



THE JOHN INNES SOCIETY

For Conservation in the John Innes Estate at Merton
Registered Charity No. 803759

Sadiq Khan, The Mayor of London
New London Plan,
GLA City Hall,
London Plan Team,
Post Point 18,
FREPOST RT JC-XBZZ-GJKZ
London
SE1 2AA

Please reply to



E-mail: mail@johninnesociety.org.uk

26th February 2018 .

Dear Mayor Khan,

The Draft London Plan 2018 – Consultation.

The John Innes Society is a Charitable Amenity Society located in Merton Park, in the London Borough of Merton. Our comments set out below are of necessity based on our own knowledge, experience and local area, and we have not attempted to comment on all policies or Chapters of the Draft London Plan.

We would like to make the following comments and objections:

CHAPTER 1 AND GENERAL POLICIES:

GG1 We broadly support this policy but object to

1.2.2 a stricter definition of “appropriate location” is needed. Who should decide what is an appropriate location? We consider it should be the Local Planning Authority.

1.2.3 this clause should stipulate the necessity to identify simultaneously sites for the provision of housing and social infrastructure, especially those requiring larger sites, such as schools and health care facilities. We say this because we can already see that our own Local Authority, Merton, is designating every site as it becomes available for more housing, which leaves no land left for all the other infrastructure needed for an expanding population.

GG2 We support policies A, B, C, E & F and but object to D unless gardens and private gardens, are added to the list of open spaces to recognize their importance for bio diversity and to avoid fragmentation of habitat.

GG3 We broadly support these policies but object to G3 G unless “including and protecting and promoting allotment gardens” is added at the end of that policy.

GG4 We broadly support these policies but consider the word “ambitious” is unnecessary in GG4 E. Being “achievable” is what is important.

GG5 We object to GG5 C as drafted. We think it should say “plan for sufficient employment, commercial and industrial space in the appropriate locations (*see 1.2.2.above*) to support economic development and regeneration and encourage local employment.

We object to GG5 F because there is often conflict between heritage and 24 hour city implications. We propose re-wording GG5 F to read “promote and support London’s rich cultural assets and its role as a 24 hour city except where that would cause harm to heritage and interests of acknowledged importance.

GG6 We broadly support this policy.

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CHAPTER 2. STRATEGIC DEVELOPMENT AREAS OVER NEXT 10 YEARS. WIMBLEDON OA AND CROSSRAIL 2.

Wimbledon is the nearest Town Centre to most of Merton Park but the proposals for Crossrail 2 so far, both to the Town Centre and its hinterland, have been far more damaging than justified by the longer term benefits.

For this reason we object to 2.1.25 as drafted. The promotion of Crossrail 2 in and around Wimbledon must not be at any cost. We are extremely interested in the latest suggestion that Crossrail 2 should start from Clapham Junction, as that would provide much better connectivity to a wider area than starting it from Wimbledon as well as reducing the project costs considerably.

TOWN CENTRES

We broadly support Policy SD6 (especially 1-4) but would like to see greater emphasis on the word **local identity in SD6 4** with the aim of avoiding so many town centres becoming standardized clones that could be anywhere, here or abroad.

SSD7, SD8 and SD9 - we broadly support these policies.

CHAPTER 3 DESIGN

D1. We broadly support these policies but object to D1 B 4 unless it reads “respects the established character of the area and enhances and utilizes this character, heritage assets and architectural features that together make up the local character”.

3.1.10 We strongly support this policy.

D2. We broadly support these policies but object to D2A6 unless it reads “open space networks including gardens and private gardens, green infrastructure and water bodies”.

D3 We support these policies.

D4 - HOUSING STANDARDS.

