

Spencer S &P

Dear Future Merton,

Merton's Local Plan online Consultation was completed and submitted yesterday . Unfortunately no email acknowledgement has been received to date, confirming that the online Questionnaire has been completed successfully and received. In case you have not received the completed Survey, please find below, for consideration, the comments and reasons given, in response to policies contained within Merton's comprehensive and highly commendable Local Plan.

We look forward to receiving a confirmation receipt for the online Questionnaire, in the near future.

Many thanks,

Merton Local Plan online Response submitted 31.01.21

Vision, Objectives and Good Growth 02

The objectives as set out in the new Local Plan, whilst commended for acknowledging Merton's Climate Emergency commitment, should prioritise Climate Change and protection of all green open space and wildlife, followed by energy, sustainability and the environment, then further greening of the Borough, and finally growth/development. SINC/Green corridor sites should be protected from development, and a priority given to planting street trees, creating biodiversity corridors and increasing tree canopy 10% by 2030. Housing needs to be prioritised over office space and housing requirements need to be reassessed post covid.

For the growth areas in particular, a commitment should be included for the preparation of a strategy of proposed off-road, pedestrian & cycleway networks prior to any future development taking place, to ensure they are effectively incorporated into the site layouts when development is designed. The links between vehicular use (even electric ones) and air pollution is proven and Merton should further discourage their use through regulating number of parking permits per household, reducing CPZ zones, pavement parking, and through transferring road space to safe cycling infrastructure and pedestrianised centres.

Colliers Wood N3 .1

3.1.5 The new public square is a bleak, unwelcoming space with poor air quality and would benefit greatly from the Urban Greening described in the London Plan (London Plan 8.2.5), to improve greening, canopy protection & pollution, through the planting of street trees and hedging, rather than grass and planters.

Mitcham Policy N3.2

Mitcham residents and local community organisations need to be listened to and views respected with regard to protecting green spaces, Conservation/SINC/ green corridor & heritage sites from development , including the felling of mature trees.

Morden Policy N3.3

Active travel and urban greening, including planting of street trees creating biodiversity links, and provision of open spaces to sit and relax should be prioritised in Morden Town Centre. This should be facilitated by the relocation of the bus station.

Raynes Park Policy N3.4

Rethink objectives to prioritise Climate Change, improving air quality and mitigating flood plain risks, through immediate planting of street trees along Town Centre Coombe Lane and Kingston Road.

Urgent need proposals for encouraging active travel, creating improved pedestrianised areas, safe cycling infrastructure and better links between the two shopping areas.

Prioritise:

- better enforcement/monitoring on SUDs & flood prevention measures
- more protection for existing trees and clearer policies on tree replacement
- more protection for MOL, SINC, green corridor, TPO's
- strengthening guidance on limiting height of buildings

South Wimbledon Policy N3.5

As a highly unsafe, congested and polluted Centre, an additional proposal to prioritise pedestrian, safe cycling infrastructure & bus routes along Merton road, by redirecting through traffic along Merantium Way, would help to transform South Wimbledon. The planting of more street trees along main roads, creating an increase in tree canopy cover, and biodiversity corridors should also be prioritised.

Wimbledon Policy N3.6

The views of local residents and local community organisations need to be respected and listened to.

Town Centre tall buildings should be restricted to 6 storeys.

Street Trees need to be planted along the Broadway, as a priority, creating canopy cover and biodiversity corridors between pocket parks. CCTV cameras, underground utilities and pedestrian crossings should be positioned as a secondary priority ie rerouted if necessary.

Pedestrianisation and safe cycling infrastructure should be allowed space and made a priority over through traffic in Wimbledon Town Centre.

Housing Provision: H4.2

There appears to be a major problem trying to accommodate this amount of new housing, ie more than 13.000 homes by 2035 and the implications are not shown.

Current tensions are already appearing where planning applications for developments on protected SINS/Green corridor and flood risk sites are being granted.

Accordingly, the inclusion of this high figure in a Local Plan is not yet demonstrated to be practicable, and residents are presented with an unexplained fait accompli, when housing needs, as a result of the current pandemic, require reassessment on a year by year basis.

