergency. The response to this crisis was the creation of the Victorian sewer network and the Thames embankments which still serve London to this day as both critical infrastructure and part of London's public realm.

The events of September 11th 2001 changed how we travel through airports. More recent attacks in major cities around the world continue to shape how we travel, how we use public space and how authorities design in security and safety measures in our public realm.

For better or worse, design decisions made in response to major events can impact our daily lives for decades after. Coronavirus is one of the greatest global crises for a generation and social distancing will re-shape how people travel, meet and use our streets and public spaces.

The natural desire in many policy areas may be to seek a return to the status-quo pre-Covid-19. Whilst this may be true for health, education and the economy this is not necessarily the case for environment and transport objectives.

Pre-covid, our borough, and London as a whole, was suffering from poor air quality and traffic congestion. There are ambitious but challenging objectives across a number of Council strategies aimed at reducing emissions and promoting active travel;

- Merton's Air Quality Action Plan
- Merton's Public Health and Wellbeing Strategy
- Merton's Climate Emergency Action Plan
- Merton's Transport Strategy

Transport for London have launched the Streetspace for London plan to radically overhaul London's streets to accommodate a possible ten-fold increase in cycling and five-fold increase in walking when lockdown restrictions are eased.

Merton is fortunate to have good public transport accessibility; but with London's public transport capacity potentially running at a fifth of pre-covid-19 levels, thousands of journeys a day will need to be made by other means. If Merton's residents switch only a fraction of these journeys to cars, our borough risks grinding to a halt, air quality will worsen, and road danger will increase. Without improvements to infrastructure, our residents will be less confident to switch to sustainable travel modes, such as cycling and walking.

To respond to this situation, Merton Council will repurpose some of our borough's streets and key locations to serve this unprecedented demand for walking and cycling in a major strategic shift to meet our long terms sustainability and active travel goals.

Active Travel in Merton

Merton's Transport Strategy (Local Implementation Plan 3) is the council's main transport strategy and sits alongside the council's Local Plan and other future strategies to support sustainable and active travel choices.

The LIP3 contains an overview of the challenges and opportunities in delivering the Mayors' Transport Strategy locally in Merton; a set of borough transport objectives; a short and longer term delivery plan and a series of targets set by Transport for London that we are working towards achieving.

The Coronavirus pandemic is a public health emergency and it has transformed the context within which Merton's transport strategy now sits.

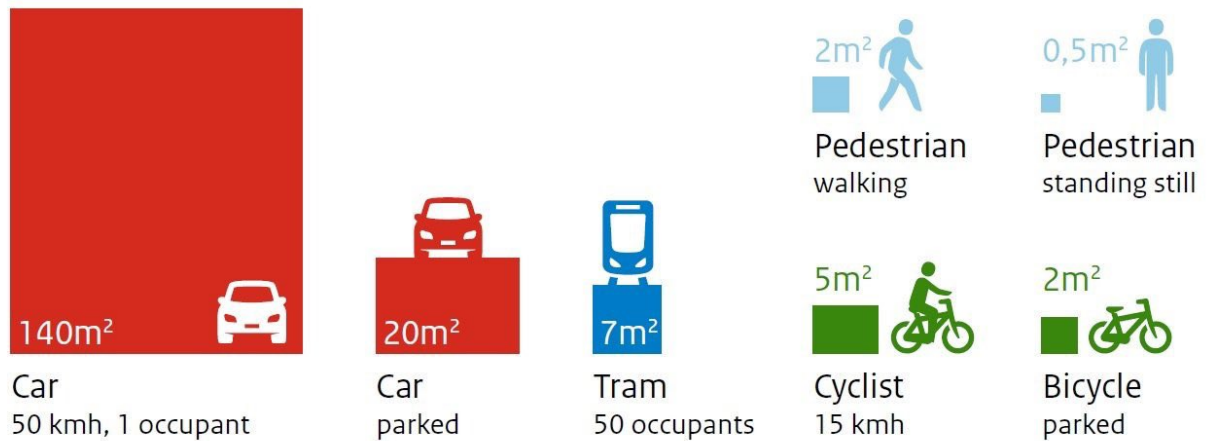
- The need to impose physical social distancing measures in order to reduce virus transmission has introduced new demands on how road space is allocated to pedestrians and cyclists.
- Significantly reduced levels of motor traffic has encouraged many people to turn to walking and cycling, but issues remain with road danger as the police have recorded an increase in speeding. There is increased demand for low traffic neighbourhoods.
- Local businesses are struggling to survive and will need to find new ways to reach their customers online, via increased home delivery or accommodate queuing outside premises.
- Vulnerable people are shielding at home and many are now relying on the council and voluntary sector partners to provide them with essential supplies.
- The need for key workers to access workplaces safely when public transport services are significantly reduced, has highlighted the currently lack of high quality routes for cycling.

The need to support social distancing measures in order to reduce virus transmission has brought into sharp focus some of the inadequacies in how space is allocated on the public highway; both Merton Council's streets and TFL's strategic road network.

We must use our road space more efficiently. Creating more space for walking and cycling is the optimum way of moving people safely with social distancing.

As we prepare to ease lock-down, we need to avoid public transport being overloaded and actively seek to avoid a return to pre-covid road congestion levels by creating more space for pedestrians and cyclists.

When street space is at a premium and with the need to support social distancing, it's worth noting which travel modes are the most space efficient.



Measures suitable to address many of issues above are identified in Merton's LIP3, but now the need to act quickly and at scale has become more pressing – with immediate action required in some cases and consideration of further measures in the medium term.

Merton's Transport Strategy seeks to radically change the status quo and promotes modal shift (away from motorised vehicles) and is a key element of the Council's climate change response and our air quality action plan. Transport emissions account for almost a quarter of Merton's carbon emissions. Therefore, when planning our response to the current situation a key consideration should be avoiding a return to pre-existing motor traffic levels. This move will require traffic restraint, together with measures to further promote and enable sustainable forms of travel.

Public Realm Observations

- 1 There has been a significant drop in town centre and high street activities
- 2 The public realm is being used more for recreation, play and exercise
- 3 Commuting and mobility have decreased significantly
- 4 Local places that offer activity, such as parks and playgrounds are more popular than before
- 5 Some places are too popular where social distancing rules are difficult to follow
- 6 The need for outdoor exercise and access to nature is now more valuable
- 7 More families and children are using our streets for play and cycling than before
- 8 Overall mobility has decreased, but pedestrian movement is increasing at the neighbourhood scale

The recent changes in how people use our streets and spaces presents an opportunity to redefine our streets for the long term; meeting the objectives of Merton's Health & Wellbeing, Air Quality, Climate Change and Transport Strategies.

Sector	CO2 Emissions (kT)	% of Merton's CO2 emissions
Industrial/ commercial gas and electricity	184	30%
Domestic gas and electricity	284	47%
Transport <i>(of which over 99% is road transport)</i>	137	23%

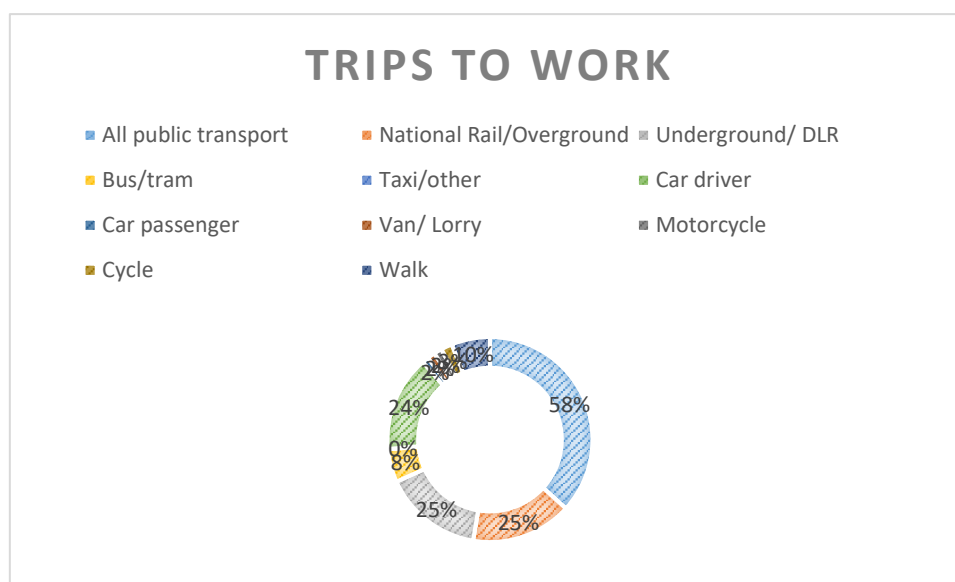
Changing the transport mix - Challenges and opportunities

Like many outer London boroughs, the private car retains a central role in meeting travel demand with around 43% of daily trips by car. Many of these are short trips that could be replaced by walking and cycling.

There are 78,497 cars in Merton or roughly one car per household. The highest car ownership is in Village Ward (1.4 cars per household) dropping to 0.7 car per household in the centre of the borough.

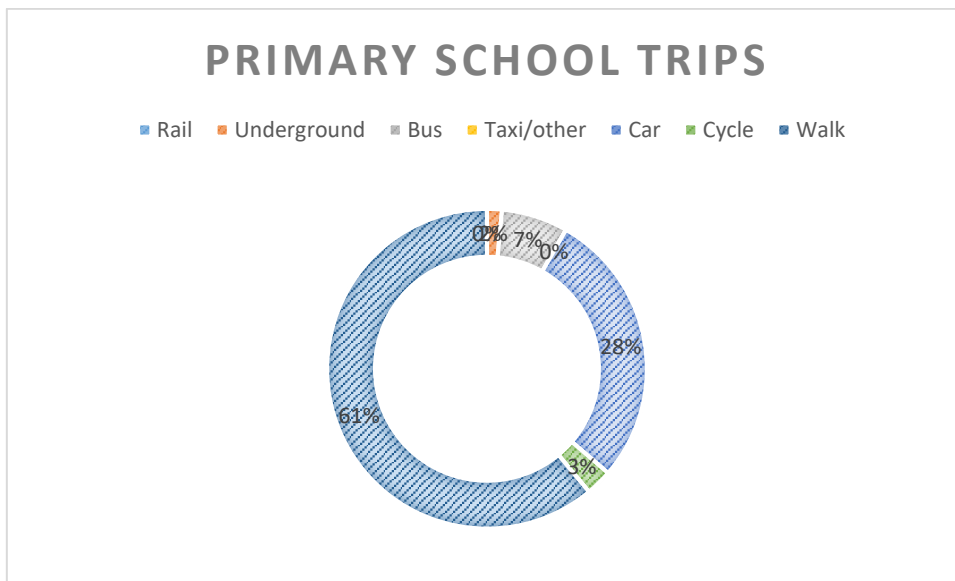
The areas with the highest car ownership generally coincide with areas of poor public transport connectivity. An average of 31.4% of households have no car.

Trips to work



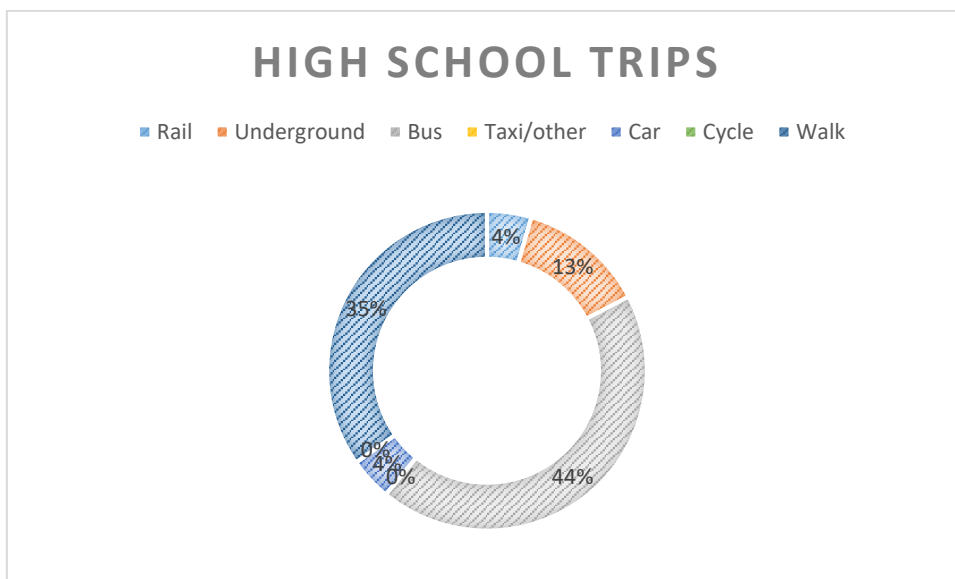
Trips to/from usual workplace, by mode and borough of residence, LTDS (weekdays only) 3 year average 2016/17-2018/19											
	All public transport	Rail	Tube DLR	Bus/ tram	Taxi/	Car driver	Car passenger	Van/ Lorry	Motorcycle	Cycle	Walk
Merton	58%	25%	25%	8%	0%	24%	2%	2%	2%	3%	10%

Trips to Primary Schools



Mode share of education trips by destination borough, ages 5 to 10							
	Rail	Underground	Bus	Taxi/other	Car	Cycle	Walk
Merton	0%	2%	7%	0%	28%	3%	61%

Trips to High Schools



Mode share of education trips by destination borough, ages 11 to 17							
	Rail	Underground	Bus	Taxi/other	Car	Cycle	Walk
Merton	4%	13%	44%	0%	4%	0%	35%

Working Principles

In context of Covid-19, key principles for our transport strategy response are:

1. Support vulnerable people

Large numbers of people identified as particularly vulnerable to Covid-19 require support. This is already happening as part of Project Shield, with deliveries of essential supplies being co-ordinated across the borough. The requirement for this is likely to continue for some time. Any changes to the kerbside or parking suspensions will need to consider the need for vehicle access for vulnerable households.

2. Support compliance with government guidance

'Lockdown' and social / physical distancing are the main tools currently available to reduce virus transmission. The need for social distancing is likely continue well into the recovery period or until such time as other tools become available such as vaccines.

3. Enable essential journeys to be made safely

Key workers still need to travel during the lockdown period. As restrictions ease, other groups are likely to travel for work and trip making will increase. Journeys both on public transport and by road need to be managed to ensure safety and to maintain low levels of private motor vehicle traffic.

4. Support the local economy

As restrictions ease and businesses re-open those that rely on footfall and face to face customer contact – markets for example – may find conditions particularly difficult. New options linking businesses and their customers may be required and bike based local delivery services may have a role to play.

5. Respond for now and plan for the medium and longer term

There are urgent actions that need to be taken, principally to support vulnerable people and protect public health by enabling social distancing and reducing road danger. Beyond this we need to consider how to manage the transport network as restrictions are eased and eventually lifted and then through the recovery period. We therefore need a phased approach to our highway response.

Phased Approach

A number of response phases are identified and considered appropriate in the context of Merton's transport strategy and covid-19.

	SHORT TERM	MEDIUM TERM	LONG TERM
	<i>Emergency</i>	<i>Recovery</i>	<i>Transformation</i>
High Streets and social distancing	Widen pavements in high footfall locations to support businesses reopening. This will involve reallocation of on-street parking bays.		
Commuting / Cycling	Create space for cyclists along key routes in the borough.	Plan with public transport providers, space to queue at rail and underground stations to support social distancing. Identify and fill gaps in Merton's cycle network and install temporary cycle priority schemes.	In supporting the modal shift to walking and cycling, seek to make permanent, wider footways and cycle lanes to achieve the objectives of the transport strategy
Low traffic neighbourhoods and School Streets	Support Schools with on-site social distancing measures.	Plan for pupils returning to school, promote measures for greater walking and cycling routes to schools.	Supporting modal shift and improving road safety through low traffic neighbourhoods

Priorities for funding concentrate on three key areas:

- Quickly building a strategic cycling network, using temporary materials and including new routes, to help reduce crowding on the Tube and trains and on busy bus routes
- Changing town centres so local journeys can be safely walked and cycled where possible, for example with wider pavements on high streets to give space for queues outside shops as people safely walk past while socially distancing
- Reducing traffic on residential streets, creating low-traffic corridors right across London so more people can walk and cycle as part of their daily routine

Some of the temporary changes we're making could become permanent in the longer term subject to funding.

Key interventions

Example measures include;

Reallocating road-space to widen footways



Temporary Cycle lanes



Modal Filters to reduce speeding and support low traffic neighbourhoods



The majority of Londoners support moves by local councils to give more space to pedestrians and cyclists, a poll was commissioned by Centre for London to explore Londoners' changing attitudes to travel during the crisis, and the potential impacts on the city's transport network once lockdown is over.

The survey found that:

Most London adults support new transport policies, including measures to support social distancing:

- 69 per cent of Londoners support the temporary widening of pavements to aid social distancing.
- 64 per cent of Londoners support the temporary provision of new cycle lanes, or wider existing cycle lanes, to aid social distancing.
- 59 per cent of Londoners support the temporary closure of roads and parking to accommodate walking, cycling and space for queues.

The majority also support permanent pavement widening, and the provision of new cycle lanes or wider cycle lanes, although support is lower than for temporary measures.

	Support for...	
	Doing this temporarily to aid social distancing	Doing this permanently
Widening of pavements	69 per cent	56 per cent
Provision of new cycle lanes, or wider existing cycle lanes	64 per cent	57 per cent

Community Participation and Engagement

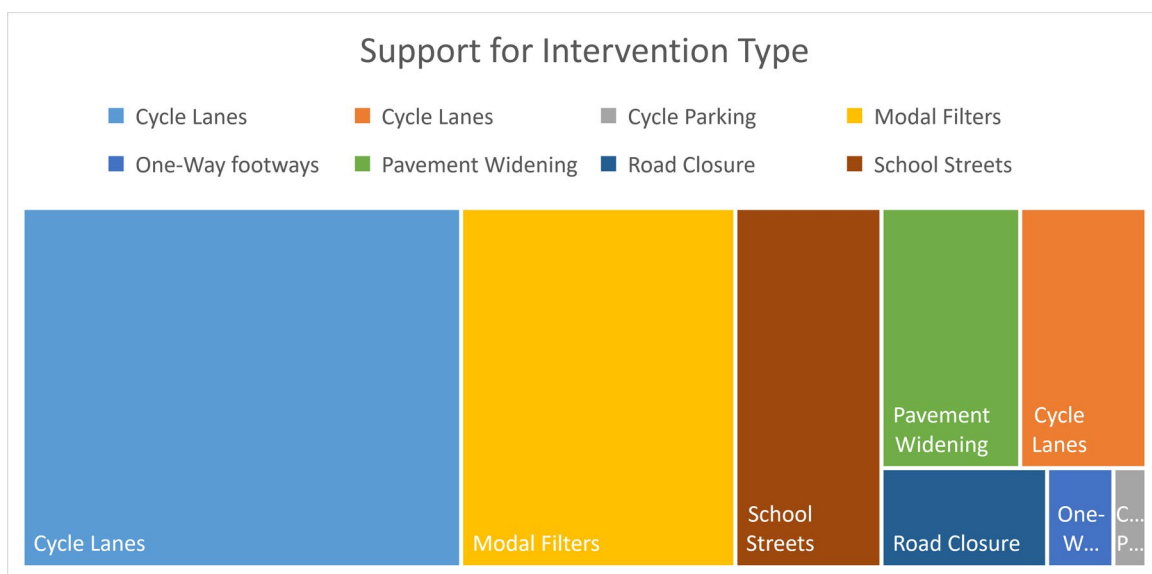
A draft of this plan was published online on 7th May 2020 and promoted via the Council's social media channels where the council invited comments and suggestions for locations where we could deliver changes to our streets.

Officers and councillors have held regular online with the Merton Residents Transport Group (newly formed to input to this issue) as well as key stakeholders such as Merton Cycling Campaign, local business groups, schools and the Sustainable Communities Transport Partnership.

Since the draft was first published, the council received over **100 representations** containing over **350 projects** and actions.

The greatest demand is for cycle lanes and low traffic neighbourhoods (modal filters) followed by school streets.

Officers have compiled the responses into a long-list of potential schemes (removing duplicates where the same idea was suggested multiple times). The long list is an Appendix of this report.



Going forward, the Council will use Commonplace, an online mapping and communication resource to map all the covid-19 related transport projects, engage with residents and offer updates on projects as they are delivered. This will be live by the end of June.

350 project suggestions in demonstrate the considerable appetite for change towards active travel; a lot of what has come forward dovetails with the borough's adopted transport strategy (LIP3).

The covid-19 transport plan is an emergency response. The community input received so far will help shape the funding bids that the Council is now preparing to both the Department for Transport and Transport for London. The Council cannot deliver everything, but will prioritise and deliver based on what funding is available.

To ensure the success of funding bids, the long-list of suggestions we have received will be prioritised in line with DFT and TFL funding guidance as well as data from TFL and Merton's LIP to prioritise projects with the greatest chance of attracting funding, and being successful in supporting a modal shift away from the car.

Data Driven Prioritisation

To fit with funding criteria, schemes need to be prioritised around developing:

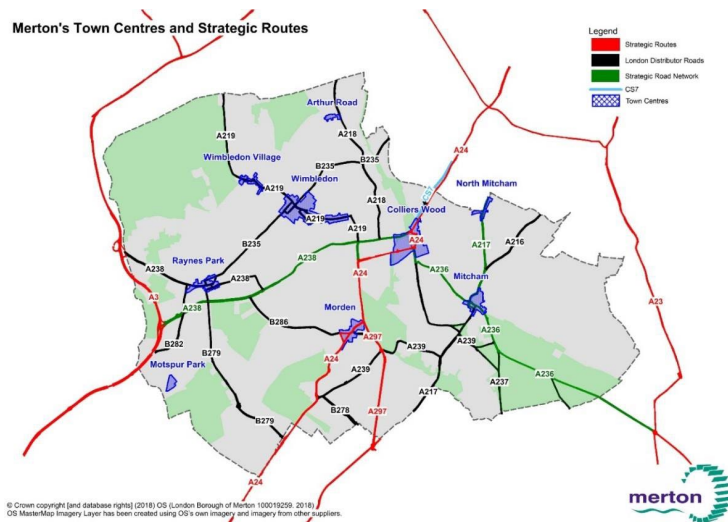
- Temporary cycle networks on strategic routes
- Social distancing at interchanges, stations and town centres
- Low Traffic Neighbourhoods and school streets

The maps and data below, from TFL and Merton's LIP highlight areas of Merton where strategic routes have already been identified and where there is greater propensity for people to cycle and support modal shift.

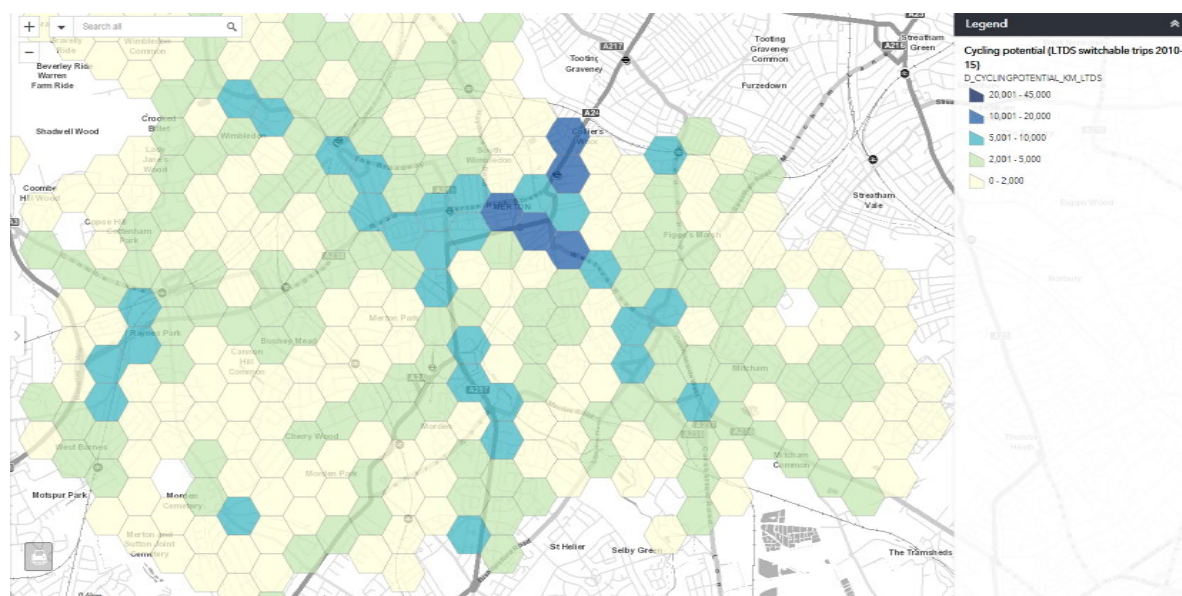
Cycling

At the moment approximately 20% of Merton residents live within 400m of the strategic cycle network. To meet the council's LIP target this would need to rise to 29% in 2021 and 50% by 4041. There are several TfL routes (cycleways) being delivered by Merton in collaboration with other boroughs:-

- Cycleway from Clapham Common to Wimbledon
- Cycleway from Colliers Wood to Sutton
- Cycleway from New Malden to Raynes Park



The areas of Merton with the greatest cycling potential are focussed on the main town centres and the corridors lining them, specifically Wimbledon, South Wimbledon, Colliers Wood, Mitcham and Morden.

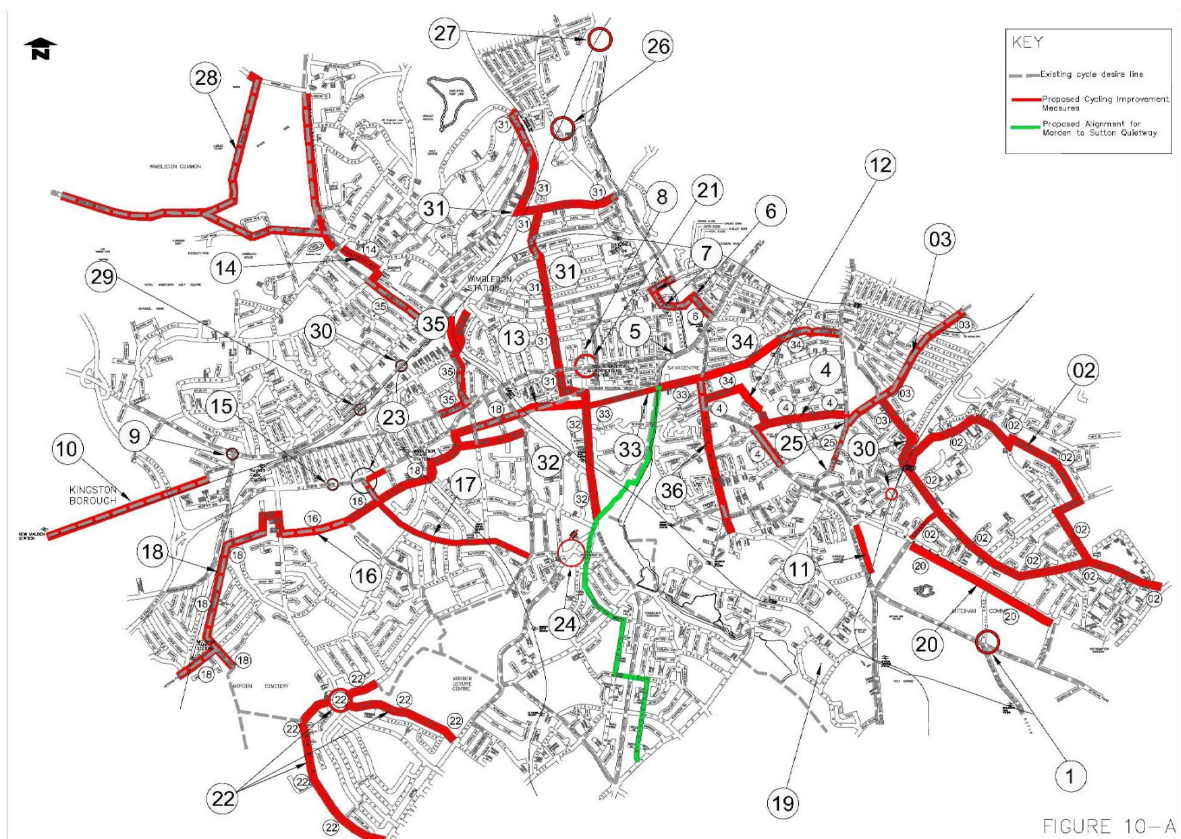


The areas marked in blue show the greatest potential for cycling, but also correlates with road accident data and where road users feel most vulnerable suggesting that these corridors are the priority areas for rethinking the highway layout to promote active travel.

To access as much funding as possible for the borough, our cycle bids will prioritise;

- Mitcham (London Road corridor, Tooting to Bishopsford Br)
- Mitcham (Western Road or Church Road to Colliers Wood)
- Colliers Wood (CS7 to Merantun Way and Morden)
- Morden (town centre to South Wimbledon)
- Merton High Street (and Kingston Road to Colliers Wood)
- Wimbledon town centre
- West Barnes to Raynes Park

The priorities listed above reflect a range of suggestions made by the community and build on the proposed cycle network within Merton's LIP Transport Strategy. These routes also correspond with TFL priorities set out in the Streetspace London guidance.



LIP: proposed cycle network for Merton

High Streets & Town Centres

The type of intervention required will be driven by the space available at the town centre or high street and expected demand for it as lockdown eases. The Council has identified the key priority to be in high footfall centres with a concentration of premises in high demand where queuing is likely to occur, principally outside food stores.

Wimbledon:

Wimbledon Broadway and Worple road are high priority areas for pavement widening as Wimbledon is the borough's major town centre with the highest footfall and most stores facing the street (Sainsbury's, Tesco Metro, M&S, Morrison's, Sainsbury's Local, Little Waitrose)

Pavement widening will be implemented where possible. Queens Road has space to accommodate queuing for Centre Court Shopping Centre; reducing crowding at the Broadway bus-stops.

Raynes Park:

Raynes Park hosts a local shopping offer with smaller stores and modest footfall. Each of these stores (Co-Op, Sainsbury's Local, Waitrose) have adequate space outside to manage queuing.

Mitcham:

Most of Mitcham's supermarkets have car parks that can accommodate queuing on-site (Asda, Lidl [x3], Iceland) Morrison's is located on a pedestrian and cycle street with no need to alter the footways. Parking bay suspensions will be applied to Fair Green East and West to reduce traffic and create more space for walking.

Morden:

Morden town centre has relatively wide pavements for Sainsbury's to manage queues and Lidl has a car park. Transport for London own and manage London Road. The Council is seeking clarity from TFL regarding the Underground / Bus Station interchange and need for pavement widening in this location.

Colliers Wood:

Colliers Wood's main shopping facilities are located in retail parks and stand-alone stores who can manage queues on-site (Aldi, M&S, Sainsbury's) Co-Op is located on the station plaza with room to social distance.

The council will consider small scale changes in local parades and local centres if the demand arises.

Low traffic neighbourhoods (LTNs) and school streets

During the lockdown period residents have been able to enjoy the benefits of lower traffic volumes on residential streets, using them for daily exercise by active travel means. Safe outdoor space to effectively socially distance will be essential to support health and wellbeing of people going forward. Low Traffic Neighbourhoods in the TFL Streetspace plan form a key part of this.