PRIVATE INTERNAL SPACE AND PRIVATE OUTDOOR SPACE

1-10. We strongly object to these standards as being inadequate and unlikely to achieve the healthy, happy city the London Plan claims to be aiming for. Having reviewed just how small these minimum standards are, at a time when the general population is increasing in stature as a result of adequate nutrition and medical care, we consider Parker Morris “decent housing” standards should be applied as the minimum. We appreciate not so many “units” can be achieved by insisting upon larger sized rooms and facilities, but over concentration on achieving the highest possible density of “units” will not outweigh the longer term health and wellbeing benefits of building better quality housing as “homes”.

We support S 4 Policies E, F & G. and Policy D5.

Policy D 6 DENSITY AND INFRASTRUCTURE

We object to D6 .C These thresholds are far too high. Density on the levels set out in 1,2 and 3 are a recipe for town cramming on an alarming scale and will result in damage or even destruction of interests of acknowledged importance and local character. Management Plans should be submitted in all cases where the proposed density is greater than the traditional density of the site location as it is more than likely the existing infrastructure, including social infrastructure, will not be adequate to support the new development. All necessary new infrastructure must be provided before any occupation of the new development.

Policy D7 We generally support this policy but Policy D7 H should make it clear that chemical pollutants should

not be used on green infrastructure in the public realm.

Policy D8. TALL BUILDINGS.

We object to Policy D8 C.d. "Harm", in any location, and not just from tall buildings, is never acceptable unless it can be demonstrated that it will be outweighed by a much greater measure of benefit. The traditional planning criteria that developments should be refused where they cause "harm to interests of acknowledged importance" should be the standard.

We strongly support D8.4 a (cumulative impact policy.)

CHAPTER 4 HOUSING.

H1 AND TABLE 4.1 and 4.2.5

We strongly object to the new housing target for the London Borough of Merton. An increase of 223% above our current target of 411 new homes pa is not justified by the predicted population increase of 13% for our Borough. We query the methods used to calculate this increase as it appears to count Tram Stops as stations. Requiring high density development within 800 metres of "stations" would decimate the local character of Merton Park (most of which lies within 800 metres of such stations.) Merton Park, together with Bedford Park, are part of London's heritage, being the first Garden Suburbs. Our Area of Benefit includes several Conservation Areas and Listed Buildings, both Nationally and Locally Listed. The green and open character of a "Garden Suburb" contributes to improving air quality and biodiversity and is a London lung. At a public meeting in Merton in January, Cllr. Jules Pipe, Deputy Mayor for Planning at the GLA said there is to be "no building on back gardens". This statement cannot be reconciled with the Housing Policies in the London Plan and the targets for Boroughs like Merton.

We strongly object to Policy H2 (Small Sites) and especially to H2.E (presumption in favour of small housing developments) for the same reasons as we have set out above in our objections to Policy H1. Where Local Character is of acknowledged importance for heritage, health and wellbeing, then each application should be considered on its merits. There should be no presumption in favour of development. The 800 metres policy is far too rigid and needs substantial refinement as otherwise it will result in developments being imposed on an area without due consideration of the harm they will cause. It will make other policies in the London Plan, for a healthy and happy city, impossible to achieve.

4.2.7. We object to this Policy as drawn as it will not provide sufficient protection to Conservation Areas. In Merton Park, as well as beautiful buildings, we also have beautiful and health giving open spaces, identified by Planning Inspectors as "oases of tranquillity". There need to be strong policies against intrusive new development which will destroy the character the Conservation Area status is designed to protect.

CHAPTER 5 – S1 SOCIAL INFRASTRUCTURE

The Policies are broadly supported but **we object to any suggestions that infrastructure should follow the development.** Social Infrastructure of all kinds, with land allocated to it from the outset, should be an integral part of and development strategy and should be available by the time the first new homes are occupied.

4.5.6 Cash in Lieu Contributions are being used by Local Authorities to allow developments which do not accord with policies about adequate provision of social infrastructure and affordable housing. All too often, alternative sites are not available which results in under provision. Alternative sites must be identified (with planning permission) before any Cash in Lieu Contributions are agreed.