Place Making & Design: D5.1

Buildings in town centres should be limited to 6 storeys and the need for office space reassessed post covid. Very tall buildings are disliked by Residents and local community groups for good reason: they are dominating, overbearing and dehumanising for pedestrians & cyclists negotiating spaces left. Wind tunnels are created and habitats for trees and wildlife are threatened.

a), i) & iii), should include retention and protection of existing trees in addition to the planting of new trees .

v), should include significant and veteran trees as Merton heritage assets. 'Heritage' trees in the borough and other significant trees in Conservation areas should be TPO'd

viii), requirement to avoid undermining design, requires specific mention that trees need to be planted in the ground, (not in planters), and underground utilities relocated to accommodate at an early design stage.

Clear reference needed to the ecosystem/wildlife/biodiversity environmental benefits of trees as well as their 'amenity value'. Developments should be required to result in a net increase in tree canopy cover, with specific reference to London Plan and Merton Tree Strategy .

Urgent priority should be given to the retention and protection of existing trees, if tree canopy is to be sustainably increased. Existing trees are currently undervalued in arboriculture assessments, where mature trees are insufficiently replaced with saplings. Many new trees and years are required to replace the ecosystem and amenity benefits of a mature tree and there is also the loss of tree canopy cover while new trees attain the size of the tree felled. Implementation of London Plan advised CAVAT & Eco i-tree assessment tools urgently requested.

Urban Design and the Public Realm Policy D5.2

g) Tree planting, as part of changes to & enhancement of highways & the public realm, should be supported by highways engineers, to include more trees and redirect utilities to accommodate planting (included in the cost of development or road improvement works). In addition there is a solution to avoid cluttering streets with parking signs by the adoption of low level signs at the back of footpath.

Traditional locations for trees i.e. opposite or in line with party walls in residential streets, needs protecting, with public signage placed elsewhere.

j) Reference to conversion of front gardens for vehicle parking/large refuse bin storage, should be strengthened & monitored for direction/guidance of residents and developers. Paving should be limited to enable existing trees/shrubs to be retained or planted with run off directed to soft areas, not drains.

Development near MOL and open/green spaces should comply with the same standards as for residential, on privacy distances, daylight and sunlight protection. Shadowing and overlooking compromise open space use.

Design Considerations in Developments D5.3

Merton's tree protection Policy is welcome but mature tree and canopy loss is currently being witnessed through current planning application arboriculture assessments, where felling of mature trees and supporting wildlife habitats are insufficiently replaced. London Plan advised use of CAVAT and Eco i-tree assessment tools are urgently sought to halt loss.

D5.3.27, landscape planning conditions should include a maintenance plan and replacement of failures within 5 years to ensure trees and shrubs establish properly. This would improve sustainability, tree canopy cover and bio-diversity as well as amenity benefits.

5.3.28, Should include the use of waste water for trees and other planting, re climate emergency.

Alterations and Extensions to Existing Buildings D5.4

Whilst 'respecting' & 'complementing' the original building & 'protection from visual intrusion, noise and air pollution' is commended, current decisions at planning application stage, need to more closely reflect policy re extensions built in brick not blockwork, conversions set back, not flush with rear wall, respecting neighbouring roof features etc. Re Climate change, request monitoring and regulation of current trends to reduce available rear private garden space, in 'maximising space', replacing trees and plants in rear gardens with extensions and outbuildings.

Managing Heritage Assets D5.5

Please include 'Heritage' trees to be retained, protected and celebrated.

Basements and Subterranean D5.10

Disallow basements in terraced homes, since they cause damage & subsidence to neighbouring homes.

Green Infrastructure and Nature Conservation 8.01

Whilst the measures outlined to protect and expand on open spaces, green infrastructure and the natural environment are supported, serious concerns remain : while Merton makes the right statements in relation to the climate emergency it does not act on them. Recent tree felling goes directly against the aims stated in this section. Felling mature trees is damaging to the environment and planting saplings that will create the same area of canopy or absorb the same amount of CO2 for 50 years, is not an alternative. Trees protected in sites of recognised nature conservation (SINC) and Green corridors, or through Tree Protection Orders were not protected at Mitcham/ Bishopsford Bridge, Wyke Road, Cricket Green Conservation area or 5 Parkside Avenue.