Low traffic neighbourhoods opens up the possibility of developing a local showcase to demonstrate to residents how on an everyday level the look and feel of their streets could be made over to provide a better and safer environment by applying the healthy streets principles. Measures to reduce through-traffic and speeding can be implemented through selective road closures and modal filters.

Temporary / experimental LTNs must offer safe, attractive environments for walking and cycling. At the very least this means 20mph speed limits and low traffic volumes for local access only. Merton is now a 20mph borough.

Key principles behind the location of temporary LTNs are to:

- Offer outdoor space that can be used more easily in locations of limited public and private green space
- Include school streets or zones of school streets, picking up on concerns about social distancing outside and routes to schools
- Focus on health and inequality outcomes
- Spaces and designs that reduce crime and anti-social behaviour
- Reduce road danger and prevent rat-running
- Link to the temporary and permanent cycle networks
- Be attractive and safe for everyone to use, including new and less confident cyclists and people using non-standard cycles, and encourage socially distanced walking
- Support the long-term delivery of the Mayor's Transport Strategy and Merton LIP3
- Include severance reduction measures on streets surrounding the LTN neighbourhood cell
- Consider accurate wayfinding around the LTN and to local destinations
- Provide temporary cycle parking to allow and consider schemes to improve access to cycles

Bus routes have a key function in enabling local access so must be protected as part of temporary LTN proposals, with a general presumption to bus routes and stop locations remaining as they are. Consideration may be given to bus gates to protect bus networks whilst removing general traffic.

There is a high demand across the west and south of the borough for Low Traffic Neighbourhoods. Some neighbourhoods in Mitcham, Colliers Wood and South Wimbledon already benefit from these measures.

Success of Low traffic neighbourhoods relied heavily on grassroots support at the local level, and an understanding of the benefits and impact on the remaining distributor road network. Merton Council supports the creation of low traffic neighbourhoods.

The roll-out will be dependent on the level of funding and focussed resident engagement over the medium-long term. Projects will require a neighbourhood level traffic assessment to determine suitability, though some measures are relatively simple to deliver on the ground.

We have outlined where we would like to see Low Traffic Neighbourhoods introduced and these will be further defined through consultation and by the level of funding granted by TFL.

At this stage, our funding bids for Low Traffic Neighbourhoods won't single-out specific streets or interventions until the assessments and designs have been concluded. We are aiming to submit bids for 10 Low Traffic Neighbourhoods across the borough. Based on resident feedback, the following areas will be considered:

- South Wimbledon
- Dundonald
- Haydon's Road
- West Barnes
- Cottenham Park
- Cannon Hill
- Lower Morden
- Pollards Hill
- Mitcham
- Merton Park

School Streets

Part of achieving Low Traffic Neighbourhoods is reducing the number of local journeys made by car. School trips are a large generator of this traffic which can easily switch to walking and cycling. The Council is supporting this through School Streets with part time road closures to discourage driving to schools.

As lockdown is eased, social distancing will remain, so we urgently need to prevent crowding outside school gates. It is likely that when schools reopen, start/finish times will be staggered and/or year groups will return incrementally. This will reduce the volume of students and parents outside the school gates at any one time. However, even with these strategies additional space will be needed to facilitate social distancing and to prevent the need for vulnerable road users being forced onto the carriageway with traffic.

School Streets create a safer and healthier environment by temporarily closing roads to traffic outside schools during drop-off and pick-up times. This enables more children to walk, cycle or scoot to school, with less air pollution, road danger and congestion.

As we emerge from lockdown, more children walking and cycling to school will help:

- maintain improved air quality
- protect the mental and physical health of children by enabling physical activity through travel (whilst other options for physical activity are limited)
- ease pressure on the public transport network, especially local bus routes – a key aim of the Mayor's Streetspace programme.

School Streets generally restrict traffic directly outside the school for 30-90 minutes at either end of the school day. Signs, barriers and/or cameras stop non-residents driving through the School Street. Residents and blue badge holders have access. Where needed, temporary barriers or bollards are placed on the street and raised/dropped by the school.

Without bollards, Automatic Number Plate Recognition (ANPR) or police support is used to enforce School Streets.

Key principles for School Streets

- School Streets should be considered outside of all primary schools. Where schools are located on main roads or public transport corridors, and it is not possible for School Streets measures to be introduced then alternative pavement widening may be required.
- Effective enforcement is necessary if School Streets are to have the desired impacts on traffic reduction and the creation of safe space for social distancing.
- Access should be maintained for residents living within the zone as well as blue badge holders.
- School Streets schemes are considered part of proposals for Low Traffic Neighbourhoods.

Assessment and delivery will have to be considered in tranches due to constrained resources.

Criteria for prioritisation includes:

- Where there are two or more schools in close proximity to one another.
- Schools with narrow footways.
- Schools with large intake/multi form entry, so that even with staggered start/finish times crowding outside is still likely.
- Where there was a recognised and significant problem with crowding outside school prior to the COVID-19 outbreak.
- Road danger was a recognised and significant issue prior to the COVID-19 outbreak.
- Plans are already progressing to deliver a School Street, and can be fast tracked

Merton is implementing a number of School Streets where specific issues have been identified involving either air quality, congestion or danger reduction. During September 2019, the Council introduced restricted access to support the following schools.

- Harris Primary Academy, Ivy Gardens, Mitcham
- St Thomas of Canterbury, Morden
- Links Primary School, Mitcham
- The Council has also been liaising with TfL to introduce restricted access to support Singlegate Primary School in South Gardens

We are engaging with schools to develop a programme of over 20 School Streets across the borough as the Council recognise this as a key priority cutting across many strategies. Implementation will be dependent on the level of funding received.

Analysis is already underway for the rapid roll out of School Streets at:

- Hillcross (Monkleigh Rd and Ashridge Way),
- Aragon (from Kingsbridge Rd to Aragon Place),
- Malmesbury (Newminster Rd and Malmesbury Road)
- Haselmere Primary (Haselmere Avenue by Brooklands Court)
- Merton Park (Church Lane).

Sites suggested through community engagement are:

- Russell Road
- Southey Road
- Wimbledon Park Primary
- All Saints Primary
- Bishop Gilpin
- Ricards Lodge
- St Matthews
- Gorringe Park Primary
- Poplar Primary
- Sherwood Park
- Beecholme
- Garfield Primary
- Date Valley Cricket Green
- Dundonald Primary
- Edge Hill

It is imperative that schools are consulted and decision making also the cabinet member for Children, Schools and Families.

Delivery

We are developing a programme of bids to submit to DFT and TFL to achieve the objectives set out in this plan. The number of projects delivered will be dependent on funding being available. At present, due to the financial position at TFL borough's no longer have TFL LIP resources that were available to deliver the Mayor's Transport Strategy.

Merton Council will fund and implement the first phase of priorities using exiting Highways budgets and we will be bidding for TFL for resources to deliver more significant high impact projects as part of the Mayor's Streetspace for London.

The level of funding from TFL will determine how many additional transport interventions we can deliver. We will also consider the use of Merton's Community Infrastructure Levy to respond quickly to the need to implement these schemes or enhance the benefits of externally funded projects. Further ideas and refinement of schemes will come forward from local residents and community groups, which we welcome and will consider as the interventions are rolled out.

Appendix A: Short Term schemes in delivery by Merton Council

Location	Measures	Implementation date
Ashcombe Rd bridge	One way for pedestrians Signs and road markings	4 June 2020
Wimbledon Bridge	Footway widening	5 June 2020
Haydons Rd bridge	Segregated cycle lane on both sides	8 th June 2020
Worple Rd o/s Elys Sainsburys	Footway widening	15 June 2020
Merton High street	Footway widening between properties 214 & 220	15 June 2020
Mitcham Fair Green	Footway Widening Parking suspensions	15 June 2020
Wimbledon Village	Queuing management / footway widening	26 June 2020
Arthur Rd o/s Co-Op	Queuing management & possible footway widening	6 July 2020
London Road, Mitcham	Better cycle lane / access provisions	July 2020
Merton High street between Haydons Rd and Colliers Wood CS7	Segregated Cycle lane	July 2020
Bushey Rd	Segregated Cycle lane	July 2020
Plough Lane	Segregated cycle lane Mandatory cycle lane	July 2020
Cycle parking	Secured and standard cycle parking throughout the borough as demand rises	July/August

Appendix B: Schemes prioritised for external funding bids

Cycling:

To access as much funding as possible for the borough, our cycle bids will prioritise;

- Mitcham (London Road corridor, Tooting to Bishopsford Br)
- Mitcham (Western Road or Church Road to Colliers Wood)
- Colliers Wood (CS7 to Merantun Way and Morden)
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Low Traffic Neighbourhoods

We are bidding for 10 Low Traffic Neighbourhoods across the borough. Based on resident feedback, the following areas will be considered;

- South Wimbledon
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School Streets

We will bid for 20 School Streets across the borough as the Council recognise this as a key priority cutting across many strategies. Implementation will be dependent on the level of funding received. Analysis is already underway for the rapid roll out of School Streets at:

- Hillcross (Monkleigh Rd and Ashridge Way),
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- St Matthews
- Gorringe Park Primary
- Poplar Primary
- Sherwood Park
- Beecholme
- Garfield Primary
- Date Valley Cricket Green
- Dundonald Primary
- Edge Hill

Appendix C: Extensive list of suggestions received through community engagement. Due to readability, the spreadsheet data will be available to download from the website.

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Merton's Active & Healthy Travel Response to Covid-19

Appendix B

Schemes in delivery by Merton Council

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Ashcombe Rd bridge	One way for pedestrians Signs and road markings	4 June 2020
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Merton's Active & Healthy Travel Response to Covid-19

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It is imperative that schools are consulted and decision making also the cabinet member for Children, Schools and Families.

Active and Healthy Travel Response to Covid.19

Location	Intervention	High Streets / Supporting Business	Commuting / Cycling	Low Traffic Neighbourhoods	School Streets	Neighbourhood
Kingston Road (Raynes Park)	Cycle Lanes		Y			Raynes Park
London Road (Tooting to Figges Marsh Jcn)	Cycle Lanes		Y			Mitcham
London Road (Figges Marsh to Fair Green)	Cycle Lanes		Y			Mitcham
London Road (Fair Green to Cricketers)	Cycle Lanes		Y			Mitcham
London Road (Cricketers to Tram)	Cycle Lanes		Y			Mitcham
London Road (Tram to Wandle Trail/ Bishopsford Br)	Cycle Lanes		Y			Mitcham
Haydens Road Bridge	Cycle Lanes					Wimbledon
Wimbledon Bridge	Cycle Lanes		Y			Wimbledon
Wimbledon Broadway	Cycle Lanes		Y			Wimbledon
Streatham Road	Cycle Lanes		Y			Mitcham
Western Road	Cycle Lanes		Y			Mitcham
Lower Downs Road / Kingston Road Jcn	Cycle Lanes		Y			Raynes Park
Merton High Street / S.Wimbledon Jcn	Cycle Lanes		Y			South Wimbledon
London Road (Morden Town Centre)	Cycle Lanes		Y			Morden
Chase-side Path	Cycle Lanes					Wimbledon Chase
Grand Drive	Cycle Lanes		Y			Morden
Hillcross Avenue	Cycle Lanes		Y			Morden
Grand Drive to Whatley Avenue	Cycle Lanes		Y			Morden
Grand Drive to Motspur Park	Cycle Lanes		Y			Motspur Park
New Malden Cycle Path to Coombe Lane	Cycle Lanes		Y			Raynes Park
Worple Road	Cycle Lanes		Y			Wimbledon
Green Lane	Cycle Lanes		Y			Morden
London Road (Morden to Sutton)	Cycle Lanes		Y			Morden
Morden Hall Park (resurface)	Cycle Lanes		Y			Morden
Morden Road (A24)	Cycle Lanes		Y			Morden
Coombe Lane / West Barnes Lane Jcn	Cycle Lanes		Y			Raynes Park
Colliers Wood High Street (CS7)	Cycle Lanes		Y			Colliers Wood
Garth Road to Joe Hood Rec	Cycle Lanes		Y			West Barnes
Plough Lane	Cycle Lanes		Y			Wimbledon Park
Commonside West / Three Kings	Cycle Lanes		Y			Mitcham
TFL A24 (Colliers Wood to Sutton)	Cycle Lanes		Y			Morden
London Road (Ravensbury)	Cycle Lanes		Y			Mitcham
Pollards Hill to Croydon Road	Cycle Lanes		Y			Mitcham
Plough Lane Roundabout	Cycle Lanes		Y			Wimbledon Park
Beverley Roundabout	Cycle Lanes		Y			Morden
Hartfield Road Gyratory	Cycle Lanes	Y	Y			Wimbledon
Wimbledon Hill Road	Cycle Lanes		Y			Wimbledon
Melrose Avenue	Cycle Lanes		Y			Wimbledon Park
Cricket Green	Cycle Lanes		Y	Y	Y	Mitcham
West Barnes Lane	Cycle Lanes		Y			West Barnes
Rigway	Cycle Lanes		Y			Wimbledon
Kingston Road (South Wimbledon - Chase)	Cycle Lanes	Y	Y			Wimbledon Chase
Causeway and Southside Common	Cycle Lanes		Y			Wimbledon Village
Martin Way to Rigway	Cycle Lanes		Y			Raynes Park
Parkside	Cycle Lanes		Y			Wimbledon
Phipps Bridge (Morden to Mitcham)	Cycle Lanes		Y			Mitcham
Wandle Trail Earlsfield Gap	Cycle Lanes		Y			Wimbledon Park
Morden Park	Cycle Lanes		Y			Morden
Queens Road	Cycle Lanes		Y			Wimbledon
Wandle Trail (resurface)	Cycle Lanes		Y			Colliers Wood
Priory Road	Cycle Lanes		Y			Colliers Wood
Christchurch Road	Cycle Lanes		Y			Colliers Wood
Mearantun Way	Cycle Lanes		Y			Colliers Wood
Church Road	Cycle Lanes		Y			Colliers Wood
Western Road	Cycle Lanes		Y			Colliers Wood
Bushey Road (resurface)	Cycle Lanes		Y			Raynes Park
Merton High Street to Colliers Wood	Cycle Lanes		Y			South Wimbledon
Prince Georges Field (resurface)	Cycle Lanes		Y			Raynes Park
Merton High Street / S.Wimbledon Jcn	Cycle Parking		Y			South Wimbledon
Kingswood Rd / Wilton Cres	Modal Filters			Y		Wimbledon
Dundonald	Modal Filters			Y		Raynes Park
Cottenham Park	Modal Filters			Y		Raynes Park
The Ministers	Modal Filters					South Wimbledon
Woodhayes Road	Modal Filters			Y		Wimbledon
Cannizaro Road	Modal Filters			Y		Wimbledon Village
Toynbee Road	Modal Filters			Y		Wimbledon Chase
Lower Downs Road	Modal Filters			Y		Raynes Park
Cambridge Road	Modal Filters			Y		Raynes Park
Lambton Road	Modal Filters			Y		Raynes Park
Queens Road	Modal Filters			Y		Wimbledon
Worple Road (Raynes Park)	Modal Filters			Y		Raynes Park
Woodside	Modal Filters		Y			Wimbledon
Home Park Road	Modal Filters			Y		Wimbledon Park
Dorset Road / Merton Park	Modal Filters			Y	Y	Morden
Crossway	Modal Filters			Y		Raynes Park
Linkway	Modal Filters			Y		Raynes Park
Fairway	Modal Filters			Y		Raynes Park
Linkway	Modal Filters			Y		Raynes Park
West Barnes Lane	Modal Filters			Y		West Barnes
The Downs	Modal Filters			Y		Wimbledon
Leafield Road	Modal Filters			Y		Morden
West Barnes Area	Modal Filters			Y		West Barnes
West Wimbledon	Modal Filters			Y		Raynes Park
Cannon Hill	Modal Filters			Y		Morden
Lower Morden	Modal Filters			Y		Morden
Wimbledon Chase	Modal Filters			Y		Wimbledon Chase
Dundonald	Modal Filters			Y		Wimbledon
High Path	Modal Filters			Y		South Wimbledon
Graveney	Modal Filters			Y		Mitcham
Ashcombe Road Bridge	One-Way footways		Y			Wimbledon
Durnsford Road Bridge	One-Way footways		Y			Wimbledon Park
Wimbledon Bridge	Pavement Widening	Y				Wimbledon
Worple Road	Pavement Widening	Y				Wimbledon
Village High Street (Bayley & Sage)	Pavement Widening	Y				Wimbledon Village
Arthur Road (Co-Op)	Pavement Widening	Y				Wimbledon Park
Rigway (Tesco)	Pavement Widening	Y				Wimbledon Village
Streatham Road (Tesco)	Pavement Widening	Y				Mitcham
London Road (Morden Town Centre)	Pavement Widening	Y				Morden
Fair Green Mitcham	Pavement Widening	Y				Mitcham
Commonside East	Pavement Widening	Y				Mitcham
Lake Road	Pavement Widening			Y	Y	Wimbledon
Church Road (Mitcham Cricket Green)	Pavement Widening		Y		Y	Mitcham
Village High Street (west spur)	Road Closure	Y		Y		Wimbledon Village

Lower Downs Road (tunnel)	Road Closure		Y	Y		Raynes Park
Raynes Park Town centre	Road Closure	Y				Raynes Park
Morden Town Centre (bus/cycleonly)	Road Closure	Y	Y			Morden
King George VI Ave	Road Closure					Mitcham
Russell Road	School Streets			Y	Y	South Wimbledon
Southey Road	School Streets			Y	Y	South Wimbledon
Wimbledon Park Primary	School Streets				Y	Wimbledon Park
All Saints Primary	School Streets				Y	South Wimbledon
Bishop Gilpin	School Streets				Y	Wimbledon
Ricards Lodge	School Streets				Y	Wimbledon
St Matthews	School Streets				Y	Raynes Park
Gorringe Park Primary	School Streets				Y	Mitcham
Poplar Primary	School Streets				Y	Morden
Sherwood Park	School Streets				Y	Mitcham
Beecholme	School Streets				Y	Mitcham
Garfield Pimary	School Streets				Y	South Wimbledon
Date Valley Cricket Green	School Streets				Y	Mitcham
Dundonald Primary	School Streets				Y	Wimbledon
Singlegate Primary	School Streets				Y	Colliers Wood
Edge Hill	School Streets				Y	Wimbledon

Committee: Cabinet

Date: 15 June 2020

Wards: all

Subject: Proposed submission of the draft South London Waste Plan

Lead officer: Director for Environment and Regeneration Chris Lee

Lead member: Cabinet Member for Regeneration, Environment and Housing, Councillor Martin Whelton.

Contact officers: Eben van der Westhuizen, planning policy, Future Merton
Tara Butler, Deputy Future Merton manager

Recommendations:

- A. That, having considered the recommendations from the Borough Plan Advisory Committee, Cabinet consider the contents of this report and resolve to recommend to Council, to submit the draft South London Waste Plan to the Secretary of State, understanding that this will be preceded by a statutory six-week pre-submission publication period.
 - B. That approval of any amendments arising during or subsequent to the Examination-in-Public be delegated to the Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Environment and Housing.
-

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. Following advice from the Borough Plan Advisory Committee on 12 September 2019, Cabinet (19 September 2019) approved the public consultation on the Submission Draft South London Waste Plan.
- 1.2. Between 31 October and 22 December 2019, the four partner boroughs, Merton, Kingston, Sutton and Croydon, consulted on the Issues and Preferred Options draft of the South London Waste Plan.
- 1.3. The document proposed eight draft planning policies and identified 46 existing waste sites across the four boroughs for safeguarding for waste treatment uses over the plan period to 2036. Specifically to Merton the new Plan proposes the removal of the Benedict Wharf site from waste management uses.
- 1.4. In total 78 representors made over 1,000 representations to the public consultation.
- 1.5. The purpose of this report is to seek Members' advice on the Submission draft South London Waste Plan (Appendix A, available online <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13>) and associated documents, including the Sustainability Appraisal (Appendix B <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13>), and a recommendation for Cabinet

and Council to give authority for the document to be published, representations to be sought and the plan to be submitted to the Secretary of State for Housing, Communities and Local Government.

1.6. At their meeting on 4th June 2020, the Borough Plan Advisory Committee considered the report and resolved to recommend to Cabinet that Cabinet agrees with the two recommendations A and B in this report.

1.7. The next stages of the Waste Plan's progress are:

Summer 2020	Publication of Submission version for public comment (6 weeks) across all four boroughs
Autumn 2020	Submission to Secretary of State
Early 2021	Examination in Public by Planning Inspector
Summer 2021	Adoption

1.8. Members should note that the submission of the Waste Plan to the Secretary of State will be accompanied by a schedule of proposed changes. This is common practice and covers minor changes including grammatical and factual errors and amendments arising from feedback to the 6-week publication. This report seeks the agreement of any schedule of minor amendments to be delegated to the Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Environment and Housing.

1.9. Should the planning inspectorate decide that the South London Waste Plan is 'sound' at examination, the final South London Waste Plan will be recommended to all four councils for adoption.

2 DETAILS

2.1. In 2012 the four boroughs of Merton, Kingston, Sutton and Croydon adopted the 10-year South London Waste Plan, for the plan period 2011-2021, which allocated sites, created planning policies and designated areas for waste management development. This existing South London Waste Plan will finish in 2021.

2.2. In 2019 the four boroughs agreed to work together again and produce a new South London Waste Plan to cover the geographical area of the London boroughs of Croydon, Kingston, Merton and Sutton.

2.3. The London Plan sets the boroughs the target of managing 100% of London's waste within Greater London by 2026 and having zero biodegradable and recyclable waste going to landfill by 2026. It also sets targets for local authority-collected waste, commercial and industrial waste, construction and demolition, and excavation waste.

2.4. Since the current South London Waste Plan was adopted in 2012, the four boroughs have been working closely together on:

- Monitoring the South London Waste Plan annually

- Fulfilling the legal Duty to Co-operate with other councils on waste management issues, responding to other Development Plan Documents for waste management.
 - Preparing and submitting a successful bid for government funding to support a new South London Waste Plan 2021-2036 on the basis of joint working.
- 2.5. In 2018 the four boroughs successfully bid for government funding (Planning Delivery Fund – Joint Working) for £136,594 to support the project.

Relationship with the South London Waste Partnership

- 2.6. Although the South London Boroughs already work together as the South London Waste Partnership and have a shared contract for the municipal collection and disposal of waste, the South London Waste Plan relates to the waste planning functions and responsibilities of the South London Boroughs as Waste Planning Authorities.
- 2.7. As a Development Plan Document, at a strategic level, the South London Waste Plan considers the local authority collected waste and the other forms of waste collected by private contractors, and accordingly safeguards sufficient sites to treat both the South London Waste Partnership's waste needs and that of other commercial waste operators.
- 2.8. At a more detailed level, the policies in the South London Waste Plan will be used to assess the merits of any planning application submitted by the South London Waste Partnership's contractor or any other commercial waste operator.

Draft South London Waste Plan: consultation on issues and preferred options

- 2.9. Between 31 October and 22 December 2019, the four councils consulted on a draft South London Waste Plan: issues and preferred options document. The document proposed eight draft planning policies and identified 46 existing waste sites across the four boroughs for safeguarding for waste treatment uses over the plan period to 2036.
- 2.10. Importantly, the document identified that the four boroughs could meet their targets for household, commercial and industrial waste by only safeguarding existing sites, but would permit appropriate intensification of waste treatment on these sites. The new Plan also proposed to meet the construction and demolition waste target by allowing the intensification of waste treatment for this waste stream on existing sites. This is different from the existing 2012 South London Waste Plan which supports waste management facilities locating within specific industrial areas (i.e. not just on existing waste sites as the new South London Waste Plan proposes). The principal headline from the 2019 consultation draft South London Waste Plan was to propose no new waste sites, although a replacement site for an existing site would be considered.
- 2.11. The consultation in Merton comprised:

- (i) contacting all those on the planning policy consultation database;
 - (ii) a dedicated webpage on the planning policy section of the Council's website with a link to the administrative lead authority, Sutton Council's consultation portal;
 - (iii) documents available at Council offices and libraries;
 - (iv) a notice in the Wimbledon Guardian;
 - (v) council tweets and Facebook posts; and
 - (vi) officers offering to attend community group meetings and responding to a request to present the proposals at an Abundance Wimbledon and Sustainable Merton 'Green Coffee' meeting.
- 2.12. The consultation methods described above, meet government's Regulation 18 requirements and the commitments in Merton's adopted Statement of Community Involvement (in place at the time of consultation) and new Statement of Community Involvement.
- 2.13. The consultation closed with a total of 78 individual representors making 1,155 representations..
- 2.14. The complete list of representations with officers' comments are set out in Appendix C, available online <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13> . If councillors would like to focus on Merton representations, these are:
- **C16** Merton Conservative Group
 - **C23** Wimbledon Park Residents' Association
 - **C70** a Merton resident (a one-word representation)
- 2.15. A summary of responses to the whole South London Waste Plan are set out in Table 1 below

Table 1: Summary of representations from the 2019 consultation

Representor	Comment	Officers' comment and actions
The Mayor of London	<p>Many matters supported but the plan is not in 'general conformity' with the London Plan and need to consider the following matters:</p> <ul style="list-style-type: none"> • Councils must remove their policy discouraging new sites for waste facilities because it does not allow better waste management (<i>reuse is preferred to recycling, which is preferred to other waste management</i>) or new technologies coming forward. • The flexible approach to the implementation of the waste hierarchy. • Waste sites which are not required by the boroughs should be offered to other London boroughs • No contingencies for plan not delivering 	<ul style="list-style-type: none"> • Officers intend to keep to the same approach because the councils can meet their waste targets through existing sites only and in south London, other businesses (i.e. not just waste management) have great demand for industrial uses, which the councils must also meet. • Wording regarding the treatment of waste in accordance with the 'waste hierarchy', have been amended • To ensure that London has the capacity to manage all the waste that it produces, the Mayor of London apportions target quantities of waste for each borough to manage. The councils' targets are already 13% above the waste the councils produce so the councils are already more than playing their part in meeting Greater London's waste. • A contingencies plan is accepted See 'Risks' below.
Councils outside London (notably, Surrey, Essex and Northants)	<ul style="list-style-type: none"> • The policies discouraging new sites for waste facilities because is too restrictive and the councils would not meet their targets 	<ul style="list-style-type: none"> • The South London Waste Plan area can meet its waste targets without the need for new waste sites. See 'Risks' below
Transport for London	Additions and clarifications	Accepted
Environment Agency	Additions and clarifications	Accepted
National Grid	Additions and clarifications	Accepted
Historic England	Additions and clarifications	Accepted

NHS England	Request for additional clinical waste facilities	Seeking further details from NHS England. Normally clinical waste disposal is within hospital settings. See 'Risks' below
Metropolitan Police Service	Additions and clarifications	Accepted
Thames Water	Support	Accepted
Viridor	Request for sufficient outdoor operating space	Reduced boundary of Beddington Farmlands Energy Recovery Facility
SUEZ	Request for 'Agent of Change' policy (ie: new development must mitigate effects from established uses)	Accepted
Veolia	Request for 'Agent of Change' policy (ie: new development must mitigate effects from established uses)	Accepted
Days Aggregates	Request for greater flexibility and correction that the site managed 168,000 tonnes per annum of Construction and Demolition waste	Accepted. This representation meant the shortfall for Construction and Demolition Waste target has been eliminated
Poppymill Ltd	Delete the Chessington Equestrian Centre site as it is temporary use	Accepted
Curley Skip Hire	Delete the Curley Skip Hire site because it is adjacent to residential uses	Accepted
Wandle Valley Forum	Additions and clarifications	Accepted
Residents	Numerous issues	See Appendix C

Submission Draft South London Waste Plan Document

- 2.16. In light of the consultation and other developments, the consultation document on issues and preferred options South London Waste Plan document has been revised to become the Submission Draft South London Waste Plan (see Appendix A). The major changes between the 2019 consultation and this proposed submission are:

- *Key Issue 3 - Scarcity of Land* has been updated to reflect the fact that the London Plan housing targets have been reduced and to provide more statistics on the demand for industrial land from non-waste industrial uses
- The *Vision and Objectives* have been tweaked to ensure consistency and alignment with amended policies.
- *Policy WP2 (Strategic Approach to Other Forms of Waste)* has been amended to reflect the move from a shortfall in the 2019 consultation draft, to the 2020 submission draft showing a small surplus in terms of meeting the construction and demolition waste target. In addition, to improve conformity with the London Plan and address the concerns of South East councils, separate text and policy details have been included for inert excavation waste, which is no longer grouped together with construction and demolition waste.
- *Policy WP6 (Sustainable Construction of Waste Facilities)* has been amended in response to the Environment Agency recommendation to include the option of a requirement for an 'Excellent' CEEQUAL rating, which may be more suitable for the assessment of the sustainability features of some waste management proposals, than a bespoke BREEAM assessment.
- *Policy WP8 (New Development Affecting Existing Sites)* is a new policy to reflect the requests from SUEZ and Veolia (see above). It sets out the London Plan "agent of change" principle of if new development (e.g. homes) wants to locate next to existing development (e.g. nightclubs, hospitals, waste sites) the new development should provide appropriate mitigation measures rather than the established uses. This principle is also part of national policy.
- *Policy WP10 (Monitoring and Contingencies)* is a new policy to meet statutory requirements for monitoring and the Mayor of London's request for contingencies, such as in instances when existing sites have been unable to be intensified or operations on sites cease or have long-term throughput reductions.
- *Site C2 (Croydon Car Spares, Croydon)* has been deleted because it is closed, it only contributed a minute amount to meeting the targets and was located adjacent to two residential properties
- *Site C3 (Curley Skip Hire, Croydon)* has been deleted because it contributed nothing to the targets and is adjacent to existing and proposed residential uses
- *Site C5 (Factory Lane Waste Transfer Station)* has been divided into three: C5A (Factory Lane Waste Transfer Station), C5B (Factory Lane Reuse and Recycling Centre) and C13 (Solo Wood Recycling) at the request of the site operators/owners
- *Site K1 (Chessington Equestrian Centre)* has been deleted because it is a temporary site which is closing soon
- Changes to the safeguarded sites in Sutton comprise boundary changes, references to overhead power lines and references to the need of a transport assessment including cumulative impacts

- Appendix 1 is new and is a table of indicators for monitoring the policies.
- Appendix 2 has been revised to show new waste throughput figures and to reflect the latest information from site owners as to which sites may be intensified

Risks

- 2.17. Conformity with the London Plan: Section 19 of the Planning and Compulsory Purchase Act (2004, as amended) requires Development Plan Documents to be in “general conformity” with the London Plan. The Mayor of London has written to the councils to say in some respects the plan is in conformity and in some aspects it is not in conformity, e.g., conforming with regards to the safeguarding of existing and the intensification of existing sites but not conforming with regards to the discouragement of new sites and the potential weak implementation of the waste hierarchy. Officers have made a number of amendments to the Submission Draft South London Waste Plan and consider that the plan is in general conformity but not necessarily in absolute conformity. Council officers will continue to liaise with GLA officers on these matters in an effort resolve any outstanding issues, where possible. It should be noted that it is the Planning Inspector at the Examination-in-Public who will make the judgement on whether the plan is in general conformity with the London Plan.
- 2.18. Objections from councils in the South East: Section 33A of the Planning and Compulsory Act (2004, as amended) requires the councils to co-operate with other local authorities where there are significant strategic, cross-boundary issues. Waste is defined as a strategic issue and the movement of waste is a cross-boundary issue. The councils’ have written to 43 authorities, of which some are representatives for a further 17 authorities, with whom a significant quantity of waste had been exchanged (sent and/or received) within the past 5 years. Only 4 authorities have raised matters that require further discussions on matters such as, facilities that have or will be closing and quantities of waste within unclear origin coding. Therefore, the South London Waste Plan boroughs need to come to an understanding with the South East authorities over the movement of waste. Officers continue to liaise with their colleagues in the South East authorities to conclude Statements of Common Ground with the relevant authorities.
- 2.19. Objection from NHS England: During the South London Waste Plan Issues and Preferred Options Document, the councils received a representation from NHS England requesting additional clinical waste treatment facilities in the plan area. To date, officers have followed up with NHS England but have not yet heard back from them on the nature and scale of the additional facilities requested and whether these are in addition to the clinical waste permits already held by hospitals and pharmacies in south London and so have not included a reference in the plan. Should NHS England make a further representation at the draft South London Waste Plan publication and representation stage, officers will consider the representation and if it

requires a minor amendment, with the delegated powers sought with the recommendations to this report, an amendment could be presented to the Planning Inspector during the Examination-in-Public.