S5 Sport

A. This policy should have the words "to meet future need" after the words "sufficient supply" in line one.

CHAPTER 8 GREEN INFRASTRUCTURE AND THE NATURAL ENVIRONMENT.

We strongly object to Policy G4 C and D. Local Green Spaces.

The loss of Green Spaces should always be resisted, not just in areas of deficiency. Otherwise a presumption will arise that loss of Green Spaces (which category should include private gardens) is acceptable until the deficiency limits are reached. That would be a race to the bottom and result in irrevocable harm to health and bio-diversity.

We support Policy G5 – Urban Greening.

We object to the last sentence of Policy G6. A. It gives the assumption some SINC's should not have as much protection as others.

We support Policy G7. Trees and Woods - but suggest there should be encouragement for Local Authorities to make more use of TPO's especially when there is a potential for development, rather than waiting for trees to become under threat from a development application.

CHAPTER 9 AIR QUALITY.

We generally support these policies but feel that greater emphasis should be given to reducing air pollution from building works on all developments, large or small, both during and after construction. Air quality conditions near schools and health care facilities needs greater protection. Air pollution from sources other than traffic, needs to be given greater attention.

CHAPTER 10 TRANSPORT.

Policy T1 A1 does not give sufficient recognition to the needs of people with limited mobility. In particular as people age they are unable to live independent lives if they do not have appropriate forms of transport available, leading to isolation and loneliness.

10.1.4. Re-balancing the transport system must take into account the mobility capability of everyone, not just the fit who can walk or cycle. All stations (tube, rail and tram) should have set down and pick up facilities, step free access and public transport of all kind needs to avoid "mind the gap" hazards.

T2 HEALTHY STREETS.

These policies are broadly supported but street widths need to be increased, especially between tall buildings, to avoid dark and windy concrete canyons. Street trees will not thrive in narrow, overshadowed conditions. Like people, trees need light, air and water. Wherever possible, tree lined boulevards style streets should be created. Developers should be required to set back new building to allow for wider pavements, tree planting and landscaping.

T6 CAR PARKING AND SERVICE DELIVERIES.

We are broadly in support of these policies especially B, E, F and G. On F, as people forgo private transport, their needs for deliveries will increase and all new developments, large or small, should be required to take this into account from the outset. Service delivery areas should be designed so that there is no noise nuisance to local residents and located so they do not obstruct access. Provision should also be made for access for emergency vehicles including mobility transport.

T6.1 C. We support the provision of charging points in all parking provision.

10.6.9 We support the recognition that people with limited mobility should have a genuine choice of housing and adequate disabled person's parking should be provided with all new residential developments, whether large

or small.

10.6.10 Provision should be made for the transport needs of support staff and visitors to avoid those with limited mobility becoming isolated or neglected.

CHAPTER 11 INFRASTRUCTURE

HEALTH FACILITIES

We broadly support these policies. It is unrealistic to continue with the current situation of reducing A&E, Maternity Units and Hospital Bed capacity while at the same time planning for an increase in population. Section 106 contributions need to be viewed with care, as there is no point in collecting money when there are no sites for new facilities. Transfer of land is a far better alternative. (11.1.38).

UTILITIES

11.1.42 We support the provision of heat networks.

11.1.43 We support the statement (which appears far too late in the London Plan) that “Investment ahead of demand will be required to ensure that the utilities are available when the sites are developed”. This should have been in Chapter 1.

GREEN INFRASTRUCTURE

We support 11.1.45 but in 11.1.46 suggest SUDS should be made obligatory for all developments, both public and private.

WASTE AND CIRCULAR ECONOMY INFRASTRUCTURE

We broadly support 11.1.5 – 11.1.53.

CULTURAL INFRASTRUCTURE

We support 11.1.57 but S.106 contributions should be used with care and only taken where on-site provision or direct sponsorship is impossible. Where S106 money is required then the site or facility to be benefited should be identified and safeguarded at the same time.

Yours sincerely,

Alison Cousins and Desé Child Co-Chairs.