08.03 Biodiversity:

It is impossible for any proposed development, 'in and adjacent to Green Corridors' to 'enhance their nature conservation value.' Biodiversity Assessment tools need to be updated and used, in line with London Plan Policy, to fully register the loss of a wildlife habitat/ecosystem created by trees growing in a wild setting. When these trees are felled, a significant loss in wildlife/biodiversity occurs which cannot be replaced via a few bat boxes or green roofs.

1.1.28. 'Development proposals which are likely to affect sites that have been designated on the Policies Map as SSSI, SINC, LNR or Green Corridor will be required to demonstrate that such development will not adversely affect the nature conservation values of the site. Any proposals on adjoining sites will also need to ensure and demonstrate that the proposed development will not harm the nature conservation value of the designated site.' Any development in such protected areas, will adversely affect the nature conservation value. This is why these areas are protected. Merton urgently needs to provide officers and Councillors with training in biodiversity issues.

08.04 Tree Protection:

1.1.54 Where planning proposals involve curtailing the roots or canopy of retained trees, a higher level of care needs to be ensured by valuing such trees for replacement, if they should die within a time limit of say 2 years.

Again, a higher level of care can be ensured in the planting and maintenance of replacement trees, by requiring replanting of dead trees within an appropriate time frame.

If special mitigating conditions are a requisite to planning consent, an officer should be designated responsible for ensuring that these conditions are formally recorded and carried out within a reasonable time frame.

1.1.55 The London Plan advises the use of CAVAT, I-tree Canopy Eco UK and OSCCA as assessment tools for PA Arboriculture assessments. Use of these tools when assessing loss and harm, are urgently requested, to encourage tree retention and canopy increase.

1.1.56 When a decision is made by Merton, to cut down trees as part of permitted development, the full evidence for this decision should be made public and readily available, as are any mitigating conditions and a suitable time frame given for replanting.

Urban Greening 08.06:

The London Plan includes greening of all urban spaces:

'8.5.2 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.'

This wider interpretation of Urban Greening should be included in Merton's plan. The crucial role of street trees, rather than grass or planters, should also be overtly acknowledged and acted upon, in Merton's town centres. In the current climate emergency, trees address the urban heat island effect, pollution, air quality, carbon absorption, providing humidification, oxygen, canopy shelter from rain and radiation and essential biodiversity corridors between pockets of green urban space.

Many people, including councillors and council staff, have not yet taken on board the implications of the Climate Emergency and regard tackling it as a choice rather than a necessity. It is urgently requested that Climate Emergency awareness training is provided to officers and councillors.

Managing local Flooding 08.09

Trees growing in SINC/Green Corridor spaces which are also located on a flood plain, with severe flood risk, eg Wyke Road , should be fully protected, since they play a crucial role in flood mitigation, in addition to their many other beneficial roles.

Improving Air Quality and Pollution 08.11:

Merton seriously falls behind other Boroughs in addressing air pollution through encouraging active travel via improved, vehicle free pavements and safe segregated cycling infrastructure. It needs to develop a less motor centric approach. Even electric vehicles are a cause of pollution due to brake/tyre particulates and due to current sources of electricity, and should also be discouraged in favour of public transport and active travel.

Climate Change 12

Whilst aims to achieve net-zero carbon by 2050 is commended, the focus upon growth and development rather than climate change is resulting in a significant loss of green space in private gardens, due to a rapid trend to 'maximise space', not for trees and plants, but for buildings. Is Merton recording and collecting data about the

current area of tree canopy in private gardens, and the presumed loss, which will not help targets to increase tree canopy cover 10% by 2050? Trees are crucial in the current climate emergency for their multifunctional benefits, including carbon sequestration, flood prevention, addressing the urban heat island effect, pollution, air quality, providing humidification, oxygen, canopy shelter re rain & radiation and essential biodiversity corridors between pockets of green urban.