3 ALTERNATIVE OPTIONS

- 3.1. There are no reasonable alternative options, as most of the processes being undertaken are specified by statutory requirements or by government policies (refer to Part 7 of the report).
- 3.2. Without an up-to-date South London Waste Plan, many more sites in Merton and across the three partner boroughs, would continue to be considered suitable for waste management facilities via the planning system. This would leave Merton Council with very limited planning scope to refuse inappropriate waste treatment planning applications or negotiate amendments to inappropriate proposals.
- 3.3. Another alternative is for each borough to produce a waste related development plan document independently, which would be far more resource intensive for each borough. The production of a 'sound' development plan document would in any case require neighbouring boroughs to collaborate in order to develop consistent policies and proposals in line with the legal requirement of "duty to co-operate". Furthermore, independent working may trigger a requirement to reimburse the government funding that has been awarded to this project, for 'joint working'.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. Between 31 October and 22 December 2019, the four partner boroughs, Merton, Kingston, Sutton and Croydon, consulted on the Issues and Preferred Options draft of the South London Waste Plan.
- 4.2. The next step is the publication of the Submission Draft South London Waste Plan, which the partner boroughs intend to submit to the Secretary of State later in 2020, after the approval by all four boroughs.
- 4.3. At their meeting on 4th June 2020, the Borough Plan Advisory Committee considered the report and resolved to recommend to Cabinet that Cabinet agrees with the two recommendations A and B in this report.
- 4.4. Before it is submitted to the Secretary of State, in line with legislation, the Submission Draft South London Waste Plan is published for six weeks. This is not a consultation in the traditional sense that each council wants to make more changes to the Plan; it is to allow anybody who still wants changes made to the Plan to submit these representations, which will then be passed to the Secretary of State's planning inspector for their consideration.
- 4.5. For the final South London Waste Plan to be legally compliant, the publication and seeking of representations must conform with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (SI 2012/767). Any objections to the draft plan must be made with reference to the "*Test of Soundness for Development Plan Documents*", set out in

Paragraph 35 of the National Planning Policy Framework and reproduced in Table 2.

Table 2: NPPF Tests of Soundness for Development Plan Documents

Test of Soundness	Definition
Positively Prepared	Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
Justified	An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
Effective	Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
Consistent with National Policy	Enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 4.6. The publication and seeking of representations will involve the following consultation methods to meet the Regulation 19 requirements and the commitments in Merton's adopted SCI and draft new SCI:
- a dedicated page on the council's website with a link to Sutton Council's consultation portal, the administrative lead authority where all the documents will be held;
 - documents on display at council offices and libraries;
 - emails / letters to consultees on the planning policy consultation database;
 - press release;
 - community meetings (if requested and probably virtual);
 - tweets and Facebook and posts.
- 4.7. Officers will also fulfil the legal Duty to Co-operate with other councils on waste management issues.

5 TIMETABLE

- 5.1. Following the approval by all four boroughs to publish the Submission Draft South London Waste Plan, there are a number of procedural steps that need to be followed before the plan can be adopted and these are set out in Table 3.

Table 3: Steps to adoption

Steps	Timescale (approximate)
Submission Draft South London Waste Plan published and representations sought	0 weeks
End of representations period	+6 weeks
Councils consider the representations received	+10 weeks
Submission to the Secretary of State	+10 weeks
Appointment of Planning Inspector	+12 weeks
Start of hearings for the Examination-in-Public	+20 weeks
End of hearings for the Examination-in-Public	+22 weeks
Main modifications (arising from the Examination-in-Public) consultation <i>(Note: This stage may not be required)</i>	+26 weeks
Issuing of the Inspector's Report	+34 weeks
If the Inspector's report finds the plan sound, officers recommend for adoption	+40 weeks
Adoption at Full Council	+44 weeks

5.2. The adoption of the South London Waste Plan is therefore still in accordance with the programme set out in the Local Development Scheme:

Summer 2020	Publication of Submission version
Autumn 2020	Submission to Secretary of State
Early 2021	Examination in Public Hearing
Summer 2021	Adoption

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. Funding to support this work will mainly come from existing resources and officers will seek opportunities for funding bids and match funding wherever possible.
- 6.2. In 2018, the four boroughs successfully bid for £136,594 from the Ministry of Housing, Communities and Local Government's Planning Delivery Fund for joint working to produce a new South London Waste Plan. This was supposed to be the first tranche of the Planning Delivery Fund but the fund has since been discontinued. Officers will now seek to produce the plan within the existing grant award.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. Waste treatment is a strategic planning issue across London and a challenge for all successful urban areas. As Waste Planning Authorities, all London Boroughs have a statutory duty to prepare a waste Development Plan Documents in line with Article 28 of the Waste Framework Directive (2008).
- 7.2. The National Planning Policy for Waste states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.
- 7.3. As waste planning authorities (WPAs), all four of the boroughs have a statutory duty to prepare a waste Development Plan Document in line with Article 28 of the Waste Framework Directive (2008).
- 7.4. With the aim of encouraging more local authorities to have a Development Plan Document in place, the Housing and Planning Act 2016, gives the Secretary of State greater powers to intervene in the Development Plan Document making process. Specifically it would allow the Secretary of State to intervene if a local authority was failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a Development Plan Document.
- 7.5. The proposals in this report and the process described to progress the South London Waste Plan, are in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the requirements set out in those regulations.
- 7.6. The requirement to send the Submission Draft South London Waste Plan to a Council meeting for approval to submit to the Secretary of State, arises from Regulation 3 of the Local Authorities (Committee System) (England) Regulations (SI 2012/1020)

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. Development Plans Documents contain planning policies to help improve community cohesion and are subject to Sustainability Appraisal / Strategic Environmental Assessments and Equalities Impact Assessments. These appraisals (refer to Appendix B which is available online <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13>) will be published alongside the draft plan for consultation.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. There are no crime and disorder implications arising from this report.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

10.1. As set out in the body of this report.

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix A – Submission Draft South London Waste Plan (available online via <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13>)
- Appendix B - Sustainability Appraisal (available online via <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13>)
- Appendix C - Representations on the South London Waste Plan Issues and Preferred Options Consultation (available online via <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan#titleCol13>)

12 BACKGROUND PAPERS

- 12.1. [South London Waste Plan 2011-2021](#)
- 12.2. [South London Waste Plan Issues and Preferred Options Document \(2019\)](#)
- 12.3. [Waste Framework Directive \(2008\)](#)
- 12.4. [Planning and Compulsory Purchase Act \(2004, as amended\)](#)
- 12.5. [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)
- 12.6. [National Planning Policy Framework](#)
- 12.7. [National Planning Policy for Waste](#)
- 12.8. [London Plan Intend to Publish \(2019\)](#)
- 12.9. [Merton's Statement of Community Involvement adopted \(2006\)](#)
- 12.10. [Merton's Statement of Community Involvement draft \(2019\)](#)
- 12.11. [Merton's Core Planning Strategy adopted \(2011\)](#)
- 12.12. [Merton's Site and Policies Plan adopted \(2014\)](#)
- 12.13. [Merton's Polices Map \(2014\)](#)
- 12.14. [Merton's Local Development Scheme adopted \(2019\)](#)

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Committee: Cabinet

Date: 15th June 2020

Wards: All

Subject: Adoption of Merton's Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD)

Lead officer: Director of Environment and Regeneration, Chris Lee

Lead member: Cabinet Member for Regeneration, Housing Transport, Councillor Martin Whelton

Contact officer: Future Merton: Strategic planner: Ann Maria Clarke

Future Merton: Flood Risk Management Engineer: Tom Sly

Recommendations:

- A. That, following the recommendation from Borough Planning Advisory Committee on 5th March 2020, Cabinet adopts Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document, known as the SUDS SPD.
- 1.1. This report recommends the adoption of planning guidance on sustainable drainage and the public realm.
 - 1.2. Merton Council and 15 other local authorities across England have worked with Robert Bray Associates and McCloy Consulting to produce a sustainable drainage guide. The Guide provides a new approach to the design and evaluation of sustainable drainage systems with easy to understand and practical information for all those involved with the development process.
 - 1.3. During July – August 2018 a six-week public consultation was held on the draft supplementary planning document
 - 1.4. Following feedback from the consultation some amendments were made to the SPD. These are:
 - To provide clarity and to highlight the importance of heritage assets in the contexts of SUDS following comments received from Historic England
 - Additional text to express the importance of SUDS from a water and Sewerage Company's perspective following comment received from Thames Water.
 - 1.5. The final documents and consultation statements are available online at <https://www.merton.gov.uk/streets-parking-transport/streets-and-pavements/surface-water-drainage-and-suds>
 - 1.6. At their meeting on 5th March 2020, the Borough Plan Advisory Committee resolved to recommend that Cabinet adopts the SUDS SPD.

2 DETAILS

- 2.1. As a Lead Local Flood Authority (LLFA), Merton Council is a statutory consultee for surface water drainage matters relating to decisions on planning applications for major development.
- 2.2. SUDS provide a way of managing rainwater by mimicking natural drainage and are a requirement for all new major developments. To ensure successful and affordable Sustainable Drainage Systems, they should be fully integrated from the start of the design process along with other aspects of development design.
- 2.3. The guide is for developers, architects, landscape architects or anyone who plans to build or redevelop (both residential and commercial) in Merton. It creates a shared vision of SUDS for all involved in the development process, enabling design and evaluation to meet agreed standards and ensuring that SUDS are maintainable now and in the future.
- 2.4. The SUDS SPD provides further detail and clarity to Local Plan policies regarding flood risk management.

Consultation

- 2.5. During the consultation, the council used different methods of public engagement to maximise public involvement and raise public awareness of the consultation.
 - A survey was conducted using Survey Monkey, the reason being it is a user friendly, recognisable and trusted. As well as Survey Monkey other consultation methods used for the consultation were:
 - Paper copies of the planning guidance and its supporting documents were made available at Merton's reference libraries
 - Dedicated webpage with copies of the guidance and supporting documents
 - Consultation details tweeted on Merton's Twitter account and information on the council's Facebook page by Merton's Communication team
 - Consultation information was placed on the council's website home page
 - Formal written consultation letters and emails sent to residents, businesses, residential groups/organisations, environmental stakeholders e.g. Environment Agency, Thames Water and other interested parties
- 2.6. At the close of the consultation 4 responses were received:
 - Historic England
 - Thames Water
 - Natural England
 - Wimbledon Society

- 2.7. A summary of the comments received, and the actions undertaken are contained within Appendix A consultation statements for SUDS SPD final documents are available online via www.merton.gov.uk/spg

3 ALTERNATIVE OPTIONS

- 3.1. The alternative option would be to not adopt the SPD, this alternative option is not recommended. The SPD provides guidance on implementing Local Plan policies and assists in determining planning applications.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. As set out within the body of the report.

5 TIMETABLE

- 5.1. N/A

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. The SPD interprets existing planning policies and apply to relevant planning applications in Merton and has been produced using existing resources.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. The SPD has been produced under the Town and Country Planning (Local Planning) (England) Regulations 2012 and considering the Flood and Water Management Act 2010.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. No implication. The SPD has been subject to a Strategic Environment Assessment (SEA) screening. The council is statutorily required to consult with three government environmental advisor bodies namely the Environment Agency, Historic England and Natural England. The council received comments from Natural England and the Environment Agency who supported the findings of the SEA screening.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. None, the council invited the Metropolitan Police Service to take part in the consultation; we received no comments.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

10.1. None

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Available online at:
- <https://www.merton.gov.uk/streets-parking-transport/streets-and-pavements/surface-water-drainage-and-suds#design>
- Available on request by contacting 020 8545 3837 or future.merton@merton.gov.uk

12 BACKGROUND PAPERS

- National Planning Policy Framework (NPPF) 2019
- London Plan 2016 and Intend to Publish London Plan 2019
- Merton's Sites and Policies Plan 2014
- Merton's Core Planning Strategy 2011
- Draft Local Plan 2019
- Consultation statement – Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD)
- The SPD has been informed by technical guidance produced by Environment Agency, the government's SUDS Non- standard Technical Standards, Association of SUDS Authorities and Construction Industry Research and Information Association (CIRIA) 2015 SUDS Manual.



Statement of Consultation for the Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD) February 2020

1 Introduction

- 1.1 This document sets out how the London Borough of Merton complied with the consultation requirements of Merton's Statement of Community Involvement (SCI) (2006) and the Regulations (The Town and Country Planning (Local Developments) (England) (Amended) Regulations 2012) for the Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD), known as the SUDS SPD.
- 1.2 Regulation 22 of the Town and Country Planning (Local Development) England) (Amended) Regulation 2012 requires local authorities to prepare a Statement of Consultation setting out:
- i. Which bodies and persons the local planning authority were invited to make representations under the Regulation
 - ii. How those bodies and persons were invited to make representations under either of those regulations
 - iii. A summary of the main issues raised by the representations made pursuant to either of those regulation, and
 - iv. How any representation made pursuant to either of those regulations have been taken into account

2 Merton's Statement of Consultation (SCI)

- 2.1 Merton's SCI was adopted in 2006 and describes how the community can be involved in the preparation of planning development documents. In 2019, the Council engaged with the public on the new SCI, this document is expected to be adopted in spring 2020. The SCI is part of Merton's ¹Local Plan and sets out the council's commitment to community involvement in planning. Its explains how Merton's local community, residents groups/association/organisations, stakeholders, and other interested parties can be involved in developing planning documents, by informing the council what they think of a plan/strategy, provide additional information and suggest changes to the a plan/strategy.
- 2.2 Some of the engagement tools set out in the SCI has changed since its adoption in 2006. For example the council now has a Facebook and Twitter pages which is used as an additional method of alerting communities to new press releases on a range of topics including council's consultations. Furthermore the council no longer has a dedicated community engagement officer for planning matters. However in spite of not having a dedicated officer, all officers are now involved in

¹ The Local Plan is a plan for the future development of the local area, drawn up by the Local Planning Authority. It guides decisions on whether or not planning applications can be granted. In law it is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004

plan making process actively take part in and conduct outreach engagements events with the local community and other interested parties. These changes are not considered to be significant changes to the principles of Merton's SCI.

2.3 This statement reports on:

- The engagement methods used during the Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD)
- The feedback receive
- The council's response following this feedback.

3 How we consulted – consultation methods

1.3 During the consultation the council used different methods of public engagement to maximise public involvement and raise public awareness of the consultation. A survey was conducted using Survey Monkey, the reason being it is a user friendly, recognisable and trusted. As well as Survey Monkey other consultation methods used for the consultation were:

- Paper copies of the planning guidance and its supporting documents were made available at Merton's reference libraries
- Posters displayed at Merton's at libraries
- Dedicated webpage with copies of the guidance and supporting documents
- Consultation details tweeted on Merton's Twitter account and information on the council's Facebook page by Merton's Communication team
- Consultation information was placed on the council's website home page
- Formal written consultation letters and emails sent to local residents, businesses, residential groups/organisations, environmental stake holders e.g. Environment Agency and other interested parties

4 Consultation responses

1.4 The following section gives a summary of the response received. All individual responses can be found on the council's website via web link. A total of 4 responses were received.

5 How the council considered the submitted responses

- 1.5 The council consider all responses received. In considering and deciding whether to take aboard comments and make changes the council had to consider the following:
- Is the proposed change in accordance with planning policy and guidance?
 - Would the proposed change exceed Merton’s Local Plan policies?
 - Is the comment in the context of the SPD and not related to other matters outside or not within the scope of the SPD for example submitted planning applications?

1.6 All comments received were assessed against the above and the appropriate changes to the SPD were made accordingly.

Figure 1: Responses received summary and Merton Council’s response

Company/Residents Group/Community Organisation	Comment received (extracts)	Merton Council response
The Wimbledon Society	<i>We consider that whilst a lengthy document may be necessary to cover all the intended guidance, there is a risk that the detail will overcome the message. Accordingly, we suggest that the final version incorporate a one-page summary at the beginning of the document for ease of reference and understanding with, of course, cross references to the detail that follows.</i>	We welcome the response from the Wimbledon Society. Due to the nature of the topic it would be difficult to provide a one page summary as the topic is huge and has many components to it. The first chapter of the document provides a less technical, read

		friendlier introduction to the subject of SUDS.
Historic England	<p>Generally supportive of the SPD but provided the following comments:</p> <p><i>The draft SPD could be more clearly indemnify the historic environment s as a factor affecting site conditions and highlight the SuDS design should be respond appropriately. We note that this is referred to in passing on page 59 of the document but we suggest that the SPD would be improved if this were incorporated into one of the design principles already outlined at the start of the document.</i></p> <p><i>For example, section 4 of the SPD relates to the multifunction nature of SuDS measures, one of these multifunctional benefits could be the potential, through the use of appropriately designed and detailed SuDS schemes, to improve or enhance the setting of heritage assets such as listed buildings or conservation areas. Equally it is important that the document acknowledges that historic building, for example, can be damaged by some types of flood mitigation measures or some types of standardised components and so often need a tailored approach.</i></p> <p><i>It is also recommended that the potential impacts upon the historic environment, as well as upon the wider character and appearance of an area, is recognised within the context of maintenance. The maintenance and management of SuDS systems will be pertinent if SuDS are to continue to provide positive impact for the historic environment</i></p>	We welcome the support of Historic England have incorporated Historic England' valuable comments and suggestions into the final SCI, where appropriate.

	<i>in the long term.</i>	
Thames Water	<p>Overall the guidance document is very good; easy to follow, very thorough and covers all SuDS types. However it seems to lack as much detail on rainwater harvesting as a means of surface water management (in comparison to the detail provided on other SuDS features which would be considered further down the drainage hierarchy, as per the London Plan). We recommend that the document provide more guidance on how to successfully install rainwater harvesting and demonstrate that it can be viable.</p> <p>Page 17 – Section 5.1 para 4: <i>The LPA/LLFA may choose to consult Thames Water, as a non-statutory consultee.</i></p> <p>Section 5.2 para 1: <i>Thames Water should be listed in this paragraph. E.g. “...the planner, LLFA, Thames Water and all other parties...”</i></p> <p>Page 25: <i>Would stress the importance of providing Concept Design at pre-app stage from a Thames Water perspective as it enables early discussion with us in terms of available capacity in the receiving sewer network (particularly combined sewers).</i></p> <p>Page 49 Section 7.5.1 para 3: <i>Would also include Thames Water in the paragraph ‘Constructive discussion between...’</i></p> <p><i>Suggest providing a link to Thames Water Pre-Development enquiry webpage here https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity</i></p> <p>Page 57 Section 8.0 para 1: <i>Include Thames Water in opening paragraph, as SuDS design may be dependent on receiving sewer capacity.</i></p> <p>Page 72 Section 9.3.3 bullet 5: <i>Separate bullet point for discharge consent to public sewer and expand bullet point by including info on connections process or by simply providing the below link to our webpage on connections</i></p>	<p>We welcome the support of Thames Water. We have taken on board Thames Water’s comments throughout the document and welcome their supportive words.</p> <p>We have:</p> <ul style="list-style-type: none"> • Replaced reference to sewer company with Thames Water, for consistency of approach • Included rainwater harvesting as a measure to reduce the demand on sewer capacity and clean water supply network. • Included encouraging words to support

	<p><i>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness</i></p> <p><i>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</i></p> <p><i>SUDS not only help to mitigate flooding, they can also help to:</i></p> <ul style="list-style-type: none"> <i>• improve water quality</i> <i>• provide opportunities for water efficiency</i> <i>• provide enhanced landscape and visual features</i> <i>• support wildlife and provide amenity and recreational benefits</i> <p><i>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></p>	<p>early consultation with Thames Water before planning applications, through the either the pre-planning process/conceptual design.</p> <p>We welcome the useful comments regarding Merton's new local plan and will continue to engage with Thames Water on the Local Plan.</p>
Natural England	Supportive of the SPD.	We welcome the support of Natural England - no changes required.

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Committee: Cabinet

Date: 15th June 2020

Wards: All

Subject: Adoption of Merton's Statement of Community Involvement (SCI) (planning)

Lead officer: Chris Lee, Director for Environment and Regeneration

Lead member: Councillor Martin Whelton, Cabinet Member for Regeneration, Housing and Transport.

Contact officer: Ann Maria Clarke, Strategic Planner: Future Merton

Recommendations:

That, following recommendation from the Borough Plan Advisory Panel (BPAC) on 5th March 2020:

- A. Cabinet adopts the Statement of Community Involvement (SCI).
-

1. Purpose of report and executive summary

- 1.1 Merton's Statement of Community Involvement (SCI) sets out how the Council will involve local people, local businesses, stakeholders and other interested parties when preparing development planning documents and submitted planning applications.
- 1.2 On the 5th March 2020, Merton's Borough Planning Advisory Committee (BPAC) resolved to recommend that Cabinet adopts Merton's Statement of Community Involvement.
- 1.3 In accordance with planning legislation, the draft SCI outlines:
 - How and when the Council will involve local communities, businesses, voluntary sector and other interested parties in the production of development planning documents for example Local Plans, supplementary planning documents, neighbourhood plans and on submitted planning applications.
 - The planning regulations and procedures.
 - How the Council will provide feedback to comments made during consultations.
 - The consultation methods to be used.
- 1.4 The consultation started on 28th October and closed on the 8th December 2019. A total of 31 response were received of which, 21 were from the online survey.

- 1.5 The following techniques were used to raise awareness of the consultation
- Notified all the names of individuals, groups and organisations held on the Local Plan database¹. These are made up of residents, businesses, faith, environmental, civil and community groups.
 - Consultation awareness messages on the Council's social media platforms such as Facebook and Twitter.
 - In addition, the Council placed adverts on Facebook.
 - iConsult alerts to residents and businesses signed up to the receive alerts (iConsult has circa 2000+ subscribers)
 - Dedicated webpage
 - Dedicated officer available to answer any questions by way of email, phone calls or invited to community groups/societies meetings.

Summary of responses received

- 1.6 Many responses welcomed a new SCI. During the public engagement two topic dominated the response received.
- Comments on the council's Design review panel
 - Representations on planning applications from individuals are no longer displayed in full on the council website.
- 1.7 The responses can be viewed on the Council's website and a summary of the public engagement can be found in the Consultation Statement (Appendix B).

Changes to the SCI

- 1.8 The following changes to the SCI were made considering the responses received.
- Providing clarity and additional information on engagement tools/accessible engagement for Disabled people
 - Highlight the Council's 'Get Involved' webpage and alerts
 - Providing further clarity and explanation on the Pre-application and planning application processed, Design Review Panel.

2 Alternative options

- 2.1 There are no reasonable alternatives to updating Merton's Statement of Community Involvement 2006 as Local Planning Authorities are statutorily required to produce an SCI to support the Local Plan.

3 Consultation undertaken or proposed

¹ If you'd like to be added to our Local Plan consultation database.
Email: future.merton@merton.gov.uk

3.1 As set out in the body of the report.

4 Timetable

4.1 On adoption the SCI will become a supporting document to Merton's Local Plan and will be made available to view on the Council's webpage and a reference copy at Merton's libraries upon its adoption.

5 Financial, resource and property implications

5.1 The costs of preparing SCI fall within existing council budgets.

6 Legal and statutory implications

6.1 This SCI has been produced under section 18 (1) of the Planning and Compulsory Purchase Act 2004, to prepare and maintain a SCI.

7 Human rights, equalities and community cohesion implications

7.1 An Equality and Diversity Impact Assessment was carried on during the production and adoption of the SCI.

8 Risk management and health and safety implications

8.1 None for the purposes of this report

9 Appendices – the following documents are to be published with this report and form part of the report

- Appendix A: Statement of Community Involvement (SCI)
- Appendix B: consultation statement on Merton's draft SCI

10 Background Papers – the following documents have been relied on in drawing up this report but do not form part of the report

- The Planning and Compulsory Purchase Act 2004 (as amended)
- The Localism Act 2011
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- The Town and Country Planning (Development Management Procedure) (England) Order 2010 and
- The National Planning Policy Framework (NPPF 2019)

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Statement of Community Involvement (SCI) January 2020

**Tracked version = amendments following consultation
(If adopted the red tracked changes will be removed)**



Reviewing the Statement of Community Involvement (SCI).

The SCI will be kept under reviewed and updated when necessary to reflect current practice and changes to consultation methods and planning legislation requirements.

The SCI itself does not create planning policy, amend existing or give further details on planning policies or regeneration projects.

General Data Protection Regulation (GDPR)

EU law on data protection and privacy for all individual citizens of the European Union and the European Economic Area. It also addresses the transfer of personal data outside the EU and EEA areas.

Merton Council handles all personal data received in line with its Privacy Policy, available at <https://www.merton.gov.uk/council-and-local-democracy/data-protection-and-freedom-of-information/policies>

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DRAFT

1. Introduction

- 1.1 Planning can help to shape how places, areas and spaces can look where people live, work and play. Therefore, it is essential that the local communities, businesses, key stakeholders, neighbouring boroughs and other interested parties have an opportunity to take part in this process.

2. What is the Statement of Community Involvement?

- 1.1.1.1 Merton's Statement of Community Involvement (SCI) sets out how the council will involve local people, local businesses, other key organisations and stakeholders when preparing planning policies documents and on submitted planning applications. All local planning authorities (the council) are required under section 18 (1) of the Planning and Compulsory Purchase Act 2004, to prepare and maintain a SCI.

3. Our approach to involving the local community in planning

- 1.2 We want to ensure local communities are better informed about planning, its role in shaping the development and growth in Merton. To achieve this we aim to follow these additional principles:

- Be transparent in the way planning decisions are carried out
- Be realistic about the opportunities for change in any consultation
- Promote the use of electronic methods of consultation including email and the council's website to make involvement easier, quicker and more cost effective
- Be clear and helpful in guiding people through the planning process
- Be inclusive in consultations so a broad range of views are heard from people living and working in the borough
- Be open about the constraints imposed by regulations and planning policies (national and regional)
- Seek views at the earliest possible stages and throughout the planning process.
- Give feedback to comments made during consultations
- Use consultation methods that are appropriate to the stage of the planning process and the issues being considered

4. Merton's SCI background

- 1.3 In 2006 Merton Council adopted its SCI. However since its adoption there have been a number of changes to planning legislation, planning guidance and technological advances such as social media, which have changed the way public consultations and engagements are carried out which means Merton's SCI (2006) requires updating.
- 1.4 In accordance with the relevant legislation this SCI sets out how, when and who will be consulted throughout the preparation of a development planning document such as a Local Plan and other statutory development planning documents for example Supplementary Planning Documents (SPDs) prepared by the council. Furthermore, it also sets out how the council will consult on planning applications.
- 1.5 In addition to legislative requirements of what should be included in an SCI, this document also sets out the principles for consultation/engagement on Neighbourhood Plans/planning¹. This SCI has been prepared in accordance with:
- The Planning and Compulsory Purchase Act 2004 (as amended)
 - The Localism Act 2011,
 - The Town and Country Planning (Local Planning) (England) Regulations 2012
 - The Town and Country Planning (Development Management Procedure) (England) Order 2010 and
 - The National Planning Policy Framework (NPPF 2019).

5. The benefits of involving the local community

- 1.6 Merton's local communities are those that are most likely affected by development in their local area and more importantly, know the most about their neighbourhood and how they would like it to grow and be shaped for the future. There are many benefits in involving local communities in the planning process for the council, these include:
- Benefiting from the detailed local knowledge and perspective of local people and community organisations/groups
 - Community commitment to the future development and growth of their area
 - Greater support for policies, strategies and decisions
 - Improving wellbeing and the environment (built and natural

¹ Neighbourhood planning is a right for communities introduced through the Localism Act 2011. Communities can shape development in their areas through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders <https://www.gov.uk/guidance/neighbourhood-planning--2>

environment) within Merton.

6. Accessible consultations and engagement

1.7 For consultations the following considerations should be considered when holding public consultation and/or events in Merton to ensure they are accessible. The points outlined below, should be considered when holding consultations/engagement whether held by applicants or the Council or neighbourhood planning forums or any other event in the context of planning process:

- Ensure venue(s) acoustic is good especially in large rooms (even without hearing aids it can be hard to hear due to echoing effects). The use of microphones and speaker should be considered not only for the host but, for the use of the audience also.
- The room proposed for the consultation should be sufficiently large enough to house the anticipated numbers of attendees.
- Building that is compliant to meet needs of disabled people and people with reduced mobility for example: with lift, ramps, accessible toilet, sensory sensitivity
- Time of meeting - consideration for those with caring responsibilities (e.g. school pickups and drop-offs), work patterns, safety (avoiding late night meetings)
- Signers for people who are either deaf or have impaired hearing
- Induction loops
- In a location with high footfall
- Accessible location that has good transport links
- Buildings located in a well-lit area if consultation is taking place at night
- Parking for disabled people
- If providing refreshments check dietary needs
- Always provide water
- Handouts and presentations in plain English and alternative formats such as braille.
- Ensure presentation slides do not have complicated backgrounds for those with visual impairments and dyslexia
- Use plain simple English language i.e. 'Plain English'² particularly when providing information about planning.
- Provide translated documents on request in accordance with the Ministry of Housing, Communities and Local Government – formerly the DCLG³): Guidance on translation into foreign languages



² <http://www.plainenglish.co.uk/>

³ www.parliament.uk/DCLG-guidance-on-Translation

- Provide documents that are available in other formats on request.
The main audio formats⁴ are:
 - audiotape
 - digital audio files, for example MP3 format
 - CD-ROM
 - CD
- Communicate consultation as widely as possible and ensure that consultation is advertised in specialist press targeted at groups and use social media where appropriate.

7. **Our approach to involving the local community in planning**

1.8 We want to ensure local communities are better informed about planning, its role in shaping the development and growth in Merton. To achieve this we aim to follow these additional principles:

- Be transparent in the way planning decisions are carried out
- Be realistic about the opportunities for change in any consultation
- Promote the use of electronic methods of consultation/involvement including email and the council's website to make involvement easier, quicker and more cost effective
- Be clear and helpful in guiding people through the planning process
- Be inclusive in consultations so a broad range of views are heard from people living and working in the borough
- Be open about the constraints imposed by regulations and planning policies (national and regional)
- Seek views at the earliest possible stages and throughout the planning process.
- Give feedback to comments made during consultations
- Use consultation methods that are appropriate to the stage of the planning process and the issues being considered

8. **Statutory development planning documents**

1.9 Planning in England is policy led and having local planning policies in place is important to ensure that the right development in Merton takes place.

