



The Residents' Association of West Wimbledon

93 Cottenham Park Road
London SW20 0DS
1st February 2021

Tara Butler
Planning
Merton Civic Centre
London Road
Morden
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SM4 5DX

Draft Local Plan 2a comments from the Residents' Association of West Wimbledon.

Dear Ms Butler,

I write on behalf of the Residents' Association of West Wimbledon to comment on draft 2a of the Local Plan.

Urban development objectives and good growth strategy

4. Neighbourhoods

Raynes Park: Policy N3.4

Local centre - We welcome the support for step free access at Raynes Park station and the emphasis on flood prevention in Raynes Park centre.

Surrounding area – providing new homes at Shannon Corner is not supported due to the poor access to public transport.

6. Places and spaces in a growing borough

Design policies

D5.1 Tall buildings are described as '*any building that is over six storeys and is also substantially taller than their surroundings and cause a significant change to the skyline*'. We are pleased to see that the area where 'tall buildings' will be permitted excludes Raynes Park but this definition would appear to allow for a creeping increase in height as each new application

comes in a step higher than the last approval. RAWW does not support a policy that would permit 6 storeys plus 'creep' in the local centre of Raynes Park.

D5.2 I - This policy is welcome but should be strengthened e.g. - I. *New development located in proximity to, and likely to be conspicuous from, Metropolitan Open Land (MOL) or designated open space, ~~should~~ must be designed to positively contribute to the amenity of the open space.*

Design considerations in all developments: Policy D5.3

f. The policy to 'Ensure provision of appropriate levels of sunlight and daylight' is welcome but clear supplementary guidance is needed on how this is to be measured and what is deemed appropriate.

iii. *Ensure trees and other landscape features are protected*; This is terribly weak given the importance of trees in the climate change strategy. Permitting mature trees to be removed to allow development without requiring replacement with equivalent tree canopy cover or tree years will result in a continued loss of tree cover and be inconsistent with the climate change strategy.

ix. *Houses and ground floor maisonettes/duplex units will require a garden with a minimum 50m² area of as a single useable regular shaped amenity space. Flexibility may be applied to constrained sites and higher density development where justified.* The highlighted sentence undermines the policy and should be deleted. It is in constrained sites and high density developments where the policy most needs to be enforced.

x. *New flatted development should aim to provide an area of communal amenity space in addition to requirements for private amenity space.* This is a welcome new policy but inclusion of the words 'aim to' will make it very hard to enforce.

Managing Heritage Assets: Policy D5.5

Proposals that will lead to substantial harm to the significance of, or the total loss of heritage assets will only be granted in exceptional circumstances where substantial public benefits outweigh the harm or loss no viable use of the heritage asset itself can be found that will enable its conservation; and,the harm or loss is substantially outweighed by the benefit of bringing the site back into use.

There is considerable room for interpretation of the acceptable reasons for loss of or harm to heritage assets. What benefits of bringing the site back into use can be weighed against the permanent loss of the asset? What confidence is there in viability studies commissioned by developers?

Telecommunications: Policy D5.7

Recent experience of an unsuccessful application for a mast just outside an area designated as MOL and Conservation Area has taught us that applicants can be very ill informed about the area in which they are seeking a site. They conduct their own survey, seemingly not guided by the Council, or knowledge of land designations. There needs to be guidance/coordination by

the Council or other body to avoid the unnecessary proliferation of sites and ensure mast sharing is used to the maximum extent possible.

Mast sharing should be promoted in the policy by requiring applicants to demonstrate clearly that all opportunities for site/mast sharing have been considered. Without one industry wide, publicly accessible, data set on the existing and planned installations this is very hard for the Council or public to assess.

12. Green and Blue Infrastructure

Open Space, Green Infrastructure and Nature Conservation: Policy O8.1

The list of designated sites losing their protected status due to development is a clear warning that current policies must be strengthened in the new plan.

e. Increasing the number of trees in the borough; Increasing the number is not good enough. 10 whips or 10 small trees are not a replacement for 10 semi mature or mature trees. The aim has to be much more ambitious to be consistent with environmental policies. The aim should be to increase tree canopy cover in the borough. We are still losing tree cover.

Open Space and Green Infrastructure: Policy O8.2

The policy is not strong enough.

b. should not be built on unless: i. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; There is too much dependence on assessments commissioned by developers.

Development within designated open spaces should only be permitted if it is ancillary to the use of the open space.

Biodiversity and Access to Nature: Policy O8.3

We are losing green corridors that cannot be replaced. This needs strengthening

*c. **Ensure that** development which may destroy or impair the integrity of Green Corridors will not be permitted. Proposed development in and adjacent to Green Corridors will be **expected** to enhance their nature conservation value.*

Delete 'ensure that'. Replace expected with 'required'.

