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**MERTON PARK WARD RESIDENTS ASSOCIATION**

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**Response of Merton Park Ward Residents Association (MPWRA) to Merton Local Plan Consultation 2a.**

MPWRA is the residents' association for Merton Park Ward. Before making general comments on revision of the Local Plan, we have some specific comments concerning our area:

(i) **Green Corridor Site 13 (Dwellings at end of Rutlish Road)** now excludes “vegetated area and footpath adjacent to Tram Stop” from the Green Corridor. This area is actually an important site for local nature conservation. The “brambles and snowberries” are a long-established breeding and feeding site for butterflies and birds, and is the home of a colony of Long Tailed Tits. There is also an adjoining orchard containing extensive bee-hives, and the flowers on the site provide for bees to gather nectar. We have no objection to excluding the land which has already been built on for housing and parking, but we would ask that the rest of that site remains protected as part of the adjoining Green Chain Corridor.

(ii) In the **Lists of Historic Parks and Gardens**, we would like to see **The John Innes Park** included.

This is a Green Flag awarded Arts and Crafts Park, within which there are a number of significant Locally Listed Buildings.

**General Comments**

(1)

The plan in its current form lacks ease of navigation to find specific policies. An index, contents and/or search facility is required, e.g. please see (3) below on **Chapter 16 Places and Spaces (D5.1)**.

(2)

Many policies require detail and focus to provide guidance and avoid being a mere wish list.

(3)

The frequently used expression “high quality design” is defined in **Chapter 16 Places and Spaces (D5.1)** - but needs to be linked to other chapters in The Plan. An Index would help with this -please see (1) above.

Over several decades this expression has been an aim in improving Wimbledon Town Centre but, again and again, new buildings have failed to improve the area or “preserve and enhance”.

Recent planning consents in Merton have been made on the grounds that “only an acceptable level of harm would result”. The high quality design policy needs strengthening to make it clear that positive results are required of planning applications rather than minimum harm. The strengthening should enable refusal of applications that fail high quality design requirements.

(4)

**Chapter 16 Places and Spaces Policy D5.5.5** classes **Locally Listed Buildings** as Undesignated Heritage Assets. We must object to this. They are the renamed Grade III Listed Buildings and should be recognized as such. In Merton Park we have many Locally Listed Buildings of historic architectural significance which are the basis of the character of the John Innes Conservation Areas. Locally Listed buildings, and their settings, require far stronger protection than given in D5.5.5.

(5)

During past stages of the consultation on the Local Plan, including Wimbledon Plan workshops, residents objected to high rise buildings and “Croydonisation”. This has been ignored and undermines faith in the point of consultations.

(6)

We have previously commented on the danger of over-provision of office space in light of existing empty offices in Wimbledon, and competing developments elsewhere.

**Policy TC7.5:** The Plan should give more weight to the new fashion to convert commercial premises to residential. Planners and developers should be encouraged to take commercial to residential convertibility into account in designs. Adequate open space needs building-in to town planning so that children could be allowed out to play where commercial is converted to housing. Such a policy would help to alleviate pressure for developments on back gardens and guide town planning towards a more friendly scale of building size.

**Policy TC7.7:** We particularly believe that commercial and shop accommodation on local shopping parades should be preserved as such.

- Please note we did not support the recent Government White Paper on converting commercial property to residential **without planning permission**.

(7)

Our past comments included not over-building residential property without specific pre-made plans for provision of schools, health services, leisure, recreation, utilities, public transport and other infrastructure. This remains to be rectified in the Plan.

For instance **Policy IN16.2** has just two short policies (i and j) which only “support”. The Plan should commit to **identifying and safeguarding sites**.

(8)

Transport policies designed to encourage walking and cycling **in Policy T6.4** need detail and guidance. The following should be built into the policies:

Plans must recognise the needs of, among others:

- the ageing sector of the population as well as the less able.
- Those who drive to work and need their cars during the working day e.g. many NHS worker such as at St Georges Hospital which is a major employer in Merton.

Studies of purposes of journeys, and origin and destination surveys, should be required, before implementation of schemes such as Low Traffic Neighbourhoods and School Streets

Policies to reduce traffic in residential streets must avoid putting even more traffic into pollution black spots and other residential areas.

(9)

**Chapter 12 Green and Blue Infrastructure Policy O8.1** The Plan's wish list encompasses greening and sustainability. This needs more supporting policies. We suggest in particular:

- The ecological importance of private gardens, including front gardens, needs emphasis and there should be a firm presumption against building new dwellings in back gardens.
- that all trees and groups of smaller trees in Green Corridors should be protected by TPO's

Hubert Child  
Chairman MPWRA