1.10 Merton's Local Plan currently consists of the National Planning Policy Framework (NPPF), national Planning Policy Guidance (PPG), the London Plan and its supporting (for example Supplementary Planning Documents/guidance) and:

⁴ <https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats>

- **Core Planning Strategy (2011):** sets out Merton's strategic objectives of the planning framework for the borough. It brings together strategies relating to land use in an integrated manner to provide a long-term spatial vision and a means to deliver that vision.
- **Sites and Policies Plan (2014):** consist of **development policies and site allocations for future development in the borough** and proposals from other local plan documents, namely the Core Planning Strategy, the Site and Policies plan, South London Waste Plan.
- **Polices Map (2014):** contains policies to help the council to implement its Core Planning Strategy policies to ensure all proposed development reflects the spatial vision for the borough and provides detailed policy to guide planning decisions

1.11 The above documents will be replaced with a new Local Plan for Merton, which will be one document. The document will still consist of strategic and development policies and site designations for example for open space and development site allocations, as seen on the Policies Map. The new Local plan is expected to be adopted in 2021.

- **South London Waste Plan (2011) (also known as Joint Waste Development Plan Document).** Sets out the issues and objectives to be met in waste management for the next ten years. It is a joint Development Plan Document and covers the geographical area comprising the London Borough of Croydon, the Royal Borough of Kingston upon Thames, the London Borough of Merton and the London Borough of Sutton.

1.12 Merton and neighbouring boroughs (named above) will be producing a new South London Waste Plan, expected to be adopted in 2021⁵.

- **Estates Local Plan (2018):** sets out site specific development planning policies for three housing estate in the borough (this document is used in conjunction with other Local Plan documents)

1.13 The new Local Plan, together with new South London Waste Plan and the Estates Plan will be collectively known as Merton's Local Plan and collectively will determine all development proposals in Merton. **Merton's Local Plan can be viewed via:** <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan>

Who will we consult?

1.14 The Town and Country Planning (Local Planning) Regulations 2012⁶ set out the plan preparation process and minimum requirements for public

⁵ This is subject to change and depends on when the Examination in Public takes place v Planning Inspector reports for both documents the finding

⁶ <http://www.legislation.gov.uk/ukxi/2012/767/contents/made>

involvement (regulations 18 to 26). As a minimum the council must consult and invite representations (comments) with ‘*specific consultation bodies*’, ‘*general consultation bodies*’ and residents or other persons such as local businesses in the Local Planning Authority’s (LPA) area, namely Merton. A current list of specific and general consultees is provided in Appendix A.

Figure 1: Stages in the preparation of Development Plan Documents

Pre-production evidence gathering and stakeholder involvement	Research and evidence gathering to underpin the plan may involve consultation with relevant stakeholders
Public participation in the preparation of the plan (Regulation 18)	This is a widespread process which may involve more than one stage of consultation depending on the document and the nature and scale of issues involved. This is the key stage to get involved and shape the plan content. Formal consultations will run for a minimum of six weeks.
Publication and submission of plan to the government (Regulations 19, 20 and 21, 22)	We will consult on the ‘submission’ version of the plan for a minimum of six weeks. This stage is for parties to submit comments on the ‘soundness’ ⁷ of the plan prior to submission to the government. A summary of all the consultation, the main issues raised and how these were taken into account will be submitted alongside the plan to the government.
Examination of the plan by a Planning Inspector (Regulation 24)	Relevant consultees and those who made a representation at the <i>submission stage</i> will be notified of the examination. The examination includes consideration of the comments received during the previous stage and will involve public examination hearings. Those who responded may be invited to attend an examination hearing by the Inspector. The examination may result in the Inspector posing additional questions for the council and other bodies making representations. This information/correspondence will be made publically available.
Publication of the Inspector’s recommendations (Regulation 25)	Following the Examination the Inspector will publish a report which assesses the ‘ <i>soundness</i> ’ of the planning document. This report will contain the Inspector’s recommendations and any Modifications (if necessary) to the planning document. This report will be publicly available. If considered to be significant ‘material changes’ the Inspector can advise a further round of public consultation, usually for 6 weeks

⁷ The preparation of the document needs to be legally compliant. The inspector will test how ‘*sound*’ the document is by assessing relevant evidence from both the local planning authority and any formal written comments. The inspector will only take into account the comments made on the ‘published’ plan before it is formally submitted to the Secretary of State

How we will involve the community in preparing policies

- 1.15 The ways that we may choose to involve the community and stakeholders in the production of development planning documents are set out in figure 2 below. The methods we use at any particular stage will depend on and be informed by:

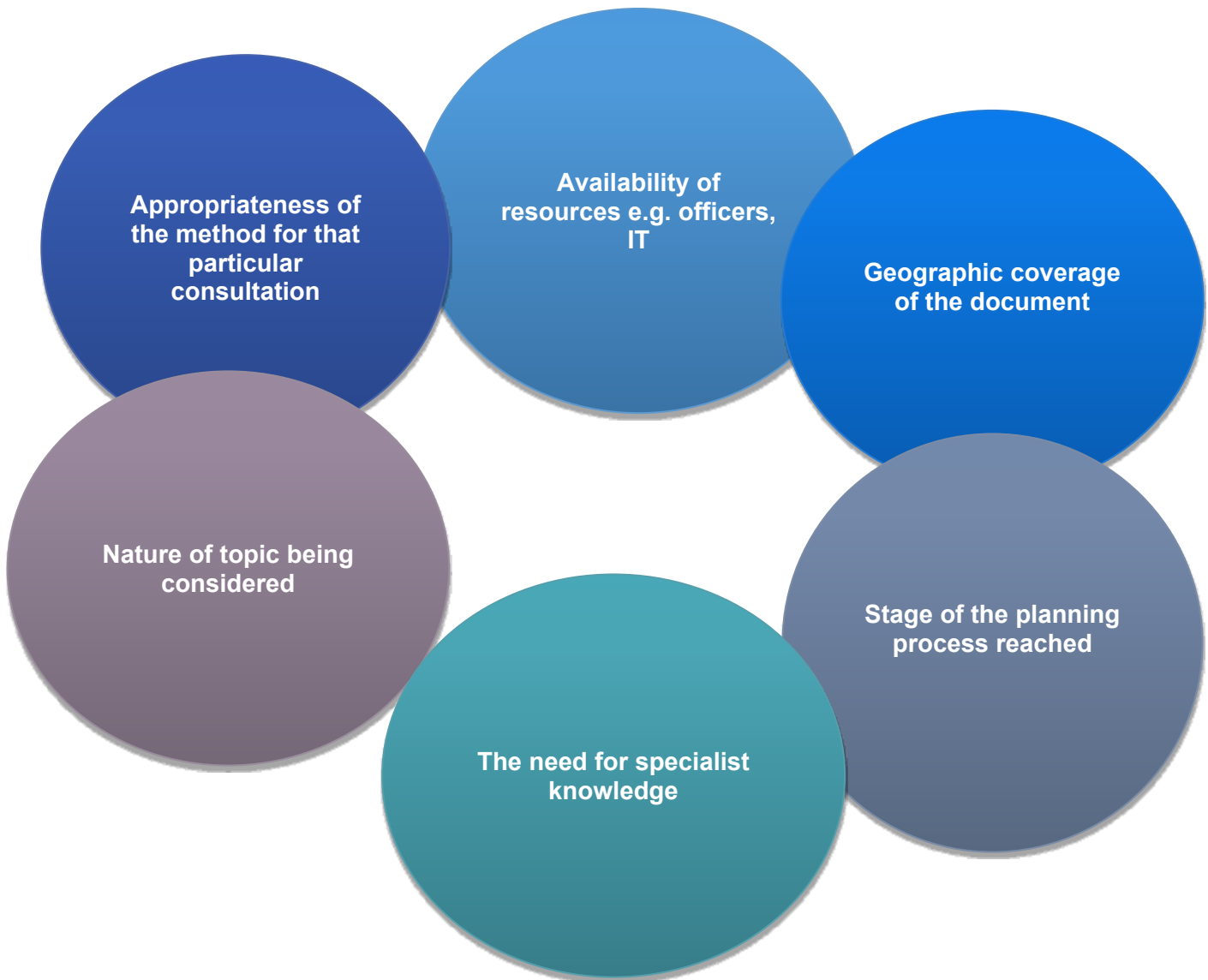


Figure 2: Consultation methods the council may use for planning documents

Website	All planning policy documents, consultations and supporting information will be available on our website. We may also use the website for online surveys, questionnaires and feedback or other consultation websites such as Survey Monkey
Get involve	Details of consultations will be added to Merton Council's 'Get involve consultation database. To get alerts please register at: https://www.merton.gov.uk/council-and-local-democracy/get-involved
Social Media	We may use social media such as the council's twitter or Facebook pages when appropriate e.g. to post updates or notify of consultation events and publications. Please note that use of social media will be for notification purposes only and not used for the receipt of consultation responses or used as a discussion forum.
Email	We will use emails as our main method of communication. Emails may include information on consultations, responses and the stage of preparation reached, adoption and general updates.
Local Plan database <i>(This database is maintained by Future Merton team and is solely used by the future Merton team for development planning document consultations.</i> <i>Any requested changes or removal of details held on the Local Plan database will only be applicable to this database only. Changes for other council teams must be reported to the relevant council team directly.</i>	We may email updates from this database to keep people updated on all relevant planning policy matters. The main method used for this will be the webpage. If you would like to be added to this Local Plan database or need to change contact details or wish to be removed from this database please email: future.merton@merton.gov.uk
Local Press	We may advertise certain consultations and stages of a plan preparation in the borough local press called The Wimbledon Times, which cover the whole of the borough. This will be determined by the council's statutory requirement to do so. These adverts/notices will let you know where more information can be found and how to get involved.
Meetings/ Community Forums	If we are invited we may meet with residents groups/organisations and other community groups relevant to the document being prepared.
Workshops	Workshops and facilitated events may be appropriate to discuss issues in detail and ensure that a range of people have a chance to express their concerns.
Targeted events	It may be necessary to arrange meetings with groups who

	<p>do not normally respond to planning policy consultations to make sure their views are heard.</p> <p>Children and young people The Council may engage with schools (with the agreement of the head teacher), Youth Parliament and youth groups.</p> <p>Ethnic Minorities This may be in partnership with community/community forums/religious/ethnic minority groups/associations or leaders.</p> <p>Disabled/Mental health This may be in partnership with voluntary organisations, charities, health professionals and other special interest groups.</p>
My Merton (Merton Council borough wide magazine).	We may advertise consultations for development planning documents in My Merton. This may not always be possible as this is a quarterly publication and publishing date times may not be the same as consultations timetables.

How we will use the results of consultation and engagement

- 1.16 When a consultation ends, we will consider the comments we have received and if necessary make changes, it must be noted that all changes following a consultation is required to be in conformity with national/ regional planning legislation, policies and guidance. We will also produce a Statement of Consultation report which will set out:
- Who was consulted?
 - How they were consulted
 - A summary of the main issues raised in the comments
 - Our response to the comments
 - How the comments have been considered.
- 1.17 This statement will be published on our website alongside the consultation documents in question.
- 1.18 All comments received for Local Plan and other planning policy and guidance consultations will be available to view on the Council's website with all personal details removed.

Supplementary Planning Documents (SPDs)

- 1.19 The Council may also produce other planning documents such as Supplementary Planning Documents (SPDs). They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. They do not have as much weight in decisions as development planning documents but do play an important role in giving more information and detail on how our Local Plan policies will be applied.

- 1.20 SPDs are not subject to a public examination with a planning inspector, as they are prepared by the council to give further details to adopted Local Plan policies.

Figure 3: Stages in the preparation of Supplementary Planning Documents (SPDs)

Development of evidence base and preparation of draft SPD	This may involve a range of different consultation and engagement activities depending on the topics and coverage of the SPD.
Public consultation on the draft supplementary planning document (Regulation 12 and 13)	This is the key stage to shape the content of the plan. Statutory minimum “ <i>being not less than 4 weeks period</i> ” for parties to submit representations
Adoption of the supplementary planning document by the Council (Regulation 14)	This is the final stage where the plan is formally adopted by Merton Council and an adoption statement is published.

Figure 4: Merton Council commitment for SPD consultations

Stage	Our commitment
Preparation	At this stage, we will publish on the council’s website the intention to produce an SPD and ask for comments from interested people or organisations. We may also arrange other events or workshops to discuss the content of the SPD. A consultation statement will be prepared, setting out who was involved in this stage, the comments they made, and how these comments were addressed.
Consultation	A completed draft of the SPD will be published for formal consultation. We will make available copies of all consultation material (including the consultation statement) on our website, reference libraries and Merton Civic Centre, as well as contacting the specific and (where appropriate) general consultation bodies (as set out in Appendix B). We will consult for at least weeks and a further consultation statement will be prepared after the consultation is finished.
Adoption	Upon adopting the SPD, we will prepare an adoption statement and make it, the SPD, and the consultation statement available at the Merton Civic Centre, on our website and at reference libraries.

Neighbourhood Planning

- 1.21 The Localism Act 2011 allows for the preparation of Neighbourhood Development Plans (often referred to simply as Neighbourhood Plans). A Neighbourhood Plan is prepared by the community through designated neighbourhood forums and sets out policies on development and use of land in the defined neighbourhood area. Neighbourhood planning is not a legal requirement but a right which, communities in England can choose to use.
- 1.22 Communities may decide that they could achieve the outcomes they want to see through other planning routes, such as incorporating their proposals for the neighbourhood into the Local Plan or through other

planning mechanisms such as Local Development Orders and SPDs or through pre-application consultation on development proposals.

- 1.23 Communities and local planning authorities should discuss the different choices communities have to achieve their ambitions for their neighbourhood. If brought forward by a community and when formally agreed by the council, the neighbourhood plan becomes a statutory planning document and must be taken into account when making decisions on planning applications in that neighbourhood. This means it has the same degree of weight in decision making as the Local Plan.
- 1.24 If the policies and proposals are to be implemented as the community intend, the neighbourhood plan must be deliverable. The National Planning Policy Framework (NPPF), requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.
- 1.25 The Neighbourhood Planning (General) Regulations 2012⁸ sets out the consultation requirements for neighbourhood planning, including the responsibilities of the local planning authority. The Council will undertake its statutory duty with respect to these regulations. The Council recommends that local people consider using the methods of community involvement set out in this SCI as the basis for their own sound and inclusive consultation on the preparation of their neighbourhood plan (including formation of the forum and neighbourhood area).
- 1.26 A Neighbourhood Plan become part of the Local Plan and the policies contained within them are then used in the determination of planning applications. The Ministry of Housing, Communities and Local Government (MHCLG) has made funding available to provide support and grants for communities looking to develop Neighbourhood Plans and Neighbourhood Development orders.

Figure 5: Stages in the preparation of Neighbourhood Plans

<p>Receipt of Neighbourhood Area / Neighbourhood Forum application (Regulation 6 and 9)</p>	<p>Merton Council shall consult for not less than six weeks, as soon as possible after receipt of a complete application. We will publish the applications on the website and bring the applications to the attention of people who live, work or carry on business in the area to which the application relates.</p>
<p>Publishing Designation of Neighbourhood Area and Neighbourhood Forum (Regulation 7 and 10)</p>	<p>If Merton Council approves the application, we will publicise the decision on the website and in such a manner to bring the designations to the attention of people who live, work or carry on business in the area to which the application relates. If refusing an area or forum application. The council will publish:</p>

⁸ <http://www.legislation.gov.uk/ukxi/2012/637/contents/made>

	<ul style="list-style-type: none"> • a decision statement setting out the reasons for refusal • details of where the decision may be inspected
Publicity by the Neighbourhood Forum of a Neighbourhood Development Plan prior to submitting to the Council <i>(Regulation 14)</i>	<p>The Neighbourhood Forum leads on this stage. Before submitting a Neighbourhood Development Plan to the council, the Neighbourhood Forum should:</p> <ul style="list-style-type: none"> • Consult for a minimum of six weeks. • Ensure that they bring the plan to the attention of people who live, work or carry on business in the area to which the plan relates. • Consult the consultation body listed in Appendix C, whose interest the Neighbourhood Forum consider may be affected by the NDP • Send a copy of the NDP to the LPA. The Neighbourhood Forum can determine how to consult at this stage, but they must draw up a Consultation Statement, setting out who and how they have consulted for the next stage of the process.
Following submission to the Council of the Neighbourhood Development Plan (NDP) <i>(Regulation 16)</i>	<p>Merton Council will:</p> <ul style="list-style-type: none"> • Consult for a minimum of six weeks • Publish the NDP on its website • Bring the NDP to the attention of people who live, work or carry on business in the area to which the plan relates. • Consult the consultation bodies referred to in the Neighbourhood Forum's Consultation Statement.
Publicising the Examiner's Report <i>(1990 Act schedule 4B para 12 (11 & 12) Regulations 18 and D & 19)</i>	<p>As soon as possible after considering the examiners recommendations and deciding to take forward a NDP the council must publish on the website and in such a manner to bring the report to the attention of people who live, work or carry on business in the area:</p> <ul style="list-style-type: none"> • The examiner's report. • Its decisions and reasons in response to the examiner's report in a 'decision statement'. <p>Merton Council will send a copy to the Neighbourhood Forum and anyone who asked to be notified of the decision.</p>
Referendum on the NDP	<p>Merton Council's responsibility to publicise the referendum in accordance with Neighbourhood Planning (Referendum) Regulations 2012 requirements.</p>
Publishing the NDP <i>*subject to more than 50% people voting in favour of the NDP Regulation 20).</i>	<p>As soon as possible after a successful referendum*, the council should publish the NDP, an adoption statement and notify any person that has asked to be notified that it has been made.</p>

Community Infrastructure Levy (CIL)

- 1.27 CIL is a levy charged on most new development in Merton which contributes some of the funding towards new infrastructure in the borough. The current CIL charging schedule was adopted in April 2014.
- 1.28 When adopting a new or revised CIL charging schedule, consultation requirements are similar to those for a Local Plan. The level of consultation will be commensurate with the type and scale of changes proposed. For changes, affecting many areas we will prepare a preliminary draft and undertake engagement on this; then prepare a final draft for which we will undertake the statutory consultation required.
- 1.29 As well as consulting with local resident representatives and organisations, we will take care to consult closely with local developers and infrastructure providers in preparing a CIL charging schedule with wholesale changes.
- 1.30 For a small change affecting a small number of potential sites a more targeted approach may be followed when consulting on draft proposals focusing on stakeholders of the respective sites, in accordance with statutory requirements. After consulting, an independent examination of the charging schedule will take place before adoption. Future details on [Merton's CIL can](http://www.merton.gov.uk/cil) be found on Merton's website www.merton.gov.uk/cil

9. Development Management

- 1.31 Development Management (formerly known as Development Control) is an integral part of the planning process. It puts development plans and policies into action to achieve sustainable development. Development Management includes the process by which planning applications (including applications for planning permission, listed building consent, advertisement consent and prior approval) are decided.
- 1.32 Development Management includes: pre-application engagement, which aims to shape development and deal with key planning issues well in advance of an application being submitted. Pre-application consultation is not mandatory, but is strongly encouraged. Early engagement leads to better development proposals and increases the likelihood of a proposal complying with the Local Plan.
- 1.33 The Council no longer accept any applications via post, except in exceptional circumstances.
- 1.34 All applications must be submitted through the [Planning Portal](#) website. The only exception being Prior Approvals which can be sent via email to prior.approvals@merton.gov.uk. The figure 6 below, sets out the stages a development proposal may go through in more detail (although this is indicative only and there will be exceptions to this standard pathway).

Figure 6: Stages of development proposals

<i>Pre-application stage</i>	The Council provides pre-applications advice to applicants on a proposed application on the request and fee submission of the applicant . Often including various options and simply seeking initial guidance.
	The applicant undertakes pre-application consultation with the local community and other relevant organisations depending on the characteristics of their site (e.g. the Environment Agency, Transport for London) . This is strongly encouraged for major and strategic applications (which includes residential applications with 10 or more dwellings or an area of 0.5 hectares or more; for other uses, those with over 1000m ² of floorspace or an overall area of 1 hectare or more). Applicants should ensure that pre-application consultation is advertised as widely as possible using different mediums (e.g. online, social media, notices in local libraries etc)
	Locally elected members (Councillors) may also have the opportunity to comment at this stage.
<i>Application stage</i>	The Council carries out statutory notification with the public and other stakeholders. This will always meet the minimum standards required by planning legislation and in some cases will be supplemented by additional consultation depending on the type of application.
	Development Management (DM) planning officers assess the application against planning policy (national, regional and local), considering the results of consultation.
	DM officers make recommendations on the application.

	A final decision is taken. Most applications are determined by senior planning officers. Larger applications and those where there is substantial public interest are decided by a Merton's Planning Application Committee (PAC) which is made up of elected councillors.
<i>Post application stage</i>	If planning permission (or a related consent) is granted, it may be subject to conditions requiring further details to be submitted and approved.
	Sometimes amendments to permissions are requested. This may involve submission of material or non-material amendments. Applications for material amendments and Reserved Matters (following grant of outline permission) will be subject to consultation similar to the application stage above.
	If permission is refused, the applicant may appeal to the Planning Inspectorate on behalf of the Secretary of State. The procedures for notifying the local community are set out in national regulations.

Pre- application discussion with applicant(s)

- 1.35 This stage of consultation is optional and there is no statutory requirement for applicants to consult before submitting an application. However, we believe it can be very useful in identifying issues, responding to concerns ~~and ensuring the views of those affected can help to improve the design of new development or influence the outcomes that will benefit the area.~~ Discussions are confidential and any advice given is without prejudice to future decisions of the Council. **The Council strongly encourages those who hope to bring forward applications for development on complicated or sensitive sites to consult with the council, the local community, community groups and other organisations relevant to the characteristics of their site or proposed development (e.g. the Environment Agency) at the pre-application stage. This is the stage at which local residents and other stakeholders can most influence the development of proposals. They are also consulted at a later stage, when a formal planning application is submitted, and can express their views on any scheme.**
- 1.36 Obtaining pre-application advice provides applicants with the following benefits:
- Understanding how the Council's policies will be applied to a proposal
 - Input from the design and conservation, planning policy, and transport and highways teams, Lead Local Flood Authority (LLFA), Public Health Merton and other departments/teams where considered necessary
 - Assisting in the preparation of proposals for formal submission, which, if the advice of planning officers is followed, should be handled more quickly and be more likely to result in a positive outcome
 - Helping to reduce the time spent in preparing the proposal
 - Indicating those proposals that are completely unacceptable and helping to improve the quality of the proposed development.

- Putting in place a Planning Performance Agreement where this would help with managing the process and agreeing any dedicated resources for progressing the application.

1.37 A properly conducted pre- application process may result in applications more likely to be recommended for approval. The Council strongly encourages those who hope to bring forward applications for development on complicated or sensitive sites to consult with the council and the local community at the pre-application stage.

1.38 The Council can advise developers on good practice for community engagement, including the length and extent of any consultation, contact details for potentially interested stakeholders in the local area, engagement methods and when the consultation should be held.

1.39 For such consultation to be meaningful, it should be held towards the beginning of the pre-application process, while there is still a realistic opportunity for the local community to help shape proposals before they are submitted as a formal application. If consultation is held just before submitting the application, the designs are likely to be more fixed and there are fewer opportunities for community engagement to influence the proposals.

1.40 Engagement methods that can be used include:

Merton's Design Review Panel (DRP):

~~The Design Review Panel⁹ is made up of a group of independent professionals such as architects, urban designers and other professional working in the built environment field.~~

1.41 **The Design Review Panel is set up and run by the Council to give independent professional design advice on development proposals where design is a key issue. The purpose of the DRP is to help improve design quality in the borough and the DRP advice aims to help applicants and decision makers to improve design quality in the borough.**

1.42 **The advice of the DRP is a material planning consideration, however the Panel is an advisory group and not a decision-making body. It is not a substitute for advice given by Council officers. The Panel is made up of professionals working in the built environment field who are appointed by the council based on expertise relevant to that proposed in the borough.**

1.43 **Development proposals are encouraged to be reviewed at pre-application stage to ensure more scope for influencing proposals. Pre-application reviews are held in private, but the public are allowed to attend as observers for proposals that have been submitted for planning permission.**

<https://www.merton.gov.uk/planning-and-buildings/regeneration-urban-design/design-review-panel>

- **Exhibitions, Community Forums and workshops:** organised by the

⁹ <https://www.designcouncil.org.uk/resources/guide/10-principles-design-review>

applicant to provide information about their proposals and an opportunity for feedback.

- **Letters, leaflets and questionnaires:** organised by the applicant, this involves sending a summary of the proposals and how to respond to properties which may be affected. This will focus on informing and getting the views of the properties most affected – this could be just a few streets, or whole neighbourhoods.
- **Dedicated website:** organised by the applicant and which could show the evolution of proposals and provide a facility for feedback to be recorded.
- **Presentation of the scheme to elected members:** organised by the Council including presentations to local ward councillors and Cabinet Members.

1.44 Consultations on very large schemes can be discussed at community forums, which are facilitated by council officers. The forums can enable local residents to express their concerns on a particular development proposals.

Consultation on Planning Applications

1.45 There are many different types of application, based on the proposed development. For each of these different types of application, there are also different requirements for the council to notify residents and to consult stakeholders.

1.46 Merton Council's website is the key resource for finding out information about and commenting on planning applications. Notification of planning applications will be publicised to meet statutory requirements. All applications will be available to view on the council's webpage [planning permission website page](#)

1.47 National legislation requires that council's allow a minimum of 21 days for any comments to be made on planning applications, with a few exceptions:

- The period is extended to 30 days for applications accompanied by an Environmental Statement made under the 2017 EIA Regulations
- Merton allows an extra 2 days to all notifications to cover any bank holidays
- Notification periods have to strike a balance between allowing enough time for comments to be made and ensuring decisions are made in a timely manner. Whatever the period, it is always helpful to receive comments as soon as possible.

1.48 ~~Consultations on planning applications will last at least 21 days, unless exceptional circumstances apply.~~ In the case of amendments to applications, consultation will last at least 14 days. In most cases, we will notify you through one or more of the following ways:

- A letter from Merton Council if you live close to the application site.

- A site notice near the application site – these will usually be attached to a lamppost or similar object. Notices will be displayed for a minimum of 21 days.
- A notice in a local newspaper.

1.49 The site notice, press notice or neighbour letter will explain where the planning application can be viewed, which will usually be on the Merton Council’s planning permission website and how to make comments.

1.50 There is no statutory requirement to consult on the following types of applications. **These applications are published on Merton’s planning explorer and receive their own unique application number.**

- Certificates of lawfulness of proposed use or development
- Certificates of lawfulness of existing use or development
- Internal alterations only to a Grade II listed building
- Advertisements
- Approval of details (exceptions are details for conservation area consents and external works to any listed building)
- Revisions to planning applications once valid
- Non-material amendments
- Discharge of conditions

1.51 Where required by legislation, in a Conservation Area the council will erect at least one site notice in a prominent location of the proposed development. Where the council is not required by legislation the council may ask developers to put up a site notice(s). In these circumstances, the council will provide a copy of the site notice.

1.52 The Council may require photographic evidence which shows a sign has been erected during and at the end of the consultation period. Information on site notices will be as clear and engaging as possible (while meeting statutory requirements); this may include larger font size to attract attention.

Figure 7: Development Management consultation methods

Type of application	Site notice by the council	Neighbour notification letter	Local newspaper notice	Website
House holder		√		√
Permitted development				√
Applications for major development as defined in Article 2 of the Development Management Procedure Order.	√		√	√

Applications subject to Environmental Impact Assessments (EIA) which are accompanied by an environmental statement.			√	√
Applications which do not accord with the development plan in force in the area	√			√
Applications which would affect a right of way to which Part 3a of the Wildlife and Countryside Act 1981 applies				√
Applications for planning permission not covered in the entries above e.g. non-major development.				√
Applications for listed building consent where works to the exterior of the building are proposed	√		√	√
Applications to vary or discharge conditions attached to a listed building consent, or conservation area consent or involving exterior works to a listed building.	√		√	√
Application to discharge conditions				√
Prior approvals		√		
Applications for Listed Building Consent				√
Advertisement Consent				√
Prior Approval telecommunications				√
Prior Approval larger household extensions		√		√

Applications for permission in principle				√
Applications for reserved matters after the granting of outline permission				√
Applications for variation or removal of planning conditions		√		√
Applications for minor material amendments				√
Applications for nonmaterial or technical amendments	By definition no consultation would be necessary			
Lawful development certificates	Legal determinations and by definition no consultation would be necessary			

How to comment on a planning application

- 1.53 Once a planning application has been validated¹⁰ by the Council, we are required to make a decision on the proposal within the statutory time limit unless a longer period is agreed in writing with the applicant.
- 1.54 The Council assigns a development management planning officer known as a 'case officer' to deal with the application until the point a planning decision is made by the planning committee. The case officer will do a site visit, check plans and make a recommendations based on:
- National Planning Policy Framework (NPPF) and its associated guidance the national Planning Policy Guidance (PPG).
 - The London Plan and its associated strategies
 - Merton's Local Plan (all documents that make up Merton's Local Plan)
 - Any representations received
- 1.55 The statutory time limits are usually 13 weeks for applications for major development and 8 weeks for all other types of development (unless an application is subject to an Environmental Impact Assessment (EIA), in which case a 16 week limit applies).
- 1.56 Where a planning application takes longer than the statutory period to decide and an extended period has not been agreed with the applicant, the government's policy is that the decision should be made within 26 weeks at most in order to comply with the 'planning guarantee'.
- 1.57 Comments must be made in writing via email or letter; verbal comments will not be accepted or considered by the Council. Postings on social

¹⁰ Once an application has been deemed valid and the determination process commences, the application is placed on the planning register and given an application reference number

media will also not be accepted. The Council does not accept anonymous or confidential comments related to planning applications and any anonymous or confidential comments received will not be considered when evaluating the planning application.

- 1.58 When making a decision, the council can only take account of certain issues that are legally allowed to influence planning applications; these are known as 'material considerations'.
- 1.59 The Council welcomes comments on planning applications on other aspects of an application, but to influence the planning process responders should try to consider and refer to these material considerations.
- 1.60 Material considerations include:
- Planning policies: including the NPPF, the London Plan, Merton's Local Plan and SPDs. This can also include emerging policy plans that have been through at least one round of public consultation.
 - Previous planning decisions: including appeal decisions
 - Loss of light or overshadowing
 - Loss of privacy or overlooking
 - Design, appearance and materials of a development
 - Layout and density of buildings
 - Traffic, highway safety and parking
 - Noise, smells and other disturbances resulting from the use of a new development
 - Loss of trees or other nature conservation effects
 - Effect on listed buildings or conservation areas
 - Capacity of physical infrastructure such as public drainage or water systems
 - Deficiencies in social facilities such as school places
 - Contaminated land
- 1.61 Merton Council cannot and will not, consider issues such as potential reduction in value of a property or of a private view but, the reason why these things might happen could potentially be material considerations.
- 1.62 All comments received on planning applications will be kept on file with the application.
- 1.63 All comments received from residents and other non-statutory consultees that relate to a planning application will be made available for viewing upon request to the Development Management team at Merton Civic Centre. All personal details will be removed by the Council in accordance with General Data Protection Regulations, apart from statutory consultees. All statutory consultee comments will be available to view on the Council's website with the relevant planning application.
- 1.64 All comments will be passed on to the relevant case officer for consideration. If you send an email then you will receive an automated acknowledgement. If you send a written representation then you will not receive a confirmation letter.