We are losing SINCs that cannot be replaced

*e. Require the following mitigation hierarchy to be followed, for development where significant harm to biodiversity is unavoidable, and **where the benefits of the development proposal clearly outweigh the impacts on biodiversity:***

These words leave the door wide open to development on designated nature conservation areas. What 'benefits'. If building new homes is an acceptable benefit the policy provides very little protection.

Protection of Trees: Policy O8.4

*In circumstances where e) iv. or v. applies, suitable high-quality re-provision of **equal value** must be provided on site.* What does equal value mean? The replacement should be equal in terms of tree cover/years provided.

Flood risk management and sustainable drainage: Policy 08.9

c. Developments must demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development.

In the case of foul sewers this is impossible for the developer to do accurately due to the unknown amount/sources of storm water entering the foul system. A desk top study is not adequate. The policy needs to place clearer emphasis on use of records of foul sewer flooding.

Sustainable Drainage Systems (SUDS): Policy 08.10

c. Ensuring developers prove the maintenance and long-term management of SUDS through a SUDS Management Plan to be submitted as part of the planning process.

This policy needs strengthening to ensure that not only are SUDs schemes included in major developments but also to ensure that they are installed and then maintained as approved. An attenuation pond without the hydrobrake installed at the outlet might be a nice landscape feature but it is not a SUDs. SUDs schemes are by their nature largely underground and invisible without a camera survey and thus it is difficult to enforce compliance with approved plans. Could this plan require the developer, on major schemes, to conduct and publish the report of a post installation survey?

Proposed Changes to the Merton Sites and Policies Environmental Maps – Raynes Park

Site 4: Former Wolfson Hospital and Atkinson Morley Hospital, Wimbledon

The MOL and SINC shown in Site 4 comprises land which is now partly in Morley Park, partly in Wimbledon Hill Park (WHP), and partly in Prospect Place. The title should be changed accordingly.

The text on the SINC only refers to the part in Morley Park. It is important that the SINC is properly recorded against each of the 3 properties to ensure its ongoing protected status is respected.

The area proposed for de-designation does not have approved buildings on it. The western part, now within the Firs development, (Phase 1 of WHP) is private garden. The paved area in the middle of it provides vehicle access to Phases 1 and 3 of the WHP development and a pedestrian route into Morley Park. To the east of that paved area there will be an unfenced landscaped area planted with trees which will provide an appropriate approach to the Morley Park nature conservation area. Continued MOL status for at least that landscaped area is both appropriate and required to protect the setting of the park and the path to it.

Site of Importance for Nature Conservation (SINC MeBI09)

Designation of the Morley Park meadow as SINC is very welcome.

We ask that another part of the Morley Park nature conservation area is also considered for SINC status. This small area, currently mostly meadow and potentially naturalising to woodland, is located immediately to the south of the new WHP development (Phase 3) on the Wolfson site and was previously a lawn area used by the patients and staff of the Wolfson Rehabilitation Centre. There is a badger sett on its southern woodland edge. The woodland to the south and

west of it is already designated as SINC. The simplest solution is probably to extend the SINC to the boundary of what is now the boundary of Phase 3 of the WHP development (the old Wolfson Rehabilitation Centre). That is also the MOL boundary. There is no other obvious boundary. That would then include all of the Morley Park nature conservation area in the SINC.

A similar situation applies in the WHP Phase 2 (former hospital site) section of the SINC. The only boundary that makes sense on the ground to the south of the old hospital building and 2 new apartment blocks is the MOL boundary. Acid lawn/open meadow, crossed by badger trails, now extends right up to the built development. To the east of the built development (from the SE corner of the the eastern block of flats, to the boundary with Prospect Place) the existing SINC boundary is still appropriate.

Proposed corrections to text

3.24 *The area in question comprises an area of woodland, approximately 1.15ha in area.* What is included in the 1.15 hectares? Need to ensure this is compatible with the text.

3.25 *The Morley Park section of the woodland is located to north east of the recreational grassland associated with the 19th Wimbledon Scout Group, and to the west of the public footpath that connects Copse Hill Chambers Park Hill to Cottenham Park Road. The woodland comprises semi-natural broadleaved woodland, and contains a number of mature and semi-mature trees. The woodland is dominated by oak, Sycamore, birch species, ash, wych elm and Acer species are also present. The scrub layer is dominated by bramble and ivy. Other species include holly, ash and sycamore saplings, hawthorn, hedge bindweed and common nettle,*

The description of the WHP section of the woodland would be a bit different as it is more mature.

Open Space Boundary

The Open Space boundary correctly follows the MOL boundary along the boundary between Morley Park and Phase 3 of the WHP development, now known as The Mansions (former Wolfson Rehabilitation Centre). It should do the same on the land within the private land of Phase 2 (former hospital site) of the WHP development. The area of MOL to the east of the old hospital building should be designated as Open Space.

Jane Barnes

Residents' Association of West Wimbledon

CC Raynes Park ward councillors

Village ward councillors