- 1.65 Case officers will not generally respond to individual letters or objections, but will address the key issues and comments in their recommendation report. While case officers will take into account all comments, they will use their judgement to reach a final recommendation informed by planning policies which, may not reflect your own comments on the application. Personal information such as telephone numbers and addresses will not be displayed. The case officer's report, will set out how the application was assessed and how comments received following consultation were taken into account in the report.

How a decision is made on planning applications

- 1.66 After the consultation on a planning application is finished, the case officer will write a report setting out their recommendation. A final decision will then be taken by either a senior planning officer under delegated authority or a Merton's [Planning Application Committee \(PAC\)](#). PAC is made up of Merton's elected councillors. If an application is due to be determined at the PAC, this means that its members will make the final decision directly, on a planning application.
- 1.67 Anyone who wishes to speak at the Planning Applications Committee, although slots are limited should contact the case officer in the first instance or email to: planning.representation@merton.gov.uk
- 1.68 Where an application has been amended the council will decide whether further publicity and consultation is necessary, taking into account the public interest in the initial application and the nature and scale of the amendment relative to the initial application.
- 1.69 Where re-consultation is necessary the council will set a timeframe for responses, balancing the need for consultees to be given time to consider the issue that is being re-consulted upon and respond against the need for efficient decision making. The consultation timeframe can vary from 10 days to three weeks: depending on the nature and scale of the amendment and application.

Planning Application Committee (PAC)

- 1.70 The PAC is open to the public and meets almost every month. It is the PAC members who are responsible in deciding whether to grant or refuse planning permission, not the case officer or planning officers. PAC members represent the interests of the whole community and must maintain an open mind when considering planning applications.
- 1.71 Where members take decisions on planning applications, they must do so in accordance with the planning policies (national, regional and local) unless, material considerations indicate otherwise. The meeting is recorded, and the recording is available to view on the council's website.

- 1.72 Members must only take into account material planning considerations, which can include public views where they relate to relevant planning matters. Local opposition or support for a proposal is not in itself a ground for refusing or granting planning permission, unless it is founded upon valid 'material' planning reasons.
- 1.73 Members of the public can speak at the PAC meeting either in favour or in opposition to an application but, to do so, you must contact Development Management team by 12 Noon on the day before the meeting. Further details can be found at: www.merton.gov.uk/attending&speakingatBPAC
- 1.74 The agendas, minutes and reports for the PAC are made available on the council website 5 to 7 working days before an upcoming committee and the minutes are published online within 5 to 7 working days of agreement at a subsequent committee.
- 1.75 Once a decision has been made, a decision letter is sent by email (or letter if email is not possible) to the applicant. All decision made by the PAC can be viewed on the council's website at: www.merton.gov.uk/environment/planning/planningdecisionlist
- 1.76 An application may be granted subject to conditions. Such conditions may require further reports to be submitted prior to commencement of works. There is no requirement to consult the public on planning conditions. Also demonstrating compliance with conditions is not an opportunity for public comment. However, should an applicant apply to the council to vary (change) a condition, then this may trigger the need for further public consultation.
- 1.77 All applications for certificates of lawfulness and tree work and most planning and advertisement applications are determined by the planning department. This is what is known as a 'Delegated' decision - one taken by officers of the council rather than elected councillors.

10. Where you can get more help

Planning handbook: A guide to planning in Merton

- 1.78 For more information our handbook provides an introduction to the planning system, advice about when you might need to apply for planning permission, the different types of application, and your options after a decision has been made.

www.planningguide.co.uk/merton

Planning Portal

- 1.79 The Planning Portal has a great, user-friendly, section dedicated to helping you understand if you need planning permission. The interactive house and interactive terrace are the major sources of information; but there are other, interactive, mini-guides on loft conversions, extensions, conservatories, outbuildings and porches.

www.planningportal.co.uk



Planning Aid Direct

- 1.80 Planning Aid Direct is a web resource operated by Planning Aid England (part of the Royal Town Planning Institute) which provides answers to questions people often ask about planning. It gives clear, simple explanations of how the planning system works. It also signposts you to further support and advice.

www.planningaid



Royal Town Planning Institute (RTPI)

- 1.81 The Royal Town Planning Institute is the principal body representing planning professionals in the United Kingdom and Ireland. It promotes and develops policy affecting planning and the built environment. Founded in 1914, the institute was granted a Royal Charter in 1959.



11. Principles of engagement

1.82 This section aims to assist developers who may need to engage and hold a public involvement/consultation with local residents/business/groups. The principles below are not an exhaustive list and should be used as a guide to assist. Developers are advised to have regard to section 6: *Accessible* consultations and engagement

Web accessibility

1.83 Merton Council expects that all webpage(s)/webpage(s) for example, for pre application consultations are accessible and comply with the industry Web Content Accessibility Guideline (known as WCAG 2.1)¹¹ and meet the design principals set within the WACG 2.1.

1.84 The WCAG 2.1 are an internationally recognised set of recommendations for improving web accessibility. It set out and explains how to make digital services, websites and apps accessible to everyone, including users with impairments to their:

- vision - like severely sight impaired (blind), sight impaired (partially sighted) or colour-blind people
- hearing - like people who are deaf or hard of hearing
- mobility - like those who find it difficult to use a mouse or keyboard
- thinking and understanding - like people with dyslexia, autism or learning difficulties

Raise awareness

- Research the communities who may be affected.
- When hold a consultation consider the timing and if possible, avoid public holidays/ religious dates - consider extending the consultation period if possible (planning legislation and regulation will need to be a consideration).
- Identify key individuals and groups who can spread the word such as religious/faith groups, environmental groups and disabled groups.
- Consider different levels of awareness raising depending on proximity and location.
- Explain what is proposed, how to find out more and why views are needed.
- Place adverts in public places for example community centres, libraries, in shop windows, bus stops, places of worship, GPs surgeries. Consider 'trade' journals, local publications.
- Consider developing an interactive website.

1.85 It is important during consultation to monitor responses and address weaknesses and issues as they happen if appropriate and/or possible.

¹¹ <https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag>

Building understanding

- Consider timing of the exhibition, public transport accessibility, language /style used. Identify whether there is a need to produce material in different languages, braille and a sign language interpreter.
- Explain the relationship with other consultations.
- Provide clear information about the project, background.
- Explain what is 'fixed', what is '*up for discussion*' and/or Identify options – be transparent.
- Consider providing a telephone hotline for those wanting more information
- Unstaffed/staffed exhibitions /drop in sessions
- Leaflets drops / Information sheets
- Dedicated and up to date website(s) and newsletters.

Consult and Communicate

- Consider establishing a residents / community steering group and work with them to identify locations for events and fine tune the content.
- Identify and connect with other community events e.g. community carnivals and festivals
- Consider holding staffed exhibitions. Interactive displays, where questions can be asked and answered
- Seek feedback and be clear what will happen to comments.
- Monitor attendance and consider additional venues / events to secure a balanced response from a board and representative community.
- Re-consult if significant changes have been made to the proposals.
- Consider using interactive websites to reach the 'silent' majority - then focus resources on the disadvantaged and hard to reach.
- Make questionnaires available for feedback and comments
- Offer presentations to local community groups/community forums/ward councilors.
- When appropriate consider requests for facilitated events Interactive websites

Discuss and Debate

- Level the playing field – facilitate the process to allow fair participation from all.
- Listen to views and share tensions between different communities.
- Invite new ideas and consider alternatives – provide responses.
- Focus sessions on key issues – capture local knowledge and ideas.
- Run visits to see similar developments elsewhere.
- Provide honest feedback and explain how comments have been included and if not, why not.
- Do what you say you will.
- Consider using independent mediators to find an agreed solution.
- Consider workshops with different groups (local residents and interest groups) to discuss development.
- Consider using and setting up a local focus groups

Effective Engagement

- Continue to support and involve groups which have contributed to the process.
- Invite feedback on issues before they develop into a crisis.
- Use engagement to inform decisions on issues such as traffic routing.
- Invite participants to share knowledge and experiences with similarly affected groups in the future, acts as mentors for others.
- Keep the website up to date with responsive key contact information. Provide electronic alerts at key stages.



Appendices

Appendix A: Types of applications and permissions

Full planning permission

Normally required if you wish to make a change in the use of land or buildings and or you wish to carry out works or operations including the erection of buildings/extensions.

It may also be required if development has been carried out without permission and an application is being made to regularise the position.

Outline planning permission

Applications for outline planning permission seek to establish whether the scale and nature of a proposed development would be acceptable to the local planning authority, before a fully detailed proposal is put forward.

This type of planning application allows fewer details about the proposal to be submitted. Once outline permission has been granted, you will need to ask for approval of the details (“reserved matters”) before work can start. These details will be the subject of a “reserved matters” application at a later stage.

An application for outline planning permission is normally only appropriate in the case of larger or more complex developments. It is not normally appropriate in the case of householder applications, developments in conservation areas, or changes in the use of premises.

Approval of Reserved Matters

Where outline permission has been granted, you may, within three years of the outline approval, make an application for the outstanding reserved matters, i.e. the information excluded from the initial outline planning application. This will typically include information about the layout, access, scale and appearance of the development. In October 2009, the Government introduced an application to extend the time limits for planning permission, including outline permissions.

Conservation area consent

Is required if you wish to demolish a building or structure within a conservation area.

Listed building consent

Normally required when you wish to carry out works to a listed building, this would include internal works to the building.

Advertisement consent

This is required if you wish to display advertisement including many types of shop fascia or signage. For more detailed guidance please check the central government leaflet about outdoor adverts and signs. www.gov.uk/government/advertisingguide

Tree work consent

Usually required to prune or fell a tree which is either within a conservation area or protected by a Tree Preservation Order (TPO). For more information on trees or tree applications, please telephone 020 8545 3815.

Certificate of Lawfulness for a Proposed Use or Development

Appropriate where you wish to seek formal confirmation from the council that proposed developments (including householder developments) fall within permitted development allowances or that a proposed use would constitute a lawful use of the premises and would not require planning permission.

Certificate of Lawfulness for an Existing Use or Development

Appropriate where you wish to regularise an existing use or development and can demonstrate that the use has been in operation for ten years, or a development (including householder extensions) in place for four years.

Appendix B: Duty to co-operate and Specific Consultees

Duty to Cooperate

The Town and Country Planning (Local Planning) (England) Regulations 2012 define the following bodies as 'specific consultation bodies':

The Environment Agency
Historic England
Natural England
The Mayor of London and the offices held by the Mayor
The Civil Aviation Authority
Clinical Commissioning Group (CCG)
NHS
The Office of Rail Regulation
Transport for London

The Coal Authority;
Network Rail Infrastructure Limited
Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3) (a) of the Communications Act 2003;
Any person who owns or controls electronic communications apparatus situated in any part of the area of the local authority;
Metropolitan Police Service

Other public bodies, in addition to local planning authorities, are subject to the duty to cooperate by being prescribed in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) as amended by the [National Treatment Agency \(Abolition\) and the Health and Social Care Act 2012 \(Consequential, Transitional and Saving Provisions\) Order 2013](#)

Specific consultation bodies¹²

¹² The Town and Country Planning (Local Planning) (England) Regulations 2012

Neighbouring boroughs
Mayor of London and Mayoral offices
The Coal Authority
The Environment Agency
Historic England (Historic Buildings and Monuments Commission for England)
Marine Management Organisation
Natural England
Secretary of State for Transport
Transport for London
Network Rail Infrastructure Limited
Highways England
NHS London / Clinical Commissioning Groups and Public Health departments in councils)
Utilities Companies (telecommunications, gas and electric companies operating in the Merton
Thames Water

General Consultation Bodies

The Government has defined through the Town and Country Planning (Local Planning) (England) Regulations 2012, General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and business interests.

Merton's Local Plan database contains over 2,000 groups, organisations, companies and individuals from the following categories:

- Non-adjoining Local Planning Authorities
- Advice and information groups
- Architects
- Black and Minority Ethnic Groups
- Business groups/organisations
- Civil Groups/organisations
- Conservation and heritage groups
- Developers
- Disability groups
- Education
- Elderly groups
- Emergency Services
- Employment/business groups/organisations
- Environmental groups
- Faith and worship groups
- Equality groups and forums
- Health organisations including NHS, CCG and Public Health
- House builders
- Landowners
- Merton Youth Parliament
- Planning consultants
- Police and other emergency services
- Political parties
- Regeneration groups and partnerships
- Registered social landlords
- Resident's groups/organisations
- Sport and leisure groups
- Statutory consultees
- Transport groups
- Utility companies
- Ward Councillors
- Youth Groups

To be added to the Local Plan database and be informed about the progress of planning policy documents and help shape them.

Please send your details to:

Email: future.merton@merton.gov.uk or

Post: Future Merton, Merton Civic Centre,
London Road, Morden SM4 5DX

Appendix C: Consultees for Neighbourhood Development Plans

In accordance with the Neighbourhood Planning Regulations 2012, the consultation bodies that the Neighbourhood Forum and Council have to consult at the relevant consultation stages are the:

- Mayor of London (and offices held by the Mayor of London)
- A relevant authority, any part of whose area is in or adjoins the area of the local authority, such as:
 - local planning authority
 - a county council
 - a parish council
 - a police authority
- Coal Authority
- Homes and Communities Agency (responsibilities now fall under the GLA)
- Natural England
- Environment Agency
- Historic England
- Network Rail Infrastructure Limited
- Highways England (outside London)
- Any person to whom the electronic communications code applies, or who owns or controls electronic communications apparatus situated in any part of the area of the LPA

- Where it exercises functions in any part of the neighbourhood area:
 - Clinical Commissioning Group (CCG)
 - Licensee under the Electricity Act 1989
 - Licensee of the Gas Act 1986
 - sewerage undertaker
 - water undertaker

- Voluntary bodies whose activities benefit all or part of the neighbourhood area
- Bodies representing the interests of different racial, ethnic or national groups in the neighbourhood area
- Bodies representing the interests of different religious groups in the neighbourhood area
- Bodies representing the interests of disabled people in the neighbourhood area

The Neighbourhood Forum is required to submit a Consultation Statement to the council formally submitting the Neighbourhood Development Plan. This statement must detail the bodies consulted in the preparation stage.

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Consultation statement on the draft
Statement of Community Involvement
(SCI) public engagement (28th October -
8th December 2019)

1. Introduction

- 1.1 On the 15 October 2019 [Cabinet](#) that Merton's 2006 SCI be revised and approved a six week consultation on the draft Statement of Community Involvement. The consultation started on 28th October and closed on the 8th December 2019. We received a total of 31 response of which 21 were received via our online survey.

2. Engagement methods

- 1.2 This section looks at the consultation and how the Council raised awareness of the consultation.

Raise awareness

- 1.3 The Council notified all the names of individuals, groups and organisations held on the Local Plan database¹. These are made up of local residents, businesses, faith, environmental, civil and community groups. The names on this database are person who have indicated they wish to be consulted on planning development documents in accordance with General Data Protection Regulation (GDPR).
- 1.4 During the consultation the Council ran consultation awareness messages on Merton Council social media platforms such as Facebook and Twitter. In addition the Council placed adverts on Facebook. Residents/business who are signed up to the council's iConsult 'get involved' consultation platform also received notification of the consultation. The database has over 2000+ subscribers.

Building understanding, consult and communicate

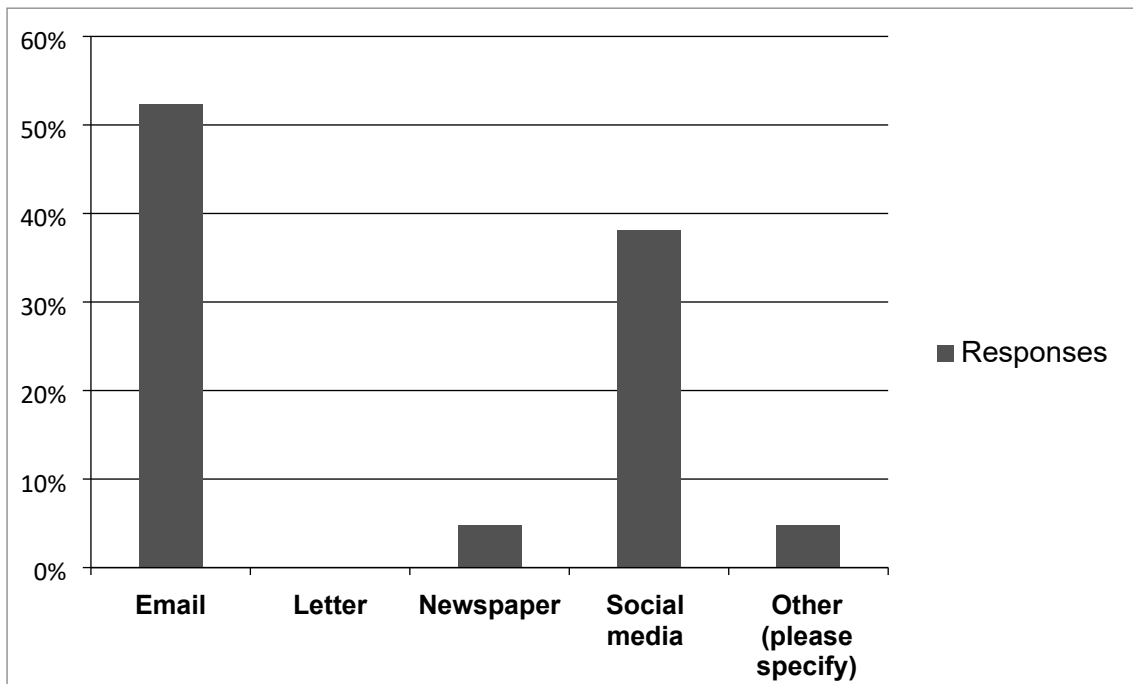
- 1.5 We had a dedicated [webpage for the draft SCI document and consultation](#). Officers were available to attend community groups/association meeting and forums. However, we did not receive any invitations or request to address such meetings.
- 1.6 Merton Councillors were briefed by way of Merton's democratic process of the SCI, its role within the context of planning and it importance to our local residents and local business. A dedicated Council officer was available to answer any questions on the document and consultation.

3. The online survey analysis of responses

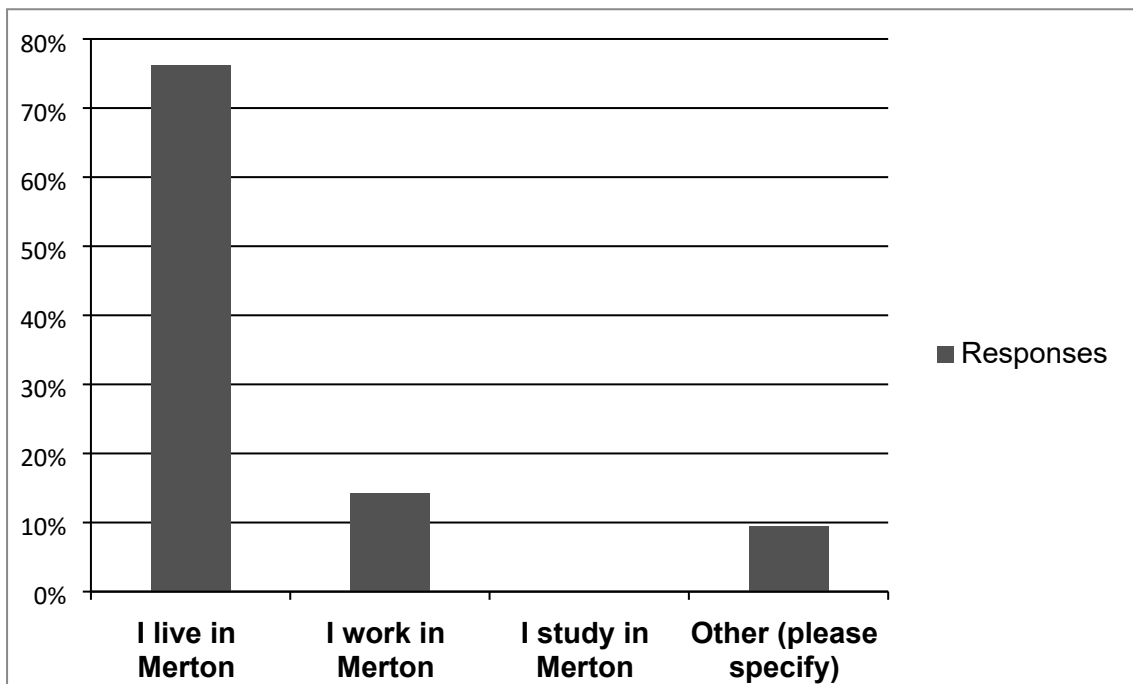
- 1.7 The following section looks at the 21 online response via Survey Monkey portal. We used this survey portal as it is easy to use on a number of platforms such as mobile, tablets and it is a trusted portal.

¹ If you'd like to be added to our Local Plan consultation database.
Email: future.merton@merton.gov.uk

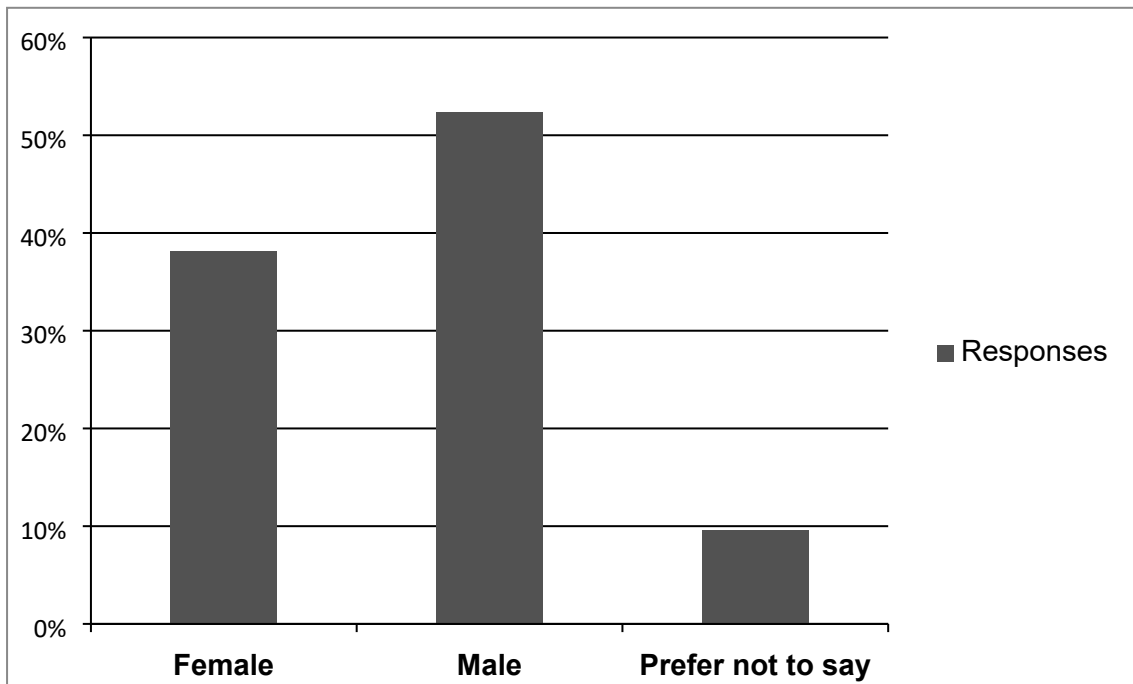
Q1. How did you hear about the consultation?



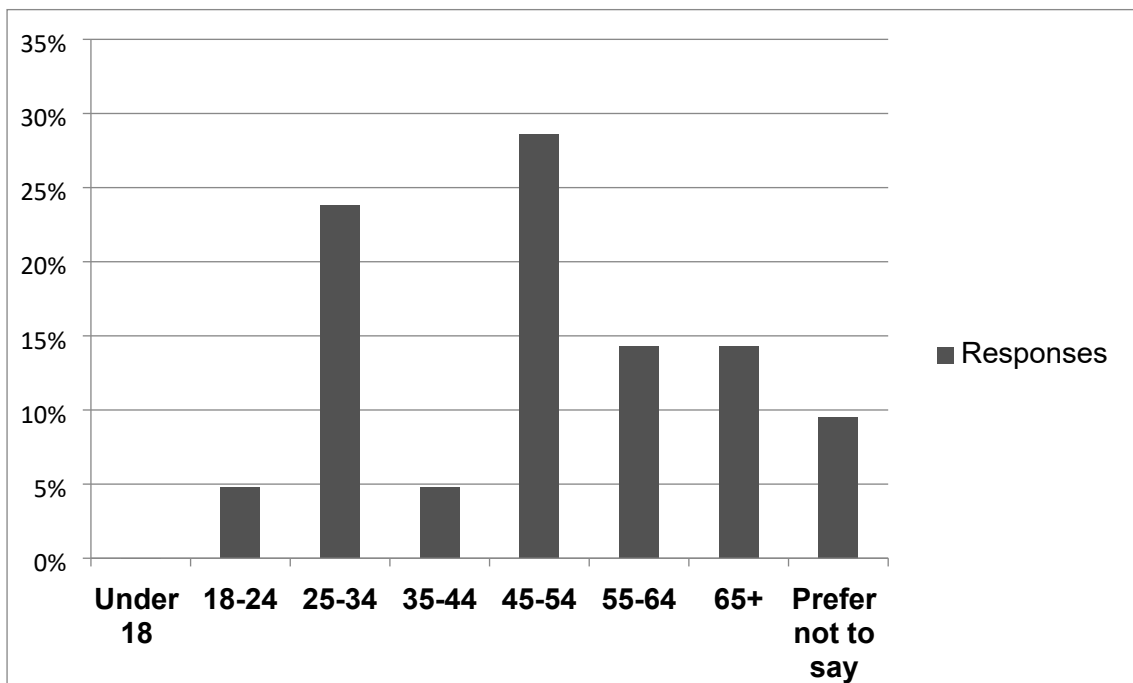
Q2. What is your relationship to the borough of Merton?



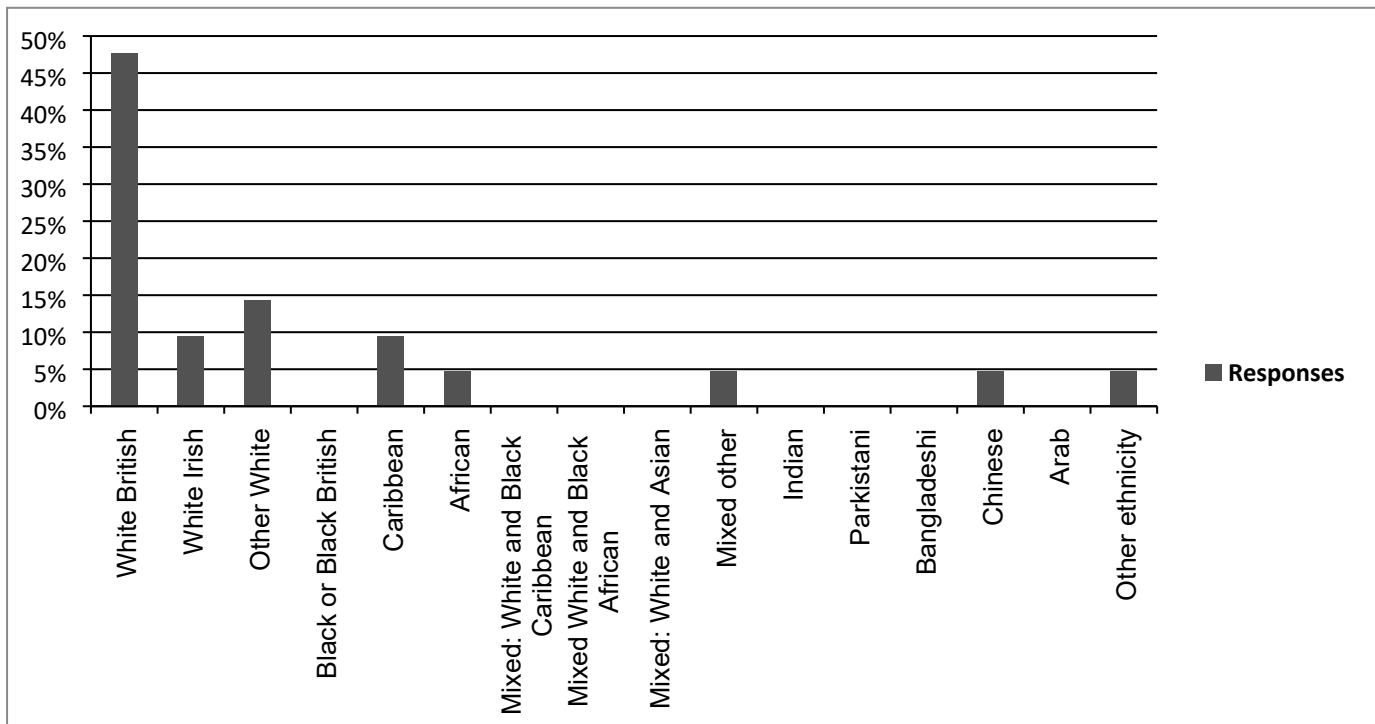
Q3. What is your gender?



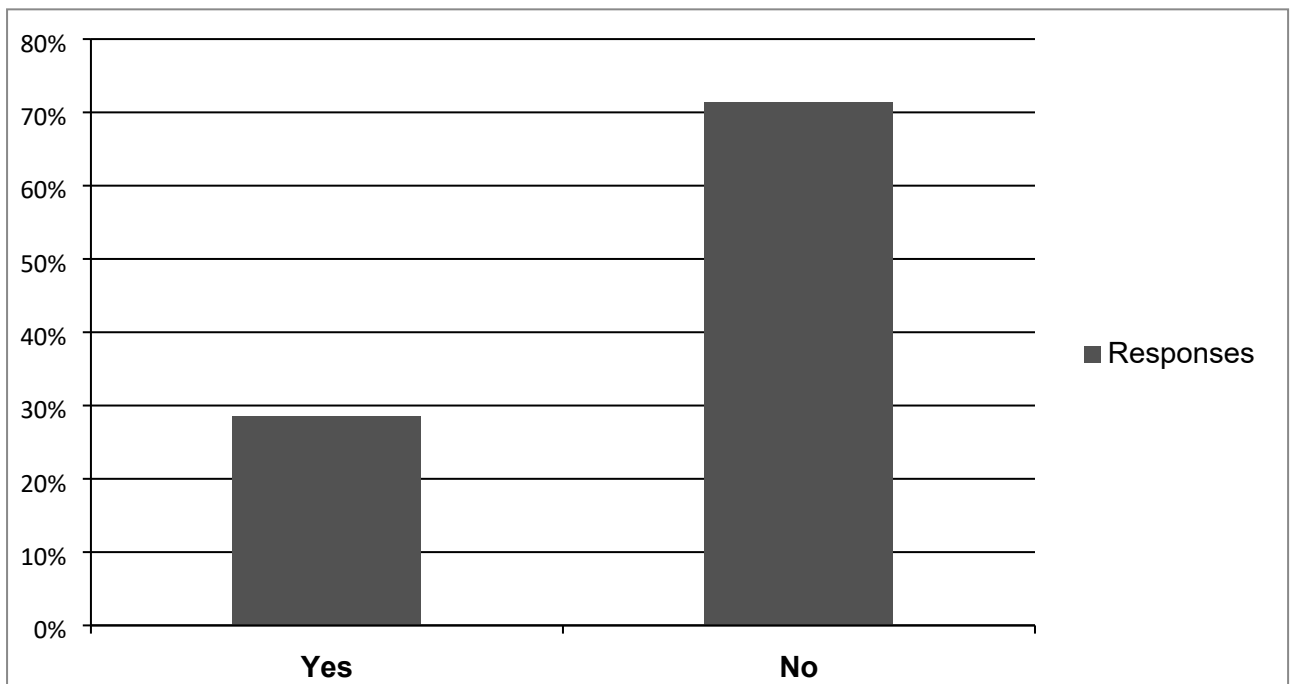
Q4. What is your age group?



Q5. How do you identify yourself?



Q6. Do you consider that you have a disability?



**Question 7- 15 comments have been taken directly from Survey Monkey online survey as submitted – with no alterations or spell check changes.*

Q7: Do you have any comments on section 4: Accessible consultations and engagement?

- 18 people responded to this question
- The majority replied “No”
- 3 people skipped the question

Comment received	Council response and action if required.
<i>Lack of engagement and consultation</i>	<p>The Council consulted with local communities, business and organisations using a number of methods such as letters, emails to circa 900 recipients. Social media messages ran on our Facebook and Twitter pages and an ads were placed on Facebook.</p> <p>Social media breakdown: Reach: The 18,492 people saw the ad at least once. <i>Reach is different to impressions, which may include multiple views</i></p> <p>Impressions: The 26,412 the number of times the ads were on screen</p>
<i>What's the point, Merton does what it wants, doesn't listen & delivers as little as possible</i>	The Council adheres to planning legislations in relation to planning matters.
<i>The room proposed for the consultation should be sufficiently large enough to house the anticipated numbers of attendees.</i>	The Council welcome this comment. Suggested text has been taken forward in the final SCI.
<i>7.13 “all changes is”. Should read “all changes are” 7.13 figure 4 should have “inform by emai” 7.19 should read “ a.....plan becomes”</i>	The Council welcome this comment and the appropriate changes have been made to the SCI.
<i>Generally agree, but unless otherwise commanded by national legislation I see no need to for translation documentation into anything other than a recognised language of the British Isles (including BSL and Braille). I would like to see in consultations the submissions of representation not only in writing, but that facilities for the recording by</i>	The Council welcome the support. The Council will make reasonable adjustment in accordance with the Equality Act 2010.

<i>audio, stenography or secretarial shorthand for verbatim or accurately edited notes be provided.</i>	
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Q8. Do you have any comments on Section 5: Our approach to involving the local community in planning?

- 19 people responded to this question
- A number of “No” responses were received
- 2 people skipped the question

Comment received	Council response
There is virtually no involvement of the local community. Locals views not taken into account	The Council works hard in engaging local communities and welcome views from communities. All views received are considered when preparing Local Plans and making planning decisions.
We are concerned that representations will not be available to view on the planning website. This is a backward step, creates a barrier to transparency. We would at very least hope that comments from non-statutory bodies such as Residents associations would be uploaded for residents to see. However, it seems only right that anyone should be able to see who has written and what they comments are, without having to add to the workload of the planning department by visiting the office to read the file. If GDPR is the reason for this change, it has been possible to upload letters and emails while redacting personal details. This seems a reasonable expectation.	Please see part b “The council’s response to planning applications” (para 3.12) below.
Yes. 5.1 states ‘we wish to ensure local communities are better informed about planning, its role...’ etc. By failing to publish submitted comments on planning applications on the Council website, you are not adhering to this aim. People who work, have children, or have mobility issues find it hard to make time or physically make the journey to the Civic Centre to look at hard copies of application comments - possibly on a repeated basis for a controversial application. This reduces democratic access to and transparency on planning matters and reduces information available to members of the public. This is backed up by point 3 in this section which states a Council intention to use electronic methods of consultation ‘including	Please see part b “The council’s response to planning applications” (para 3.12) below.

<p>email and the council's website to make involvement easier, quicker and more cost effective'. Allowing residents to read and consider comments on planning applications via the planning portal is clearly easier, quicker and more cost effective than having to make repeated appointments with an officer to view comments which have - as this document states - had personal details redacted anyway.</p>	
<p>I live on Kingston Road. I received no notice of a consultation for the works at Dundonald Church. This is going to have a big impact on me in terms of noise, on the very first weekend we were woken at 8am on a Saturday. I later found out this was approved by the Council ... I had no chance to object or submit. This needs to be a pro-active outreach by the Council and the developers, you should come to US as local residents and not hide away consultations.</p>	<p>Your comments are noted however, not within the remit of the SCI consultation or document.</p> <p>Comments have been forwarded to our colleagues in the Development Management team.</p>
<p>The layout of the document is not engaging and of a professional standard.</p>	<p>The consultation document and will be reviewed prior adoption.</p>
<p>I have started commenting on planning applications a great deal and I would like that my representations are responded to so that I can be sure they have been taken into account. I would like my representations to be made public on the internet so that my view can be communicated to the applicant and anyone else who is interested (despite data protection issues). Similarly, I would like to view other peoples' representations. This is democratic and informative. It would be helpful to have the applicants contact details published on the planning applications, or for a link to be provided to ensure that comments can be passed to these people.</p>	<p>Please see part b "The council's response to planning applications" (para 3.12) below.</p>
<p>Use different forms of communication to reach all sections of society, some do not use computers or mobile devices with social media</p>	<p>The Council carries out planning consultations in accordance with planning regulations and uses various communication methods for each consultation. We monitor and review methods used and were possible make changes depending on resources, the subject/topic of consultation and legislation.</p>
<p>Seek views at the earliest possible stages and throughout the planning process. - Indeed this is not happening. For amendments these are not publicised sufficiently even if considered minor/immaterial. Additionally submissions should be fact checked and advertising huff and misleading and inaccurate statements in</p>	<p>The SCI requires applicants to engage with local communities as early as possible, before submitting planning application. The Council also request that major sites are submitted to Council's Design Review Panel. This is to ensure that the views of local people and design professionals are</p>

<p>planning applications be directed to be removed from bundles submitted to officers and councillors to avoid bias language. Earliest opportunity includes a provision for a non-binding representation method at design review stage where relevant informed information can be submitted over and above the applicants submission and supposedly independent and professional review thereof. Where applications involve public realm or residences in the occupation of persons other than the land-owner there needs to be advertising that such items as may be in need of a planning involvement should be brought to the nearby public and the occupiers of land at the earliest point including any informal discussions and the basis for those discussions.</p>	<p>taken into account as soon as possible in developing the scheme. The Council carries out planning application consultations in accordance with planning regulations.</p> <p>In accordance with the National Planning policy Framework (NPPF), we are required to only request supporting information that is relevant, necessary and material to the application in question.</p>
<p>Other than 'Promote the use of electronic methods of consultation including email and the council's website to make involvement easier, quicker and more cost effective', all other bullet points are too vague.</p>	<p>The Council welcomes your comments.</p>
<p>Yes - the Morden development has had painfully little transparency and people in the area making major financial decisions about housing with no view of how long development is going to take or the phasing. Newsletter have not been released for over 12 months which is not a newsletter.</p>	<p>The proposed regeneration will be delivered through a partnership between the council, TfL and a development partner and will include new housing, retail and business space, expanded transport infrastructure and significantly improved public realm.</p> <p>In November 2019, our Cabinet considered a report and made recommendations on the next stage of the process, which will be the start of the procurement process to select a development partner.</p> <p>This report can be viewed on the council's webpage here. The report includes information on the timeline for the project.</p> <p>A major regeneration of this scale is likely to be phased over a number of years and will take some time to develop and deliver. The vision and objectives for the regeneration have been developed through engagement with the local community and further consultation will be undertaken as we proceed through the next stage of the project.</p> <p>We take on board your comment regarding</p>

	the newsletter – we aim to produce the newsletter on a regular bases in the future.
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Q9. Do you have any comments on Section 7: Statutory development planning documents?

- 17 people responded to this question
- A number of “No” responses were received
- 4 people skipped the question

Comment received	Council response and action if required.
Documents should be engaging, in plain English and well-illustrated.	Your comments have been welcomed and noted. The Council agrees that all documents must be engaging, wording must use the plain English practice and illustrated, where possible.
Make use of 'live' documents to keep up to date with policy and guidance, instead of documents becoming out of date shortly above being published	Note relevant to the SCI. Due to the nature of some development planning documents this not always possible, as they can be 'planning forward' documents over a set period for example is the Local Plan which, is a 15 year plan for the borough. The Council monitors and reviews our development planning documents and when statutory required to we will either update and/or produce new planning development documents, should planning legislation or planning policy requires us to do so.
Do we have a Neighbourhood Forum and, if not, should we have one?	The Council has 5 Neighbourhood Forums. This information and webpage links of forums has been added to the SCI.
There is a problem in that the legal 'Soundness' of a plan may not necessary be the best plan for the or from a range of alternatives, reasons for deciding why individual elements of a plan are 'sound' should be clearly given. When there is an area of opportunity where generally there has been no previoud development the rules for new development are valid. Where there is a change in the layout, density or similar where	Your comments are welcomed and noted. Not relevant to the SCI.

<p>there is existing development the interests of those in occupation of that land, including the immediate surroundings of that land, need better protection, involvement and weight in dealing with that proposed development , particular in respect of current Human Rights Act interests in Land and the present legal interpretation frameworks for that Act which go beyond protections in the "Town and Country Planning (Local Planning) Regulations 2012" which are deficient in reference to The Human Rights Act 1998 and Equalities Act 2010 notwithstanding the later date of the Regulations the earlier legislation takes judicial preference</p>	
<p>It is unclear other than the three estates listed in the Estate Local Plan 2018, where will the other regeneration take place. It will be useful to attach the links to all available documents for the community to see. It will also be useful to have one web page where all the updates, documents, schedule for events will be stored so we don't need to go to sign up to all the facebook, email, etc to get all the information.</p>	<p>Not relevant to the SCI. Future development and regeneration sites are outlined in the Local Plan, known as Site Allocations. The Council is currently producing a new Local Plan and will identify a number of sites for future development in Merton. The current site allocation are detailed in the Site and Polices Plan.</p> <p>All our development planning document can be viewed via our website here</p> <p>All Council wide consultations including development planning consultations can be viewed here</p>
<p>Current planning policy being used is out of date eg, the Mayor's Supplementary Planning Guidance is dated 2014. The Core Planning Strategy is dated 2011. #the new Local Plan will not be in place until 2021. Can you accelerate implementation of policies that support biodiversity in the light of more recent guidance: Mayor's draft London Plan, Policy G6, also the 2019 NPPF and NPPG: https://www.gov.uk/guidance/natural-environment https://www.gov.uk/government/news/protect-birds-when-building-says-james-brokenshireBiodiversity and access to nature:</p>	<p>Not relevant to the SCI. The Council monitors and reviews all planning documents and will either update, amend or produce new documents if required; for example if there are changes to planning legislation and/or policies (national and regional).</p> <p>An example of this is our Local Plan, we are currently producing a new Local Plan for Merton. In line with the soon to be adopted London Plan. Our Local Plan is required to be in conformity with the London Plan and the National Planning Policy Framework.</p> <p>Local Plans are required to have regard to</p>

	the supporting documents such as the national Planning Policy Guidance (supports the NPPF) and the Mayor’s Supplementary Guidance (SPG – supports the London Plan). For example is the Mayor’s Environment Strategy , which also covers biodiversity.
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Q10. Do you have any comments on Section 8: Development management?

18 people responded to this question

- A number of “No” responses were received
- 3 people skipped the question

Comment received	Council response and action if, required.
Yes. In point 8.13 it is stated that Merton Council’s website is “the key resource for finding out information about and commenting on planning applications”. This is now clearly untrue since comments on applications are no longer posted online. Point 8.29 states that personal details on all comments will be removed. If this is the case, why not then make those comments accessible online? It is a better democratic solution to allow people to browse information online at home rather than forcing them to visit the Civic Centre and browse comments there. Failing to provide this information online creates accessibility and inclusivity problems and reduces community involvement.	Please see part b “The council’s response to planning applications” (para 3.12) below.
Can you ensure that all representations are referred to by the planning officers in their reports and correspondence with the applicants, so that advice and information can be communicated to the applicants. Can you publicise options for enhancements for biodiversity which are not necessarily mandatory, to the applicants. Applicants may adopt biodiversity measure within their plans once they know about features which are available. This would result in gains for biodiversity.	Please see part b “The council’s response to planning applications” (para 3.12) below. We welcome you comment on biodiversity. In accordance with NPPF, planning policies and decisions ‘should contribute to and enhance the natural and local environment’.
During the optional pre-application stage encourage engagement with the consultation	Amendments made to Figure 6 (circa paragraph 9.4) to include this

bodies as well as the local community.	
Better enforcement at early stage of unauthorised development. Better enforcement at constuction stage and sign off of conditions to actually confirm that constuction- particular to waste handling functions during and from occupation are compliant and that transport plans are adhered to (cycle storage and similar).	Although these comments are not relevant to the SCI, these comments have been forwarded to our colleagues in the Development Management team.
In 8.13 is there supposed to be a link to the planning permission website page? If so it's not working.	The Link has been checked (now paragraph 9.3).
Yes. Section 8.16 outlines the types of application there is no statutory requirement to consult on. However, the Council does already routinely consult on many of these types of application. I have copied your wording below and added the actual application numbers of applications in the recent past as examples. "Certificates of lawfulness of proposed use or development - eg 19/P0339; 14/P1527 Certificates of lawfulness of existing use or development Internal alterations only to a Grade II listed building ♣ Advertisements - eg 19/P2709, 18/P4386 amongst many others ♣ Approval of details (exceptions are details for conservation area consents and external works to any listed building) Revisions to planning applications once valid (eg 19/P3408) Non-material amendments (eg 19/P3408)♣ Discharge of conditions (eg 19/P1626) The above are just a handful of examples - there are many others on the Council's planning portal. This transparency is extremely helpful to keep track of what's going on in the area and the impact it might have on Interested Parties. In addition, in the table in Figure 7 under the column headed 'Type of application' - the wording in some rows has been cut off making it very difficult to reconcile in some cases what the Council will consult on (and how) with what it says there's no statutory obligation to consult on. This whole section needs to be reconsidered and made much clearer in order for the public to form a view.	Amendment made (now paragraph 9.16).
Yes. Section 8.14 says that consultations on planning applications will last at least 21 days - my experience at the moment is that they	Amendments made see section 9.16 in the SCI.

<p>typically last between 4 and 6 weeks. 21 days is far too short for most types of application. Section 8.29 - all representations by the general public should be displayed on your website. This always used to be the case but the Council has recently taken to not doing this citing privacy concerns and the workload of having to remove personal details from emails. The Council needs to find a way around this because not displaying all reps on your website erodes the transparency of the system. Thirdly, an ancillary issue - the Council should ensure that all documents that are uploaded onto your website in connection with applications are carefully dated - this should happen all of the time but unfortunately doesn't. This makes it very difficult for Interested Parties to follow any changes to applications.</p>	<p>Please see part b “The council’s response to planning applications” (para 3.12) below.</p>
<p>Within morden - what development?</p>	<p>Not relevant to the SCI. The proposed regeneration will be delivered through a partnership between the council, TfL and a development partner and will include new housing, retail and business space, expanded transport infrastructure and significantly improved public realm.</p> <p>In November 2019, our Cabinet considered a report and made recommendations on the next stage of the process, which will be the start of the procurement process to select a development partner.</p> <p>This report can be viewed on the council’s webpage here. The report includes information on the timeline for the project.</p> <p>A major regeneration of this scale is likely to be phased over a number of years and will take some time to develop and deliver. The vision and objectives for the regeneration have been developed through engagement with the local community and further consultation will be undertaken as we proceed through the next stage of the project.</p>

Q11. Do you have any comments on Section 10: Principles of engagement?

- 15 people responded to this question
- The majority respond with “No”.
- 6 people skipped the question

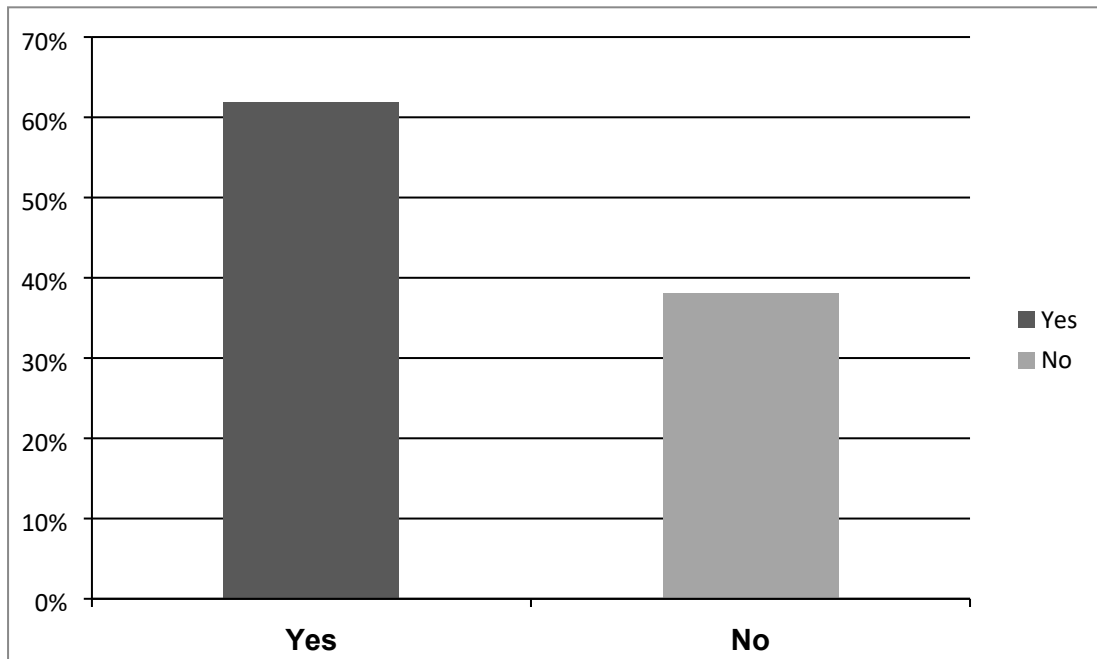
Comment received	Council response and action required/taken.
<p>Can you ask planning consultants and other consultation presenters to inform interested attendees of who to contact to make comments and how to contact developers, architects etc. Can you post information on upcoming consultations/presentations at libraries in prominent locations. It is difficult to find out what is going on locally without a regular local newspaper.</p>	<p>Comments are welcomed and noted.</p> <p>Information on the Merton ‘Get Involved’ database has been added to the SCI. This provide residents with more information on how to take part in all Merton Council consultations. Residents can register for consultation alerts.</p> <p>Amendment have been made to Figure 6, of the SCI to encourage applicants to advertise pre-application meetings as widely as possible using a variety of methods.</p>
<p>Will be good to get a definition of the plan for wider morden town centre area. At the moment the local 2020 plan states it will be 'incremental redevelopment and change in the Wider Morden Town Centre Area when landowners are ready to invest in their properties.' Does this mean it will be down to independent private investors to develop the land. Also will there be a plan for social housing?</p>	<p>Not relevant to the SCI. Merton new Local Plan sets out the council’s vision and objectives for the whole borough, including the wider Morden area and future housing development (types and tenure) as well as other topics. There will be another round of consultation on the new Local Plan in Autumn 2020.</p>

Q12. Do you have any other comments on the SCI?

- 16 people responded to this question
- The majority respond with “No”.
- 5 people skipped the question

Comment received	Council response and action taken if required.
Lots of people can manage emails, libraries and leaflets, but not many older people bother with twitter and facebook. It seems to be believed that twitter and facebook are mainstream methods of communication.	The Council monitors the consultation methods used for each development planning documents and will draw upon other methods such as workshops and exhibitions, where appropriate. This will depend on topic of the consultation and resources (staffing, costs).
The survey needs to be better linked to the document. I have tried to make my comments in the right section but it was difficult	Your comments are welcomed and noted for future consultations.
Not enough clarity on the theme of the transformation, type of housing and space required to achieve 2000 units, criteria of selection of housing to be demolished to increase housing density, and plans on the wider morden town centre area including the mosque.	Not relevant to the SCI. Merton new Local Plan sets out the council’s vision and objectives for the whole borough, including the wider Morden area and future housing development (types and tenure) as well as other topics. There will be another round of consultation on the new Local Plan in Autumn 2020 and these comments are being forwarded to the Local Plan officers.

Q13. Would you like to be contacted by Future Merton team in future about other future development planning policy documents?



This next section looks at the response received by either letter or email during the consultation

Consultee ref number and or ID number	Comments received	Council response and action taken if required.
001 SCI 2019/Wimbledon Society	Old style 'public consultation' needs to change to public involvement (10.4), and the Council's use of this term is welcomed. Consultation implies that a scheme design has already been decided on, where involvement implies an earlier and more creative role for the public.	Amendments have been made to the SCI, where appropriate.
	The present system still fails to reflect the open-ness and involvement that the public, and indeed the Government (and the Council see 8.7 & 8.9?) now seeks. Too often, the relationship between Councils/developers and the public has been described as paternalistic, and top-down. The public now needs to be seen	We agree and believe early public involvement is essential. Amendments to the SCI

	<p>by the Council and the developer as a contributing partner in the creation and evolution of projects. A fundamental change would see the public being made aware (on day one), that a scheme is being prepared for a site. It would then be able to contribute (see Section 10) to the creation of new development from the start.</p> <p>The “fait accompli” approach, where a developer presents of a set of finished drawings to the public at a late stage in the project, and asks whether they ‘like them’, is an outdated model. Early public and creative involvement should be the norm, and seen as a resource, not an obstacle</p>	
	<p>The Government (HMG) and Civic Voice and others are now encouraging this early creative approach. The Public intimately knows its town, with its history and character and people, and far better than any developer. This is valuable material that can help outsiders, helping to create designs that work locally, with pre-application advice (8.6).</p> <p>Developers deal with sites: they have no need to know about the planning of towns, it is not in their skill set.</p> <p>Once they have built and sold the new building to a pension fund, they disappear. The public, by contrast, lives with the result. Who has the greatest stake in the future of the town? And whose town is it anyway? So what specific changes should be considered?</p>	<p>Amendments to the SCI have been made to encourage developer to engage with local communities (now paragraph x)</p>
	<p>All pre - application meeting minutes and correspondence between developers and the Council officers should therefore</p>	<p>The Council does not automatically publicise details of pre-application discussions with potential developers until a</p>

	<p>be made public on a dedicated Council website on day one. If developers do not agree to this open and collaborative approach (usually quoting supposed 'confidentiality'), then the Council should not facilitate pre-application meetings (8.5).</p>	<p>planning application has been submitted. At application stage the pre-application report will be placed on the case file on the website.</p>
	<p>So-called viability statements should be made publicly available at the application stage to allow proper public examination. Currently there is no public confidence that these secret statements are other than excuses to avoid planning policy requirements. And concealing such 'material planning considerations' from public scrutiny cannot be right.</p> <p>Separately, the Council should press HMG to forthwith exclude so-called 'viability' from the planning system. Such calculations have their value but should stay inside developers' offices.</p>	<p>Your comments are welcomed. In regard to viability statements the Council must adhere to the requirements of the NPPF and other statutory requirements.</p>
<p>002 SCI 2019/ Merton Conservative Group</p>	<p><i>Online Access to Planning Representations:</i> The Council's position on not allowing Merton residents to have online access to planning applications' local representations is neither acceptable nor tenable; the Council's planning officer states that residents wishing to view objections must now <i>travel across</i> the Borough and view them in person at the Civic Centre..... The Conservative Group is happy to support this by engaging directly with the Information Commissioner to ensure the ICO understands the unintended effect of their potential sanctions and avoids any overzealous approach with regard to local authorities.</p>	<p>Please see part b "The council's response to planning applications" (para 3.12) below.</p>

	<p>The position of the Council at paragraph 8.29 is therefore not acceptable.</p>	
	<p>New software functionality for planning alerts:....Group advises the IT and Planning directors to review and implement as soon as possible a new planning alerts functionality to help residents and local community groups. Residents and community groups would be able to enter their own postcode (or another postcode in the Borough) into an online portal and then receive automated alerts of applications, decisions and appeals with a chosen radius.</p> <p>We understand the Conservative group in Wandsworth has implemented such a system and we advise Merton to look at bringing in the same helpful system for our Borough residents as soon as possible, in order to better service our residents and improve community involvement.</p>	<p>Please see part b “The council’s response to planning applications” (para 3.12) below.</p>
	<p>Procedure at the PAC: The Council must recognise that having Residents at the PAC is of the highest importance through our planning processes. The work of Planning Officers in supporting such processes is vital. The support given at the PAC must be objective, impartial and consistent. Where residents and committee members come to a decision regarding an application, the planning officers’ help in ensuring the recording of a suitable rationale in the correct technical terms is valued and needed.</p>	<p>No amendments proposed</p>

	<p>Use of online communications and social media: The Conservative group very much supports the use of digital interfaces and social media to support planning processes and consultations, in particular with regard to changes in Borough plans and policies.</p>	<p>No amendments proposed</p>
	<p>Communication with ward councillors: To better facilitate the opportunity for engagement with community, planning officers should reach out to ward councillors to inform them of more significant applications in their wards at the earliest opportunity.</p> <p>Planning officers should encourage applicants to do this as well, ideally at the pre application stage, but planning officers must also take the opportunity to proactively notify ward councillors to help seek the views of the local community and improve involvement.</p>	<p>We note your comments and have forward them to Development Management colleagues.</p>
	<p>Enforcement of Conditions: The trust and confidence of the local community is sometimes challenged by applicants not complying with planning conditions during and post build. To facilitate a better level of trust from the community and lessen the need for more challenging community engagement post build, the Council's planning department would benefit from applying a more rigorous approach to enforcement of conditions immediately post-build. Where conditions require</p>	<p>Not relevant to the SCI.</p> <p>Your comments have been forwarded to our colleagues in the enforcement team.</p>

	<p>plantings, trees, beds and shrubs, such conditions and final inspections must become a priority for the Council's enforcement policy in order to assist better air quality outcomes and improved amenity and urban greening.</p>	
	<p>Planning notices: A review of the Council's processes to serve the required notices on local residents and interested parties who may have responded to applications, must be undertaken. Too many residents and affected groups do not receive the required notices and letters, compromising stakeholder trust and confidence and creating inefficiency as planning periods have to be recommenced as notices are served afresh.</p>	<p>Your comments have been forwarded to the Development Management team.</p>
	<p>Design Review Panel: The Design Review Panel needs to become more transparent and accountable in its work such that residents achieve a greater degree of confidence in the work it is doing to achieve better quality designs for new developments. The ability for the community and residents to attend or monitor the DRP should be clarified, along with the Panel's constitution.</p>	<p>Please see part a "The Council's response to Design Review Panel" (para 3.4) below</p>
<p>003SCI2019/Historic England</p>	<p>We support the general aims and approach of the draft SCI.</p>	<p>We welcome your support.</p>

<p>004SCI2019/Merton Liberal Democrats</p>	<p>The benefits of involving the local community: We are pleased to see the Council acknowledge the importance of involving the local community. In particular, the point you make that the Council is <i>“Benefiting from the detailed local knowledge and perspective of local people and community organisations/groups.”</i> An accessible, easy and low cost way of assisting people to do this is by having representations made available on the Council’s website. This allows residents and councillors to have a rounded view and as broad perspective on an application as possible, and to contextualise their own representations.</p>	<p>We welcome you support.</p>
	<p>Accessible consultations and engagement: We agree that “Plain English” should be used for communications about planning, and would request that documents such as standard letters inviting people to PAC etc be included within this.</p>	<p>Your comments have been forwarded to the Development Management team.</p>
	<p>Our approach to involving the local community in planning We are pleased that the Council wants to “Promote the use of electronic methods of consultation including email and the Council’s website to make involvement easier, quicker and more cost effective”, but note that this is not promoted if access to planning representations is not part of this approach.</p>	<p>Please see part b “The council’s response to planning applications” (para 3.12) below.</p>
	<p>General Data Protection Regulation (GDPR) / 8. Consultation on Planning Applications / How to comment on a planning application: We note that the requirement to redact certain information from planning representations is set out in the Planning department privacy notice and that that privacy notice</p>	<p>Please see part b “The council’s response to planning applications” (para 3.12) below.</p>

	<p>states that “Sometimes we might decide it is necessary, justified and lawful to disclose data that appears in the list above. In these circumstances we will let you know of our intention before we publish anything.”</p> <p>Notwithstanding the Council’s position that publishing planning representations online risks disclosure of personal information that should be redacted under the Council’s privacy notice, this is also a risk when hard copies of representations are made available to residents as per para 8.29 (and indeed it has been suggested to us by officers that representations may be emailed out to residents). The risk of disclosure is not an inherent risk of the information being made available online, but a risk of human error – stopping online publication does not reduce the risk of human error.</p> <p>Para 8.29 asserts that “All personal details will be removed by the Council in accordance with General Data Protection Regulations”. This seems an unclear comment as not all personal details are to be removed, simply those that are indicated under the privacy notice as to be redacted. Indeed, the privacy notice itself indicates that sometimes the Council will determine to publish information that would normally be redacted.</p> <p>We would ask that the Council seek formal legal (and possibly ICO) advice with interpreting the implications of GDPR and the 2018 Act in this area.</p>	
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	<p>Neighbourhood planning We believe that the Council should proactively work with local communities to create Neighbourhood Plans for local neighbourhoods to give people real control over the development in their area, by turning residents' views into planning rules. It should be an ambition for the Council for Neighbourhood plans to be developed and put in place.</p>	<p>Not relevant to the SCI.</p> <p>The Council works with communities who wish to develop a Neighbourhood Plan. It is local communities who decide whether they wish to have a neighbourhood plan for their area.</p>
	<p>Consultation on Planning Applications /How to comment on a planning application We would ask that further guidance could be given, and perhaps a protocol can be developed for planning case officers for how residents might input into potential planning conditions and the subject of s 106 agreements to mitigate the impact of developments.</p>	<p>No amendments proposed.</p>
<p>005 SCI2019/ Metropolitan Police Service (MPS)</p>	<p>We are pleased to see that the MPS has been recognised as a 'specific consultation body' and therefore are consulted with regards to the preparation of planning policy documents.the Metropolitan Police Service requests that they are also consulted on planning applications which are referred to the Mayor of London for consultation. This is to enable the following:</p> <ul style="list-style-type: none"> • Delivery of a Dedicated Ward Office (DWO): The MPS have identified the need for Dedicated Ward Office (DWO) accommodation in specific locations as part of their Estates Strategy. A DWO is a small room containing lockers and operational equipment and forms a 24/7 base of operation for 	<p>Not relevant to the SCI, however, your comments relating to S106 have been forwarded to the S105/CIL team.</p> <p>The Council engages and meets with the MPS as well as other statutory and will continue to do so.</p>

	<p>the MPS. Further information can be found in the enclosed package including a map showing areas with the greatest need.</p> <ul style="list-style-type: none"> • Inclusion within the Section 106: It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within the S106. The MPS requests that they are also involved in these discussions. Relevant case law is enclosed in relation to the principle of developer contributions towards policing. 	
006SCI2019/Natural England	We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.	We welcome your support.
007SCI2019/Merton Centre for Independent Living (Merton CIL)	<p>Accessible consultations and Engagement: Merton CIL recommends referring to Disabled people rather than 'those with disabilities'..... We would also suggest the document refer to accessible facilities, for example, an accessible toilet rather than a disabled toilet.</p> <p>We would recommend providing all documents electronically - this will often meet people's need to access documents in alternative formats. The reference to audio tape and even CDs sounds very out of date - some young people may not even know what an audio tape is.</p>	<p>Amendments have been made to the SCI (now paragraph 6.1)</p> <p>This section has been informed by the Government's guidance, Accessible communication formats and additional text has been added to the SCI reflecting the Government guidance.</p>
	Our approach to involving the local community in planning: We	Your comment is welcomed. Requirements relating to people

	<p>understand and recognise the growing importance of electronic involvement, particularly as it can make the process more accessible for many Disabled people. However, we believe that a balanced approach is needed to ensure the widest possible range of people is involved. This is reflected elsewhere in the document but may need to be stated here.</p>	<p>with disabilities are included in paragraph 6.1</p>
	<p>Statutory development of planning documents: We recommend that the Council explores approaches around co- production and co- design for all aspects of planning. The value of these approaches is gaining increasing recognition as giving a strong basis for community involvement. Co- production involves developing a set of principles for communities and public services to work together as equal partners.....We also recommend the Statement recognises that engagement with disabled-led organisations is preferred over those that are not led by Disabled people when working on disability issues.</p>	<p>No changes proposed.</p>
	<p>Targeted events: We welcome the recognition that targeted events may be needed with Disabled people and mental health service users (which should be expressed in these terms).</p>	<p>We welcome your support.</p>
	<p>Development management For point: we believe the Merton Design Panel would benefit from having a member who has technical expertise on disability access in architecture and design.</p>	<p>Please see part a “The Council’s response to Design Review Panel” (para 3.4) below</p>
	<p>For point 8.26 we recommend disability access should be a material consideration, if this is possible.</p>	<p>Not relevant to the SCI. All developments proposals are required to comply with Building Reg M on accessibility</p>

<p>Mitcham Cricket Green Community and Heritage</p>	<p>a poor quality online management system for planning applications using an out of date version of Planning Explorer</p> <p>an inability to access planning applications and related information via an online map, as is the norm in other London boroughs</p> <p>recent withdrawal of citizen representations on planning applications from Planning Explorer and removal of information on closed planning applications, contrary to the practice of the majority of local planning authorities in both London and England</p>	<p>Please see part b “The council’s response to planning applications” (para 3.12) below.</p>
	<p>inadequate transparency in the operation of the Design Review Panel, including in the recruitment of members, provision of information on meetings, participation of Planning Committee members, lack of public access to meetings involving Merton Council’s own development, convening of sub-groups without any publicity or public record and limited and inconsistent provision of reports</p> <p>inconsistent provision of pre-application advice and Design Review Panel reports on Planning Explorer</p>	<p>Please see part a “The Council’s response to Design Review Panel” (para 3.4) below</p>
	<p>inadequate and inconsistent neighbour notification</p>	<p>Your comment have been forwarded to the Development Management team. The Council sends out notifications/letters using Royal Mail.</p>

	<p>recently reduced opportunities for the public to speak at Planning Committee meetings for a local authority which prides itself on being one of the first to make this possible</p>	<p>The procedure for Public Speaking at Planning Committee changed in 2017.</p> <p>Prior to May 2017 three objectors were allowed to speak and each was allowed 3 minutes.</p> <p>After May 2017 the number of objectors routinely allowed was reduced to two, with each one still allowed 3 minutes.</p> <p>However, public speaking at Planning Committee is at the discretion of the Chair, and when there is a large item with a lot of public interest the Chair has the authority to increase the number of speakers.</p> <p>An example of is the Tesco site, Burlington Road application were, the chair is will be allowing three speakers at this week's meeting on the Tesco site, Burlington Road application.</p> <p>The change in speakers arrangements was confirmed at the Planning Committee Meeting on 17 March 2017: https://mertonintranet.moderngov.co.uk/ieListDocuments.aspx?CId=155&MId=2633&Ver=4</p>
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	<p>poor quality online information presented via a visually unappealing website that is hard to navigate, lacks use of Plain English and provides planning policies buried in multiple policy documents downloadable only as large files</p> <p>inadequate reporting mechanisms for enforcing planning controls and the lack of a public register of outstanding enforcement issues</p>	<p>Merton Council is currently making changes to our webpages in accordance with legislation and/or guidance.</p> <p>We agree that our pages, publications and document should use plain English where feasible</p>
	<p>a failure consistently to abide by internal protocols for acknowledging and responding to emails on planning issues</p>	<p>We note your comment.</p>
	<p>inconsistent approaches to the validation of planning applications submitted with inadequate information</p> <p>variable handling of documents provided online with significant amendments to planning applications and their supporting documents being made without any notification to those making representations</p> <p>an inconsistent approach to publicising “non-material amendments” to planning applications</p> <p>variable quality in the reporting of public representations made on planning applications in officer reports to Planning Committee</p>	<p>Not relevant to the SCI. Your comments have been forwarded to the Development Management team.</p>
	<p>a lack of coherent communications about the work programme and priorities for the future Merton, development management and enforcement teams</p>	<p>Not relevant to the SCI.</p>

	<p>a lack of any protocol for informing applicants seeking pre-application advice of the importance of engaging with identified local community groups, including Mitcham Cricket Green Community & Heritage.</p>	<p>The Council encourages developers to engage with Merton diverse local communities for example community groups/organisation that represent and speak on behalf of BAME (Black and Asian Minority Ethnicity) groups, religious, children and young people demographic who are often underrepresented who may not engaging in the planning matters, as well as heritage groups.</p>
	<p>a lack of engagement with the local community through well-established design tools and processes, including masterplanning and design codes for significant areas</p> <p>a variable and inconsistent approach to community engagement in the development of the planning policy evidence base</p>	<p>The Council will use other appropriate planning/design tool such as masterplanning, where appropriate.</p>
	<p>out of date and incomplete Conservation Area Appraisal and Management Plans which deny the opportunity for community engagement in their future</p> <p>incomplete coverage and completion of character studies across the borough.</p>	<p>The council acknowledges that these documents are either out of date of incomplete –due to resourcing issues (staff) we have in the past been unable to move forward with this work. We hope that in 2020/21 we will be in a position to kick start this important work.</p>
	<p>withdrawal of planning and design issues from the previous Heritage and Design Working Group</p>	<p>Not relevant to the SCI.</p>

<p>Wimbledon East Hillside Residents Association</p>	<ul style="list-style-type: none"> • Lack of transparency and concerns how consultations are held • The use of Survey Monkey as a engagement tool • Comments on wimbledon (Masterplan) SPD – zero carbon, climate change, 	<p>Our approach to the last Future Wimbledon masterplan consultation was to use Survey Monkey as it's an easy to use digital platform for people to respond, especially on mobiles. It also gives us greater analytic capabilities</p> <p>The Council welcomed all views on the plan, therefore Survey Monkey was set up as a 'free-text' blank box. This allows for all respondents to give their personal views, unrestricted.</p> <p>Following feedback, the current consultation is structured using the themes and sections of the document that were influenced by the community responses.</p>
<p>Ref: 010 SCI 2019</p>	<p>No consultations of any sort are done before an applicant has started his pre-application meetings. The pre-application meetings remain under wraps, behind closed doors.</p>	<p>The Council encourages developers to engage with local communities before submitting planning applications especially for large and sensitive developments.</p>
	<p>1- Planning Management Team: (Development Team)</p> <p>A) Consistent errors in applications which are not amended or corrected except with robust resident insistence. These discrepancies and errors often end up at PAC with erroneous documents which are presented as fact.</p> <p>B) Case officers rarely reply to emails/queries relating to applications</p> <p>C) The culture of the planning control team is to distance themselves as far as possible from</p>	<p>Not relevant to the SCI. We welcome your comments and have forwarded them on to the Development Management and Web team.</p>

	<p>the community or locals. The minimum statutory duty is applied or at times not applied at all. There is an autocratic approach that case officers know best and locals are an irritant to be avoided.</p> <p>D) Inconsistency in decisions, policy interpretation.</p> <p>E) Loss of representations is frequent. Now that representations can't be seen online which alerted one to their potential loss, this remains a huge concern for transparency</p> <p>F) Amendments to major plans on the portal are regularly not flagged to those who sent in representations. Dormant applications of more than a year also have reappeared on PAC agendas with major amendments that no one knew about and accordingly could not comment on. An officer response that they were insignificant still does not allow for statutory consultation to take place.</p> <p>G) Inconsistent handling of what constitutes a non-material change. It seems to depend on the officer; a similar application would be deemed material change when it wasn't with another.</p> <p>H) Unwelcoming and archaic planning website which does not</p>	
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	<p>cater to the lay person – you have to be well-versed in planning and policy in order to respond to consultations and have patience of a god to navigate the website which often has incorrect links.</p> <p>I) Developers are applying unwelcome town-changing plans based on non-adopted planning policies.(Francis Grove/Draft Wimbledon Masterplan) – Future Merton urban team advice according to the applicant.</p> <p>J) Borough character and heritage site studies remain unfinished which leaves the scope open for numerous and damaging development interpretations – Future Merton Team</p> <p>K) Pre-applications don't seem to guide developers away from poor planning examples in the area. NEW planning policies have to be applied and not a re-hash of the old – officers appear not to be well-versed in local aspirations, local knowledge and are slow and reluctant at applying new national policies. The result is a tired, opaque, consistently poor outcome.</p> <p>L) Officers and urban designers regularly advise developers on</p>	
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	<p>site development and not within context of whole street/neighbourhood/a spirited local character for the area. An early conversation with the locals to take their views into account (not just to say they have spoken to locals) could facilitate and expedite the planning process. Poor planning examples continue to dog due to lack of local consultation and not taking local views on board. Why did case officers and urban designer agree for a building to be painted dark grey to create the first anomaly on a vibrant terracotta-dominant high street opposite a popular and well-visited Grade II theatre??</p>	
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1.8 During the public involvement/consultation we received a number of comments on the following topics:

- Design review panel
- Planning applications no longer on the council website

1.9 For these two topics we have combine the comments and the Council responded to them collectively covering the issues raised.

a) The Council's response on **Design Review Panel**

Confidentiality of DRP

1.10 The pre-application process is a legitimate and well established means of discussion between the local planning authority and prospective applicants for planning permission. This is currently run as a 'confidential' service. When the Design Review Panel (DRP) reviews pre-application proposals, it is therefore appropriate to maintain consistency in this

respect. Not to do so is likely to put-off applicants from using the DRP, which they have no obligation to use. This would be detrimental to improving design quality. When pre-applications become live applications for what is essentially the same scheme, the protocol is that the pre-application comments of the DRP should be put on the public application page on Planning Explorer.

Scrutiny of DRP

- 1.11 The DRP is not a constituted council committee and therefore not subject to the same levels of scrutiny and organisation. It is therefore not a collaborative process in itself, but part of one. The views of the DRP are one of many material planning considerations the case officer/Planning Applications Committee (PAC) needs to take into account in making a decision. The DRP is not a decision making body and it is not a substitute for advice given by council officers. It gives specialist design advice to the applicant and council as a whole to enable the applicant to improve its proposals in terms of design, and to inform (but not replace) decision making by the local planning authority.

Public attendance of DRP

- 1.12 The vast majority of design review panels do not consist of public attendance and some do not even publish their comments. This is not a point of secrecy. This is because they are there to seek the views of particular people. Thus with those panels that allow public attendance, the attendees can only observe. In all cases where a design reviewed proposal leads to a full planning application, the DRP comments are either available publicly on the DRP webpage or through the Planning Explorer. As the DRP is an occasional consultee, the need for scrutiny and monitoring should not necessarily be more onerous or different from that applied to other similar consultees.

Workshops and DRP

- 1.13 There are a number of different types of review undertaken, depending on the stage in the development process a proposal is. Workshops are less formal and early stage, and follow-up reviews often smaller and quicker, after a main review has taken place. Merton DRP rarely uses these approaches, but where it does, they are subject to the same public availability as mentioned above.

Recruitment of DRP members

- 1.14 As most DRPs are not a formal part of the committee process of local authorities, recruitment of panel members is not normally done through a council's formal recruitment process. It should also be noted that there are also private companies that run panels for local authorities and they have their own recruitment processes. Recruitment for Merton DRP is

similarly organised. Recruitment is refreshed every few years by advertising through professional organisations. As with any recruitment process, appropriate processes must be balanced with confidentiality for applicants. This process is managed as part of the DRP management with applications assessed and reviewed by suitably qualified officers.

Skill set of DRP members

- 1.15 It is normal practice for Panels to have an 'open invitation' for suitably qualified professionals to express interest in becoming panel members. They are then considered along with others when a periodic membership review happens. Achieving quality design requires a range of built environment skills and recruitment aims to ensure there are appropriate skills represented by panel members. Due regard is also given to making the panel as diverse and representative as those within the profession and to community they serve, seeking an age, gender and ethnicity profile that achieves this. Accessibility requirements for buildings are covered by Building Regulations which practising professionals are required to build by.

DRP Influence on the Planning Committees

- 1.16 Good practice guidance is clear that the views of the DRP are a collective view, and not those of any particular individual. This is the way in which notes are written. Notes are viewed and commented on by Panel members and the chair before being finalised. During meetings the role of the chair ensures every panel member has a say and individuals are not allowed to dominate. These procedures ensure the final notes are a balanced view of the Panel as a whole and provide as clear a steer for the applicant as possible. The chair takes no part in influencing design comments and does not make design comments. As a councillor the chair only manages the way the meeting is run. Traffic light verdicts are intended to give a snapshot view at the end of a meeting. It is the full notes published after the meeting which is the full record of the Panel's views. This system crystallises the views of the Panel and helps give the applicant a clear steer. Notes of meetings are notes of what was said by the panel at the meeting only, and are not altered after the meeting and contain only the views of the Panel which reviews the proposals.

Review of Merton's DRP

- 1.17 The council has been operating a DRP for over 13 years. During this time it has played an important role in improving design quality for a number of built developments. The council is aware however, that in this time the landscape within which design review operates has changed. The policy context has also changed and become clearer regarding the need to have design review panels. To this end the council is undertaking a process of review of how the Merton DRP operates. The purpose of this is to ensure the panel operates according to best practice. This process has begun and will continue throughout 2020."

b) The Council's response on changes to viewing planning applications

- 1.18 Residents are able to comment on planning applications as part of the statutory consultation process. Comments received are fully considered and summarised in the relevant reports which are then uploaded onto the website and are available for public viewing. Such correspondence (redacted) is also available and requests can be made to the development control team (planning.representations@merton.gov.uk). There is no statutory duty to display such representations on the website.
- 1.19 A decision was made not to display representations at this time due to the risk of personal information being uploaded contrary to Article 5 (1) (f) of the GDPR which “requires that personal data shall be: processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).” The Council had experience a number of data breached due to the quantity of such letters received. The decision not to display is in line with around half of other London Councils. However, the council is currently investigating other ways to make representation easily available in the public domain with a new upgrade to the existing IT system which may include redaction software.

Committee: Cabinet

Date: 15 June 2020

Agenda item:

Wards: all

Subject: Locally listed buildings

Lead officers: Chris Lee, Director of Environment & Regeneration; James McGinley, Head of Sustainable Communities;

Lead member: Councillor Martin Whelton, Cabinet Member for Regeneration, Environment and Housing.

Contact officer: Jill Tyndale, conservation officer

Recommendations:

That, having considered the advice from the Borough Plan Advisory Committee, Cabinet resolve to:

- A Considers the proposed additions to Merton Local List and resolves to recommend these additions to Full Council.
- B Considers the proposal not to add 4-7 Upper Green East and 7-11 Upper Green West to Merton Local List and resolves to not to recommend these additions to Full Council.
- C. The Borough Plan Panel recommended that Cabinet resolve to undertake a review of and consultation on additions to the Local List each year and present the report to the Borough Plan Advisory Committee.

1 PURPOSE OF REPORT

- 1.1 Periodically Merton's Local List is reviewed and additions are agreed. In April 2016 the Borough Plan Advisory Committee advised on a new approach to reviewing Locally Listed buildings and structures which was incorporated into the BPAC Terms of Reference at full council in May 2016
- 1.2 Additions to Merton's Local List are put forward by members of the public, community groups and council officers. The additions are assessed by the council's conservation officer against seven criteria identified in Merton's guidance for selection of buildings and structures to be considered for Local Listing. The criteria are; architectural style, age and history, detailing, group value, building

materials and subsequent alterations.

- 1.3 The proposals for Local Listing have been subject to public consultation. Individuals and organisations responsible for the buildings or structures being proposed for inclusion have also been consulted directly. Generally responders were in support of the Local Listings. Some added useful and further information. The proposals have been amended where appropriate in response to comments received. Comments from consultees have been added after each description.
- 1.4 On 4th June 2020 the Borough Plan Advisory Committee considered the report on locally listed buildings. BPAC resolved to recommend all of the officer's recommendations to Cabinet that are contained in this report apart from the following:
- 1.4.1 *The Cast Iron Sewer Vent, Southside, Wimbledon Common.* The Borough Plan Advisory committee resolved to recommend that this item should be deferred to the next round of Local Listing as the landowner is currently unknown and may not have had the opportunity to respond to the consultation.
- 1.4.2 *Mitcham Police Station.* The Borough Plan Advisory Committee resolved to recommend that this item should be deferred to the next round of Local Listing as the information in the officer's report needs to be updated to represent the current building as at 2020.
- 1.4.3 At their meeting on 4th June the Borough Plan Panel also resolved to add a recommendation to the report: that Cabinet resolve to undertake a review of and consultation on additions to the Local List each year and present the report to the Borough Plan Advisory Committee.

2 Proposals

- 2.1 Proposals for buildings and structures to be added to the Local List are set out below. All are recommended for addition to the Local List by officers apart from 4-7 Upper Green West, Mitcham, CR4 3AA and 5-11 Upper Green East, Mitcham CR4 2PE;

- **Street Lighting Control Cabinet, Hartfield Crescent jcn. Beulah Road**
- **Ridgway Stables, 93 Ridgway, Wimbledon, SW19**
- **Manor Club and Institute, 76 Kingston Road, South Wimbledon.**
- **John Innis Cricket Club Pavilion.**
- **Swan Public House, 89 Ridgway**
- **Trolleybus Traction Pole, 241-243, Burlington Road.**
- **The Vicarage, 16 Copse Hill**

- Morden Court Parade, London Road.
- 20 Malcolm Road, SW19 4AS
- Street Lamp Standards, Bertram Cottages
- 62, 64, 66, 70, 72, 74 & 76 Bathgate Road
- Cast Iron Sewer Vent, Southside, Wimbledon Common.
- Art Deco Commercial Buildings on Lombard Road, Lombard Business Park.
- Mitcham Police Station, 58 Cricket Green, Mitcham
- Kellaway House, 326 London Road, Mitcham, CR4 3ND

Proposals not recommended:

- 4, 5, 6 & 7 Upper Green West, Mitcham CR4 3AA.
- 5, 7, 9 & 11 Upper Green East, Mitcham CR4 2PE.

2.2 Street Lighting Control Cabinet, Hartfield Crescent jcn. Beulah Road

Submitted by Council Officer





This is an old manual Street Lighting Control Box. Which controlled the time by a clock to turn on the Street Lights or alternatively you could switch the control to the Town Hall where they could be controlled from there.

- 2.2.1 Architectural Style: Good - Street furniture
- 2.2.2 Age and History Good - Probably Late Victorian. Would have been used up to 1970/80s.
- 2.2.3 Detailing Quite good - Decorative pattern work particularly on the front. The top is stepped culminating with a shallow pyramid form. The internal mechanisms are still in place.
- 2.2.4 Group Value None
- 2.2.5 Building Materials Fair - Painted Cast Iron
- 2.2.6 Subsequent Alterations None. No longer used
- 2.2.7 Comment from adjacent property believing it was on his land, not public land.
- 2.2.8 ***Recommend that the Street Lighting Control Cabinet is added to the Local List***

2.3 Ridgway Stables, 93 Ridgway, Wimbledon, SW19

Submitted by a member of the public.



Pre 1865 built possibly at the same time as The Swan Pub. 1865 map shows the stables to the rear of the Swan Pub on the same footprint as they are currently. These are original livery stables supporting the public house when horsepower was the main form of transport. Above the original stables is accommodation for the grooms. The site has been divided to allow part of the original stable, possibly coach house and hayloft to remain within curtilage of the Pub. I suggest that the current stable and the part remaining with the Pub to be considered as one for adding to the Local List.

- 2.3.2 Architectural Style Good - Simple rural vernacular style stable buildings typical of rear of pub stabling.
- 2.3.3 Age and History Good - Pre 1865
- 2.3.4 Detailing Fair - Simple windows and doors with fanlights over. Stable doors possibly original plus original iron hinges.
- 2.3.5 Group Value These stables have similarity to the stables behind the Dog and Fox
- 2.3.6 Building Materials Fair - Painted brick, slate roofs, Timber stable doors, some original paving. Original doors and windows to upper parts. Many original internal features.
- 2.3.7 Subsequent Alterations Historic roller shutter from the time it was used as a garage. Later stables added across the separation wall from the pub.
- 2.3.8 No comments received in response to Consultation.
- 2.3.9 ***Recommend that Ridgway Stables are added to the Local List***

2.4 Manor Club and Institute, 76 Kingston Road, South Wimbledon.

Submitted by Council Officer



Built as the Manor Club and Institute for the Merton Park Area in 1890 by Henry Quatermaine for John Innis, local philanthropist. It had continued in community use from that time. Now vacant. At the time it was built it had a reading room down stairs and a billiards room on the first floor. A large 'general' room on the ground floor held lectures. A bowling green was and still is, although unmaintained, at the rear. In more recent times a bar was introduced although it appears beer was always served.

In the 1940s the front bay was possibly rebuilt due to cracks in the brick work. This may have been war damage.

- | | | |
|-------|--|---|
| 2.4.1 | Architectural Style | Good - Influenced by the Arts and Crafts movement. |
| 2.4.2 | Age and History | Good - 1890, Quatermaine. |
| 2.4.3 | Detailing | Quite Good - Mainly yellow stock bricks with red brick dressings featuring the front facing bay and quoins. There is a fine stained glass window on the west elevation. |
| 2.4.4 | Group Value | Some - This is one of a number of community buildings sponsored by John Innes and built by Quatermaine along Kingston Road. It forms a pair with Merton Hall. |
| 2.4.5 | Building Materials | Quite Good - Brick, yellow stocks and red stocks, and stone surrounds. Clay roofing tiles. |
| 2.4.6 | Subsequent Alterations | Generally unaltered from the street view. Internal alterations have been made. |
| 2.4.7 | No comments received in response to Consultation. | |
| 2.4.8 | <i>Recommend that the Manor Club is added to the Local List</i> | |

2.5 John Innes Cricket Club Pavilion.

Submitted by club member.



Merton Cricket Club has played at John Innes Recreation Ground since 1908. John Innes established the ground to be used for “outdoor games, especially for cricket and football and for the meeting and drilling of volunteer or other military bodies.” It was run by the John Innes charitable trust until 1949 when the local council took over the management.

The Pavilion dates from the early 1900s. It is a timber construction which unfortunately was badly damaged by fire in 1970s. It was partially rebuilt following as much as possible the original design. Internally it is panelled, both downstairs and upstairs. It has been sympathetically extended at the rear to provide added facilities for the members.

- 2.5.1 Architectural Style Fair - Deep roofed pavilion with dormers. Timber construction.
- 2.5.2 Age and History Good - The club house is built on the sports ground provided by John Innes. The Club is associated with a number of famous cricketers including Sir Jack Hobbs, Laurie Fishlock and Pat Pocock. Merton Hockey Club established 1893 also uses the John Innes Pavilion.
- 2.5.3 Detailing Fair - Strained timber construction, Timber framed windows, sash at ground floor level and casement dormers.
- 2.5.4 Group Value None
- 2.5.5 Building Materials Fair - Timber structure and clad
- 2.5.6 Subsequent Alterations Sympathetically extended at the rear to provide added facilities. Temporary shutters are used to protect the windows for security reasons.
- 2.5.7 No comments received in response to Consultation.
- 2.5.8 ***Recommend that John Innes Cricket Pavilion is added to the Local List***

2.6 **Swan Public House, 89 Ridgway**

Submitted by Council Officer

This is a two storey building plus cellars. Rendered with hipped slate roofs. It has



three bays to the front with a central main entrance. There is an original two storey side wing at the rear of the building. A single storey side extension along the west side previously gave access the saloon bar but has now been blocked up and forms part of the internal space. A previous Georgian style porch has been replaced.

- | | | |
|-------|---|---|
| 2.6.1 | Architectural Style | Good - Georgian |
| 2.6.2 | Age and History | Good - Pre 1865 built as a Public House |
| 2.6.3 | Detailing | Quite Good - Typical Simple Georgian public house building with square headed front facing sash windows with the exception of the upper centre window which features an arch. Hipped slate roofs. |
| 2.6.4 | | Group Value None |
| 2.6.5 | Building Materials
sash windows | Quite good - Render, slate roofs, original timber |
| 2.6.6 | Subsequent Alterations | Porch and second entrance blocked up.
Signage. |
| 2.6.7 | No comments received in response to Consultation. | |
| 2.6.8 | <i>Recommend that the Swan Public House is added to the Local List</i> | |

2.7 Trolleybus Traction Pole, 241-243, Burlington Road.

Submitted by member of the public



The Fountain, 15:28 Trolleybus

on route from Burlington Road.



241-243 Burlington Road

- 2.7.1 Architectural Style Good - Standard cast iron traction pole, originally painted dark green.
- 2.7.2 Age and History Good - 1931. The Traction Pole supported the overhead wires for the Trolleybus routes 604 and 605 which ran from Wimbledon to Teddington and Hampton Court. This Traction Pole supported the overhead

wires for the last London Trolleybus, number1521, as it returned to Fulwell on the night of 8th. May 1962.

- 2.7.3 Detailing Good - Unusually it has part of the 'span wire' attached to pole which would have connected this pole to one on the opposite side of the road.
- 2.7.4 Group Value None - Originally the poles were all along the Trolleybus routes forming part of the biggest trolleybus system in the world at that time. But possibly this is one of only two Traction poles remaining in London
- 2.7.5 Building Materials Fair - Cast iron painted in dark green.
- 2.7.6 Subsequent Alterations Loss of globe finial on top.
- 2.7.7 No comments received in response to Consultation.
- 2.7.8 ***Recommend that the Trolleybus Traction Pole is added to the Local List***

2.8 The Vicarage, 16 Copse Hill

Submitted by Council Officer



David Rock, who designed the building in association with his colleague Robert Smart, is a distinguished contemporary architect who was president of the RIBA between 1997 and 1999. However, as the article by Catherine Croft makes clear, he is best known as a theoretician, particularly in terms of town planning and in the conservation and re-use of existing buildings, rather than as an innovative designer.

The brief for 16 Copse Hill was very specific in terms of spatial requirements, budget and future running costs. Importantly, it had to function as both a family home for the incumbent and as a meeting space for parish functions, and these two functions were to be kept separate in the interior design of the building. Constraints on the budget are implied in the article of the 6 October 1967 edition of 'Building' which states that 'The intention was to spend money on space rather than fittings'.

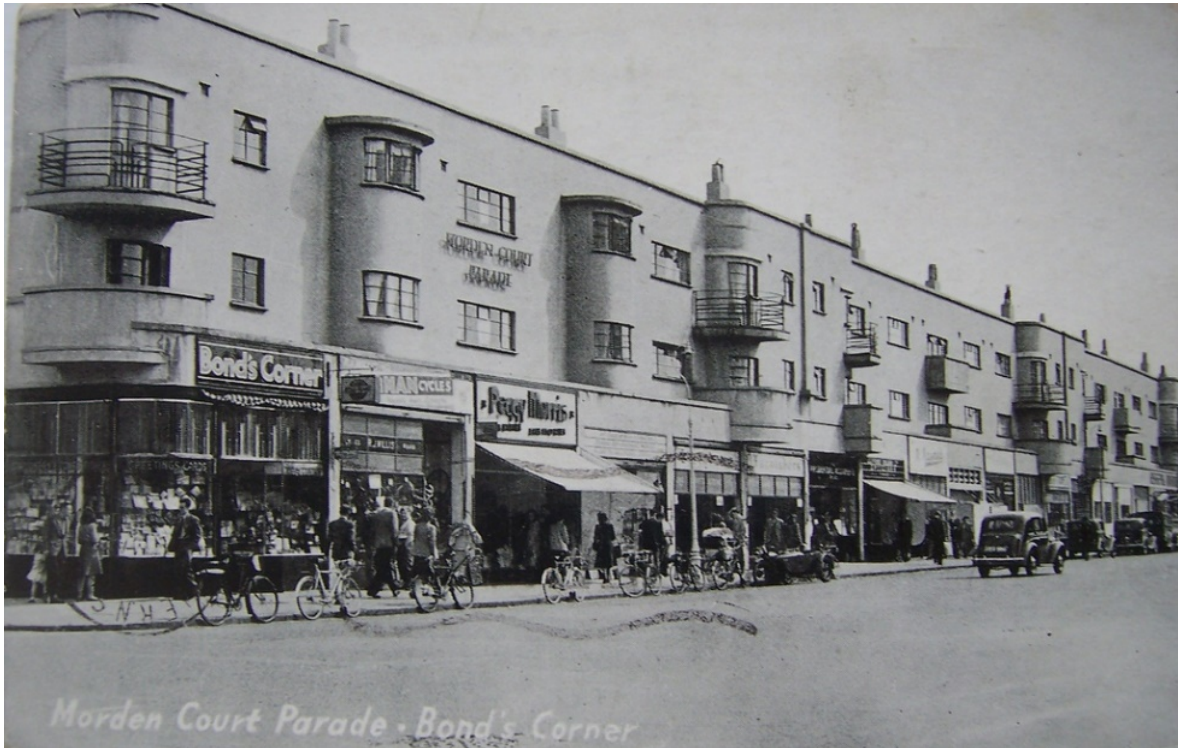
The building is largely unaltered externally although with some window replacement on the eastern elevation.

Internally the alterations are again relatively minor but the removal of the sliding screens between the public and private part of the ground floor has an impact on the understanding of the dual function of the building. In addition, the removal of some of the full-height doors has an adverse effect on the unity of the interior design.

2.8.1	Architectural Style	Fair - Modern style
2.8.2	Age and History and home	Good - Built 1967 as a vicarage
2.8.3	Detailing clad in copper	Quite good - roof and upper floors
2.8.4	Group Value	none
2.8.5	Building Materials	Block and copper. Timber frame windows. Wood panelling internally.
2.8.6	Subsequent Alterations	Minimal, some windows have been changed.
2.8.7	Comment stated that the previous vicar considered it 'the ugliest in Christendom'	
2.8.8	<i>Recommend that the Vicarage is added to the Local List</i>	

2.9 Morden Court Parade, London Road.

Submitted by Council Officer



Built in 1935, Morden Court Parade is a unique art-deco building which had been significantly and unsympathetically altered. Through a lack of maintenance and care, a once striking example of art-deco development had succumbed to a series of adverse changes to its structure and classic features, including the loss of balconies, loss of curved windows, unsympathetic extensions at the rear, and inconsistent facade texture due to ad-hoc approach to maintenance. The retail parade has suffered from an absence of definitive design-led intervention and management, resulting in a varied, inconsistent, and unfriendly retail parade featuring incongruous signage, obtrusive external roller shutters, and poorly configured advertisement hoarding. Morden Court Parade frontage has been now been restored funded by Mayor of London's London Regeneration Fund.

- 2.9.1 Architectural Style Good. Art Deco
- 2.9.2 Age and History Good. 1935 . Works have restored the retail (North facing) façade featuring; Completion of a high-quality shop-front improvement and shop-signage scheme Re-render finish at the upper levels Reinstated balconies.
- 2.9.3 Detailing Good. Characteristic curved end elevations. Iron balconies, curved windows
- 2.9.4 Group Value Relates to York Close at the rear.
- 2.9.5 Building Materials Good. Render
- 2.9.6 Subsequent Alterations Some windows on the front elevation are not the original metal style. Ad hoc extensions at the rear.
- 2.9.7 No comments received in response to Consultation.
- 2.9.8 ***Recommend that Morden Court Parade is added to the Local List***

2.10 20 Malcolm Road, SW19 4AS

Submitted by The Wimbledon Society.





This is a double-fronted private house near the top of Malcolm Road. The planning application for building it was submitted in 1896, the architect being Ernest H Abbott of 6 Warwick Court, High Holborn. It was built for C E Scrubby Esq.

In 1902 a fine conservatory was added to the right side of the house designed by the same architect. This was demolished in 2014.

In 1927 the house was bought by Capt. H C Nilsom who added a garage with a room above abutting the left side of the house. Its style is in keeping with the house. Capt. Nilsom called the house "End House". He is the author of "A Book of Remembrance for King Albert's Light Infantry Battalion 1914-1919". The book was compiled in conjunction with Major Goddard. The paperback version was published in 2009.

It was subsequently occupied by Mrs. White, a children's book illustrator, who lived there for approximately 40 years until her fairly recent death.

The house is built mostly of brick with some wood cladding. There is a mullion window with stone decoration under one of the eaves. The wooden front door has a roof above it with wrought iron-work supports. The door is inset with 4 large panels of stained glass.

The front hall is spacious with a fine open staircase running along the right wall up to an open ballustraded landing. Unfortunately Local listing does not protect interior.

The front boundary wall, about 1m. tall, has also been removed. (There is no planning record regarding this.)

This is the oldest typically Victorian house in the road with a great number of detailed original features. It must have been the top or first house in the road to be built before the grounds of Sunnyside House were sold off and later sub-divided and built on. Thus No.20 is next to No.26 which is part of this later development.

- 2.10.1 Architectural Style Originally a double fronted house consisting of four bays with three front facing gables. A further bay was added in the late 1920s. Although built in the late Victorian era it is more Edwardian in style influenced by 17th century classical . The architect was Ernest H Abbott.
- 2.10.2 Age and History Built 1896 for C E Scrubby. Later occupied by Capt. H C Nilsom author of "A Book of Remembrance for King Albert's Light Infantry Battalion 1914-1919. More recently it was occupied by Mrs. White, a children's book illustrator.
- 2.10.3 Detailing The gables have finely profiled render detailing. The largest gable has ornate classical detailed narrow openings above the two storey cantered bay whose roof is formed by rounded copper panels. The windows are original with attractive timber detailing. The front door has unusual stained glass panels.

- 2.10.4 Group Value None
- 2.10.5 Building Materials Fair-Poor. Red Brick, pebbledash, weatherboarding, clay roof tiles, stone mullions, timber frame windows, copper panels.
- 2.10.6 Subsequent Alterations Removal of conservatory and rear extension. Early addition of garage wing. Inappropriate timber cladding repair on bay.
- 2.10.7 Strong comment received from representative of the owner against Local Listing. Demolition refused.
- Wimbledon Society have shown concern regarding the damage done to the front elevation of the house.
- 2.10.8 ***Recommend that 20 Malcolm Road is added to the Local List***
- 2.10.9 **Note:** Since writing this report this property has been subject to deliberate actions by the owner to undermine its significance, for example, by bricking up openings, removal of the feature corner bay and porch. The original front door with stained glass panel can no longer be seen. The owner says that these steps were taken to secure the property. They also argue the demolition of parts was for safety reasons.

2.11 Street Lamp Standards, Bertram Cottages

Submitted by a Bertram Cottages resident



3 historic street lamps, Bertram Cottages.

- 2.11.1 Architectural Style Good. Style of electric street lamp introduced in 1930s to supersede gas lamps. It has retained its original lighting unit.
- 2.11.2 Age and History Good. Probably 1930s. Produced by Revo Electric Co. Ltd of Tipton Staffs. Fitted with Revo Symmetric Magnalite Lighting Unit as shown below.
- 2.11.3 Detailing Good. The design of the Cast Iron Lamp Standard is Hull which has a door in the base to house the switching gear. It has an ornate bead design above which is a vertical fern topped by another ring of beads.

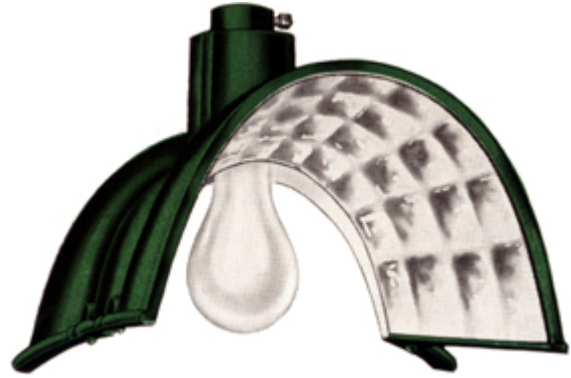
REVO "Magnalite"
(Patent applied for).

Silvered Mirror Directional Street Lighting Units,
comprising specially designed one-piece
faceted Silver Mirrors fitted into Metal Frames.

For 60 to 100 Watt Lamps.

(Size to be stated when ordering).

Tapped 3/4in. Gas.



Cat. No.	Beam Divergence	Price Each
C8572	2 way - 155°	29/-
C8570	2 way - 180°	29/-

These Fittings are designed for a spacing to
height ratio of approximately 8 to 1.

- 2.11.4 Group Value 3 still in situ.
- 2.11.5 Building Materials Good. Cast Iron Lamp Standard.
- 2.11.6 Subsequent Alterations Change of globe.
- 2.11.7 One letter of support.
- 2.11.8 ***Recommend that Bertram Cottages Street Lamps are added to the Local List.***

2.12 62, 64, 66, 70, 72, 74 & 76 Bathgate Road

Submitted by a Council Officer



No.62



No.64



No.66



No. 70



No. 72



No 74



No 76

A group of Arts and Crafts influenced houses with deep sweeping roofs, and some still have very special ornate leaded windows. These are cottages which are being subjected to inappropriate extensions by owners seeking larger homes. There are a few surviving in their relatively original state. By adding these houses to the Local List will help planners to preserve their important features.

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|--------|---------------------|--|
| 2.12.1 | Architectural Style | Good, Arts and Crafts |
| 2.12.2 | Age and History | Build 1933 possibly influenced by Brocklesby early work. Architects Annesley, Browning and Hiscock. Built by the notable builder G T Crouch Ltd. |
| 2.12.3 | Detailing | Tile hanging at upper floor, render and timber beams, brick chimney breasts and stacks. |

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|--------|---|---|
| 2.12.4 | Group Value | Yes, Strong |
| 2.12.5 | Building Materials | Clay Tiles, Brick, Breezeblocks, leaded lights |
| 2.12.6 | Subsequent Alterations | Both appropriate and inappropriate, loss of feature windows |
| 2.12.7 | One comment does not support local listing but considers at being in a conservation area should be enough protection.

Two letters of support but show concern that permissions already granted have caused harm. | |
| 2.12.8 | <i>Recommend that 62,64,66,70,72 & 74 Bathgate Road are added to the Local List</i> | |

2.13 Cast Iron Sewer Vent, Southside, Wimbledon Common.

Submitted by The Wimbledon Society



In 1887 the 'emission of foul smells' from some of the sewers was such that 'nurses were not allowed to take children within a hundred yards of them'; the smell came from older houses that did not have traps, thus letting odours into the drains. Santo Crimp, then the Council's engineer, devised ventilation pipes at key points. Other areas adopted these, and they became known as Wimbledon columns or stench pipes. The pipes were successful in venting the sewers, and ten more were added in 1911.

Charles Toase 2016

- 2.13.1 Architectural Style Wimbledon Stench Column.
- 2.13.2 Age and History 1887. Original ventilation pipe designed by Santo Crimp to control odours emitted from the sewers.
- 2.13.3 Detailing Ornate decoration typical of the period.
- 2.13.4 Group Value Five + others identified in the Borough
- 2.13.5 Building Materials Cast iron
- 2.13.6 Subsequent Alterations None
- 2.13.7 Strong support to list this vent.
- 2.13.8 Wimbledon Society supports the listing.
- 2.13.8 At their meeting on 4th June 2020 The Borough Plan Advisory Committee resolved to recommend that this item should be deferred to the next round of Local Listing as the landowner is currently unknown and may not have had the opportunity to respond to the consultation.

Recommend that the Cast Iron Sewer Vent, Southside is added to the Local List

2.14. Art Deco Commercial Buildings on Lombard Road, Lombard Business Park.

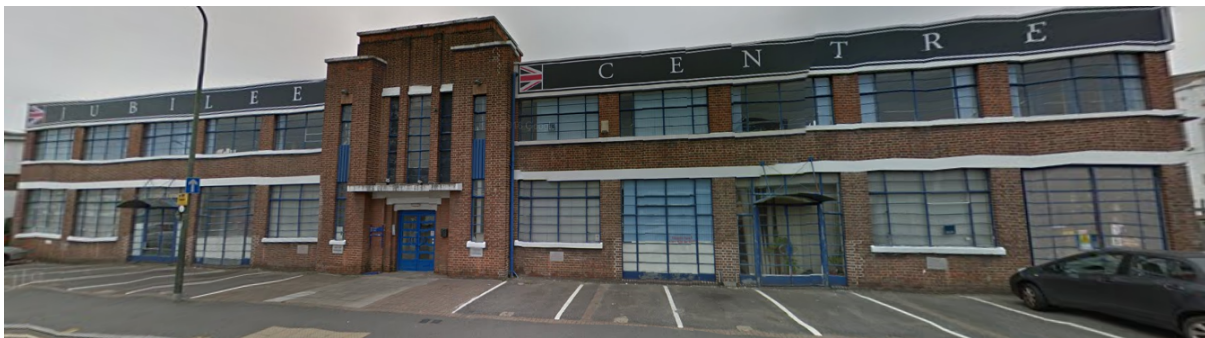
Submitted by a Council Officer



Lombard Business Park, 8 Lombard Road



Endecotts, 9 Lombard Road



Jubilee Centre, 10-12, Lombard Road



14 Lombard Road. (RAM)



17 Lombard Road (Screen Craft)



Globe House, 21 Lombard Road (Gym 1971)



Assist House, 25 Lombard Road. (Fitmay House)

The Lombard Trading Estate was previously known as Morden Factory Estate. It was mainly developed by Commercial Structures Limited. The G H Zeal factory building was built for G H Zeal in 1933. It is now known as The Lombard Business Park. Zeals, manufactures of thermometers, moved to a new factory in 1960s on Deer Park Road. Morden Factory Estate was famous its toy factories that made Triang Toys and Pedigree dolls but sadly these factories have been replaced.

These Art Deco factories that have been selected to be proposed to be added to the Local List have strong horizontal features and strong entrance porches representative of the era. The frontages of these buildings have been maintained and have remained much the same as they were originally built although unfortunately some have updated their windows. Some back sheds have retained their original form.

2.14.1	Architectural Style	Art Deco
2.14.2	Age and History Structures Ltd	Built in the 1930s by Commercial
2.14.3	Detailing	No.8, Strong horizontal white detail and tired pediment.

No.9. Original metal framed windows, impressive corner windows with white reveals facing the junction taking advantage of the corner site, strong white horizontal banding, soldier course above windows.

No.10-12, Original metal framed windows, strong horizontal banding, striking brick pillars on either side of the entrance, central brick tower and projecting porch, distinctive top band with name.

No.14, Corner window openings, horizontal banding, vertical concrete divisions separating windows, central brick tower with solid concrete quoins, suspended porch. No.17, Brown brick with contrasting banding in white lintels and sills, red brick soldiers and banding, black brick at ground level, light brick at roof level, red brick detail around entrance, interesting changes in width of window opening.

No.21, single storey corner site. Corner window. Contrasting concrete lintels, sills and copings, red brick banding above window lintels. Concrete porch.

No.25, Two storey, Strong contrasting concrete horizontal bands. Central porch with vertical window feature above.

2.14.4 Group Value Strong group value. A number of Art Deco factories in Lombard Road

2.14.5 Building Materials No.8, Brick, Render, concrete lintels.

No.9, Red brick, Metal windows, concrete lintels.

No.10-12, Red brick, concrete lintels, metal windows.

No.14, Brick and concrete.

No.17, Brown, black, light and red brick, concrete.

No.21 Red and Brown brick, concrete.

No.25 Mixed Brick, concrete.

2.14.6 Subsequent Alterations No.8, Windows changed, possibly porch added.

No.9, Entrances are not original.

No.10-12 no obvious changes.

No.14, windows changed.

No.17, windows changed.

No.21, windows changed, security grill fitted to front entrance.

No.25, possibly windows changed and original porch.

2.14.7

Strong support of listing these commercial buildings and suggestions for other buildings also to be considered.

One objection received regarding possible impact on value and concerns that local listing may restrict carbon footprint improvements.

Suggestion that 21 and 25 may not be of a standard to add to the local list.

2.14.8

Recommend that these Art Deco Commercial Buildings that face the street frontage are added to the Local List

2.15.

Mitcham Police Station, 58 Cricket Green, Mitcham

Submitted by Mitcham Cricket Green Community & Heritage



Distinctive office and civic building facing Mitcham Cricket Green Mitcham Police Station was opened on 18th June

1966 by Mayor of Merton, Sir Cyril Black. It cost £98,000 and over 3,000 members of the public toured the station and visited a special exhibition in the car park through the day. The police station is a distinctive London Stock brick building redolent of its time which sits easily alongside the diverse assemblage of buildings around the historic Cricket Green. Along with the Grade II listed Mitcham Methodist Church, the Police

Station represents the 20th century's additions to the variety of architectural styles and traditions around the registered town green.

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| 2.15.1 | Architectural Style | Good, Modern style of its time |
| 2.15.2 | Age and History | Built in the 1966s, designed by the chief architect and surveyor's department of the Metropolitan Police. |
| 2.15.3 | Detailing | Strong horizontal concrete detail at first floor and at roof level. Also contrasting concrete detail around the fenestration. The detail of the perimeter wall reflects the detail of the building. |
| 2.15.4 | Group Value | No direct group value but there is a relationship to other 20 th century buildings around the Cricket green including the Grade II listed Methodist Church. |
| 2.15.5 | Building Materials | Stock Brick, Concrete, Render, steel framed windows. |
| 2.15.6 | Subsequent Alterations | Changes to some entrances. |
| 2.15.7 | | No comments received in response to Consultation. |
| 2.15.8 | | At their meeting on 4 th June 2020 the Borough Plan Advisory Committee resolved to recommend that this item should be deferred to the next round of Local Listing as the information in this report relating to the current building (including the above photograph) needs to be updated to represent the current building proposed for local listing in 2020. |
| 2.15.8 | | <i>Recommend that Mitcham Police Station is added to the Local List</i> |
| 2.16 | Kellaway House, 326 London Road, Mitcham, CR4 3ND | Submitted by Mitcham Cricket Green Community & Heritage |



Distinctive dwelling facing the corner of Mitcham Cricket Green now used as a community building. The only Victorian villa remaining along this section of London Road.

- 2.16.1 Architectural Style Good: Late Victorian detached double fronted house with cantered bays at ground and first floor levels with arched windows. Rooms in the attic. Original two storey side addition. Prominent quoins on the front elevation in gault brick. A feature is made of the red brick front porch.
- 2.16.2 Age and History Good: Late 19th Century detached house which is last surviving building of what was a row of detached and semi-detached houses along London Road between the Upper and Lower Greens. The demolition of others made way for Glebe Court. 1968 planning records make reference to Citizens Advice Bureau offices on the upper floor. The Citizens Advice Bureau currently occupies the building.
- 2.16.3 Detailing Good and well detailed using gault brick to form corner quoins and horizontal strings. Windows have recessed arches with red brick detail with gault tooth detail above. Recessed porch is faced in red brick with contrast detail. Ornate brick mouldings form horizontal strings across the building, above the window arches and form part of the quoins. Deep eaves and simple bargeboards.
- 2.16.4 Group Value No group value.
- 2.16.5 Building Materials Gault brick, red brick entrance porch with stone detail. Red brick soldiers forming window arches. Slate roofs. Timber bargeboards. Original sash windows in good condition.
- 2.16.6 Subsequent Alterations No apparent major alterations to the exterior. Some windows may have been replaced.
- 2.16.7 No comments received in response to Consultation.
- 2.16.8 ***Recommend that Kellaway House is added to the Local List***

2.17 Local list assessment for 4 – 7 Upper Green West and 5-11 Upper Green East.

2.18 4, 5, 6 & 7 Upper Green West, Mitcham CR4 3AA.

Submitted by Mitcham Cricket Green Community & Heritage



Dated 1962



Victorian two storey parade of 4 shops with residential above.

Parade of four shops built prior to 1865. They are the oldest group of buildings on this side of the Fair Green. They were built as shops and remained in commercial use since then. They would have been built with traditional layout with shop at the front, parlour at the rear and the shopkeepers' accommodation above. It is a two storey parade with two storey rear wings sharing party walls. Double pitched slate roofs.

- 2.18.1 Architectural Style:** A simple parade of four small Victorian shops dating from before 1865s. Built in yellow stocks with red dressings forming the window arches. Red brick detail also evident around the central blind window.
- 2.18.2 Age and History:** Buildings of this age may qualify as being acceptable for inclusion in the Local List when they may be weak under other criteria. This parade is an example of small Georgian/ Victorian shops which would have been prevalent around Fair Green forming commercial and social hub of historic Mitcham.
- 2.18.3 Detailing:** Although there are no original shopfronts remaining there some original ornate pilasters are surviving. Possibly other shopfront features that could be revealed. The window openings at first floor level are as original. The windows above one shopfront have the original sashes. Unfortunately other windows have been replaced. The slate roof is possibly original. The chimney stacks and chimney pots are in place. The rear of the parade has much of its original structure, two storey rear wings and single storey additions with original slates roofs. Many of the sash windows at the rear are original. They have small panes in contrast to the windows at the front.
- 2.18.4 Group Value:** It has group value as a parade of four shops which can be clearly identified at first floor level and at the rear. The uniform slate roof ties the parade together with the rhythm of the chimneys. This parade does not relate to other parades nearby.
- 2.18.5 Building Materials;** Yellow stocks with dressings of red stocks are the main building material. There appear to be stone sills at both the front and rear. A number of original timber framed sash windows are in place. Shopfronts not original.
- 2.18.6 Subsequent alterations:** Inappropriate shopfronts and facia have been fitted. The advertising facia are not in the correct position, set too high and are oversized in proportion to the shopfronts. Two of the shops have painted the brickwork of their front elevation white.
- 2.18.7 Conclusion:** Having in mind that buildings earlier than 1850, and this parade may well fall into that category, should be considered more favourably against the criteria for local listing I feel that there is much original fabric remaining with exception of the shopfronts. It is very unusual to find original shopfronts in areas which have been subject to much change and commercial viability as this area has over time. Therefore to judge its historic value only

on the poor shopfronts would not be right. However the parade as it is not really up to the standard for locally listing. But I do consider that this parade could be eligible to be considered for investment and the parade be enhanced along with other parades in the Borough.

2.18.8 No comments received in response to Consultation.

2.18.9 ***Officers do not recommend that 4, 5, 6 & 7 Upper Green West are added to the Local List***

2.19. **5, 7, 9 & 11 Upper Green East, Mitcham CR4 2PE.**

Submitted by Mitcham Cricket Green Community & Heritage



1876 photo



July 2016 photo

Late 18th or early 19th century parade of shops with accommodation above

Parade of what is now two shops built prior to 1865. They may have originally been more than two shops here. They are the oldest buildings facing onto this side of the Fair Green. They were built as shops and remained in commercial use since then. It is a two storey parade with a two storey rear addition. It has double London roof set behind a small parapet. The double roof form can be seen from the Green. The roofs are tiled. It is possible that this parade and the Red Cross shop next door, previously a bank, could be part of a cluster of quite historic buildings but needs more in depth investigation.

- 2.19.1 Architectural Style:** A simple parade of two Georgian or early Victorian shops dating from before 1865s. Built in London Red stocks. Red brick soldiers form flat arches over what may be the original window openings on the front elevation. The front elevation is topped by a parapet which partly conceals the double London roof.
- 2.19.2 Age and History:** Buildings of this age may qualify as being acceptable for inclusion in the Local List when they may be weak under other criteria. This parade is an example of Georgian/early Victorian shops which would have been prevalent around Fair Green forming commercial and social hub of historic Mitcham. Among the oldest buildings in Mitcham Town Centre and makes historic contribution to the town centre and Fair Green. Long continuous use as shops with a social history of uses including 'take away pea soup', confectionary, tobacconists, song sheets, tailors and outfitters, cobblers and currently estate agents.
- 2.19.3 Detailing:** There are no original shopfronts remaining. It is unlikely that there are any shopfront features that could be revealed. The window openings at first floor level have been reduced in height to accommodate oversized shopfronts. The windows above the shopfronts have possibly retained the original width but have replaced with inappropriate windows. The tile roof is original. The chimney stacks are in place but no chimney pots. The rear of the parade is difficult to access but may have original structure.
- 2.19.4 Group Value:** It has group value as a parade of shops which can be clearly identified at first floor level. The uniform tiled roof ties the parade together. This parade does not relate to other parades nearby.

- 2.19.5 Building Materials;** Red London stocks. There appears to possibly be stone copping on the parapet. No original windows are in place on the front elevation. Shopfronts not original.
- 2.19.6 Subsequent alterations:** Inappropriate shopfronts and fascia have been fitted. The advertising fascia are not in the correct position, set too high and are oversized in proportion to the shopfronts and the building in its entirety.
- 2.19.7 Conclusion:** Having in mind that buildings earlier than 1850 and this parade may fall into that category should be considered more favourably against the criteria for local listing I feel that there is original fabric remaining with exception of the shopfront. It is very unusual to find original shopfronts in areas which have been subject to much change and commercial viability as this area has over time. However the alterations to the front elevations of these shops are totally unsympathetic. There are elements of historic value, the London roof for example. But to consider the parade as a whole it is difficult to establish how much original fabric remains. It makes a contribution to the social history of Mitcham Fair Green but I feel as it stands in its current condition without investment it is not a contender for addition to Merton's Local List at this time.
- As stated before these may well be Georgian buildings with other adjoining buildings could be historic cluster of commercial buildings which with investment could become a focal point around the Fair Green.
- 2.19.8** No comments received in response to Consultation.
- 2.19.9** ***Officers do not recommend that 5, 7, 9 & 11 Upper Green East are added to the Local List***

3. ALTERNATIVE OPTIONS

- 3.1** The alternative option for the purposes of this report is for the Borough Plan Advisory Committee to advise full council of alternative recommendations than those recommended in these locally listed buildings and structures

4. CONSULTATION UNDERTAKEN OR PROPOSED

4.1 Consultation letters were sent to the individual residential properties informing the owners that their property was proposed for addition to the Local List during August 19 . Their comments were invited and any additional information was welcome. The draft report was presented at the Heritage Forum on 23 April. August and early September similar consultation letters regarding structures within the public realm were sent to relevant council officers and community groups. Consultation via the website was from 16 October until 14 November 2019.

4.2 On 4th June 2020 the Borough Plan Advisory Committee considered the report on locally listed buildings. BPAC resolved to recommend all of the officer’s recommendations to Cabinet that are contained in this report apart from the following:

- *The Cast Iron Sewer Vent, Southside, Wimbledon Common.* The Borough Plan Advisory committee resolved to recommend that this item should be deferred to the next round of Local Listing as the landowner is currently unknown and may not have had the opportunity to respond to the consultation.
- *Mitcham Police Station.* The Borough Plan Advisory Committee resolved to recommend that this item should be deferred to the next round of Local Listing as the information in the officer’s report needs to be updated to represent the current building as at 2020.

Process for Local listing in Merton

4.3 During April and May 2016 it was resolved by BPAC and council to change the process for assessing locally listed buildings. This report is the second report to be received under the new process. The new process is set out as follows:

Recommendations received annually from anyone (residents, officers, businesses etc) for buildings or structures to be listed	<i>No change to process</i>
Merton’s conservation officer assesses the buildings and structures against Merton’s Locally Listed Buildings criteria and writes a report for each building / structure, recommending inclusion or rejection on the Local List.	<i>No change to process</i>
The buildings / structures and the officer’s report is published on the council’s website for consultation for 4-6 weeks	<i>New element</i>

Officers finalise the report and recommendations, considering the consultation feedback. If consultation reveals something that has been missed in the assessment, officers will re-assess.	<i>New element</i>
The officer's final report and the consultation response summary are considered by the Borough Plan Advisory Committee who then make a recommendation to full council via Cabinet	<i>New element</i>
Recommendations to include or reject the buildings / structures for the Local List are resolved by full council	<i>New element</i>

5 TIMETABLE

- 5.1 The next steps will be to take the Borough Plan Advisory Committee's recommendations to full council at the next available opportunity.

6. FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1 The property implications are set out in the body of this report. This work has been prepared within the council's existing resources.

7. LEGAL AND STATUTORY IMPLICATIONS.

7.1 There is no statutory requirement for councils to hold or maintain a Local List.

7.2 However their status is relevant when considered through Merton's Local Plan (Core Planning Strategy policy CS14 and Merton's Sites and Policies Plan 2014 policy DM D3) and therefore in the discharge of Merton's statutory functions as a Local Planning Authority.

8. HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1 None for the purposes of this report.

9. CRIME AND DISORDER IMPLICATIONS

- 9.1 None for the purposes of this report.

10. RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1 None for the purposes of this report.

APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

1. None

Cabinet

Date: 15 June 2020

Wards: All

Subject: Merton Insurance Contract 2020-26

Lead officer: Caroline Holland

Lead member: Cllr Mark Allison

Contact officer: Roger Kershaw

Recommendations:

- A. To approve the award of Merton Insurance Contract 2020-26 to Bidder E (Lot 1,2 and 3) and Bidder C (Lot 4) for an initial period of 3 years 7 months years with the option to extend for a further 2 years
- B. To delegate authority to the Director of Corporate Services, in consultation with the Lead member for Finance to approve the extension of this contract, if required from April 2024 to March 2026.

Exempt or Confidential Report

The following paragraph of Part 4b, Section 10 of the constitution applies in respect of information within this report and it has therefore been placed in an appendices 1 and 2.

Information relating to the financial or business affairs of any particular person (including the Authority holding that information).

Members and officers are advised not to disclose the contents of the appendices.

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. This report sets out the proposed contracts to be awarded for the London Borough of Merton insurance contracts for Property, Liability, Motor and Travel with the commencement date of 1st September 2020.
- 1.2. The tender involved a detailed joint procurement process in conjunction with the Council's retained insurance brokers (Marsh) and with close engagement of Commercial Services to ensure the Council's requirements were fully incorporated.
- 1.3. The over-arching aim of these tenders was to put in place appropriate insurance cover for the Council and its residents and achieve financial efficiencies in the process of arranging the cover.

2 DETAILS

- 2.1 The Council ran a further competition using the ESPO/YPO Framework to carry out this procurement. The evaluation criteria was based upon a weighting of price 60% and quality 40%, as detailed below.

Criteria	Weighting
Price for Insurance cover	60%
Assessment of Policy Cover	20%
Claims Service	10%
Added Value and Innovation	10%

- 2.2 The tender had 4 lots. These are detailed in the table below together with the number of offers received.

Lot	Lot Description	Number of Offers
1	Property	4
2	Liability	4
3	Motor Fleet Insurance	3
4	Travel	1

- 2.3 The evaluation, scores and outcome of the evaluation is set out in the confidential appendix 1 – Tender Evaluation.

- 2.4 The evaluation recommendations were agreed upon and the following table shows who was awarded each lot, on the basis that their tender was the most economically advantageous to the council, based upon the scores for both price and quality.

Lot	Lot Description	Award to
1	Property	Bidder E
2	Liability	Bidder E
3	Motor Fleet Insurance	Bidder E
4	Travel	Bidder C

** A list of each bidder is contained in Appendix 1.*

3 ALTERNATIVE OPTIONS

- 3.1. Self-insurance is an option but it carries unknown levels of risk and although we already adopt a measure of this currently the tenders received have demonstrated that, at this stage, there is no financial benefit from increasing our excesses for this batch of insurance policies.

Option	Advantages	Disadvantages
1. Do nothing	None	The current provider's premium would be higher, the spend would be non-compliant. There would be no achieved value for money as the expenditure on the insurance broker would be a waste. Public expectation is that their council would deliver responsive solution, this would be damaged.
2. Re-procure using an open tender	Access to wider market	Very long process demanding additional time and resources. The market would be with the same suppliers there would be no benefit achieved.
3. Bring the service In-House	Possible saving on premium	Need additional resources and expertise, and office facilities would be required. Need to increase the self-insurance significantly. May not be possible to meet any catastrophe loss- if a large scale event were to occur there would be no guarantee that such a loss could be met.
4. Let the contract terminate and not re-let	None	Reputational damage. Unable to do business with our stakeholders. Exposed to unlimited risks.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1 The insurance team have worked with Commercial Services along with the Council's insurance brokers Marsh. Legal advice was obtained from the South London Legal Partnership and Bevan Brittan on the framework terms and conditions together with the policy wordings.

5 TIMETABLE

- 5.1 The proposed timetable leading to commencement date is shown in the table below:

Activity	Start Date
CMT	26/05/2020
LSG	01/06/2020
Cabinet Meeting	15/06/2020
Internal call in period	16/06/2020 – 23/06/2020
Intention to award letters sent to Bidders	24/06/2020
Standstill Period	25/06/2020 – 06/07/2020

Confirmation of Award letters sent to Bidders	07/07/2020
Mobilisation Period	10/07/2020 – 31/08/2020
Service Starts	01/09/2020

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

6.1 The insurance budget for the council is managed centrally with a budget allocation in 2020/21 of £699,880 for insurance premiums, IPT and claims handling which is reflective of a £50,000 saving (2018-19 CS07) agreed from 20/21.

a) Financial background

Insurance premiums are subject to insurance premium tax; annual index uplifts on premiums of average earning index on fees and BCIS on property insurance policy. These are expected to continue to increase.

Insurance premiums are also subject to change. An annual renewals process is undertaken; market and risk factors could lead to an increase or decrease.

7 LEGAL AND STATUTORY IMPLICATIONS

7.1 The Council has power under section 1 of the Localism Act 2011 to enter into contracts for the provision of insurance cover to protect its assets, liabilities and risks.

7.2 The contracts have been procured in an open and transparent manner in line with the requirements set out in the Public Contract Regulations and CSOs. Contract award notices will need to be issued.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

8.1. None

9 CRIME AND DISORDER IMPLICATIONS

9.1. None

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

10.1 The Covid -19 pandemic and the potential future risks were clarified with the insurers as part of the tender. Due to the uncertainty of the COVID 19 none

of the bidders accepted this as a new risk. However the Merton Insurance Fund is adequately funded to meet any Covid 19 related claims if they arise.

11 APPENDICES – THE FOLLOWING DOCUMENTS FORM PART OF THE REPORT BUT EXEMPT FROM PUBLICATION

- Appendix 1 - Full evaluation scoring details
- Appendix 2 - Tender evaluation report from the insurance broker – Marsh

12 BACKGROUND PAPERS

None

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of the Local Government Act 1972.

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