



**DRAFT MERTON LOCAL PLAN**  
**A submission by Wandle Valley Forum to London Borough of Merton**

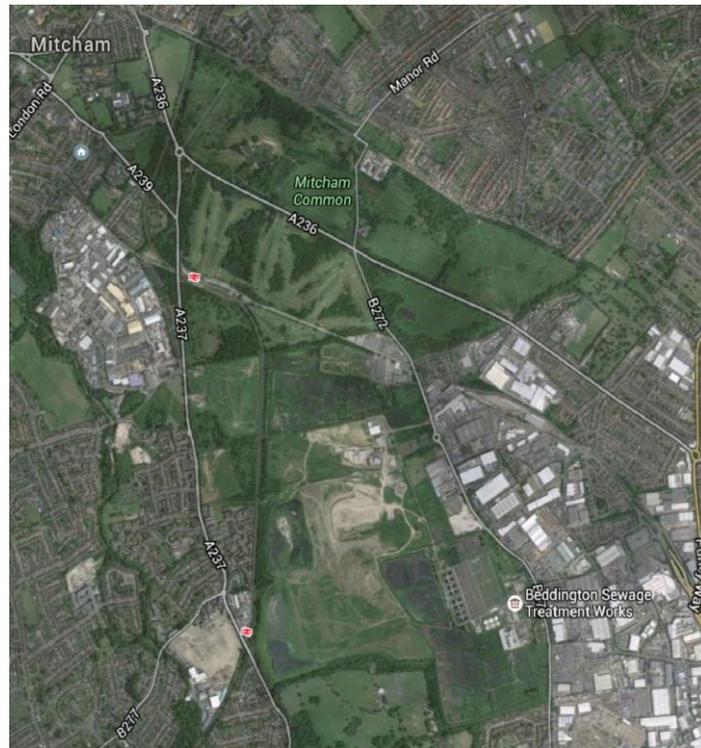
**January 2019**

1. Wandle Valley Forum provides support and an independent voice for over 120 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. Many of our supporters are based in Merton.
  2. Merton includes an important part of the Wandle Valley Regional Park and a significant length of the River Wandle and its major tributary, the River Graveney. The Wandle Valley is a major strategic environmental and heritage asset for the Borough and the site of major industrial sites and employment. The network of Wandle-related open spaces and the Wandle Trail are especially important for the quality of life in Merton and provide an economic opportunity drawing on the area's environmental quality.
  3. We have established our priorities for the Wandle Valley in the [Wandle Valley Forum Charter](#). This is grounded in the views of community groups, voluntary organisations and local businesses that support us. It sets out a number of issues to be addressed through development plans in the Wandle Valley and we ask that Merton's Local Plan responds positively to these.
  4. We believe the Wandle Valley should be a centrepiece of the new Merton Local Plan, with a suite of coherent policies for its protection, renewal and development. Although there is welcome support for the Wandle Valley Regional Park and the Wandle Trail in the Vision and the Strategic Objective for Place as well as Policy N3.7 we have identified a number of areas where the Plan needs to be strengthened. It is of concern that Policy N3.7 repeats much of the existing Policy CS5 which is now out of date and does not reflect changes in national planning policy and the London Plan (which no longer identifies the Wandle Valley for its economic function).
- Provide an indicative boundary for the Wandle Valley Regional Park which reflects the area established in the All London Green Grid. The Key Diagram and the map of "Points of interest" both erroneously identify the course of the river as the Wandle Valley Regional Park and the map accompanying Policy N3.7 associates the "Wandle Valley" with the open spaces along the river. Neither is correct. Both the working boundary established in the All London Green Grid and the route of the Wandle Trail should be included in the Key Diagram and Policy N3.7 map. This wider boundary also aligns with the identification of Mitcham, Morden and Colliers Wood in Policy N3.7
  - Strengthen Strategic Objective 2 to address the Local Plan Vision's ambition for a continuous Wandle Trail through an enabling policy for its completion - e.g. by adding "*and a continuous Wandle Trail through Merton*" to the end of Strategic Objective 2a and

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by recognising the particular opportunity downstream of Trewint Street bridge as a priority

- Strengthen Policy N3.7 by:
  - Providing a clear and consistent policy for development immediately adjacent to the river which requires it to recognise the river's natural and historic significance, respect its character and promote appropriate access (including the provision of minimum 3m wide access along the river front). These requirements should also feature in all relevant site allocations. This clarity of policy is needed to address the problems caused by the current inconsistent and ad hoc approach and its absence is a major gap in the new Local Plan
  - Repositioning the existing policy to protect and enhance the river Wandle and its green infrastructure network by establishing requirements for development within 400 m of the Wandle Valley Regional Park boundary in the policy wording rather than leaving it in the supporting text (paragraph 8.3.12) where it will not carry the weight of planning policy in decisions
  - Identifying the opportunities for environmental improvements and upgrading the industrial estates in the Wandle Valley which will support a virtuous circle of environmental investment and business benefit by ensuring new development contributes to strengthening the environmental quality, cultural vitality and economic health of the Valley. This in turn will attract more visitors, expand the range of customers and make Wandle Valley businesses attractive places to work. There are particular opportunities where large industrial estates have significant frontages along the river, such as in South Wimbledon, Willow Lane, Waterside Way and Weir Road
  - Recognising the historic significance of the Wandle itself as well as the heritage assets nearby and including in this the weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal
  - Identifying delivery and support for the Wandle Valley Regional Park as a priority for strategic use of the community infrastructure levy and s106 obligations, as appropriate. The Plan should also confirm the intention to pool use of the community infrastructure levy across borough boundaries to secure the best outcomes for the Wandle. This would address, for example, the recent shortcomings in dealing with a number of discrete developments spanning the Wandsworth/Merton boundary at Earlsfield. We were informed by Sutton officers at its Local Plan inquiry that it could not collaborate with Merton on Wandle issues because they were not included in Merton's Regulation 123 list
  - Including the commitment to "*support the relocation of existing power lines, pylons and other visually intrusive servicing as part of planning agreements in relation to new developments where it is technically, practically, environmentally, and economically viable*" (paragraph 3.7.17) in the policy rather than supporting text so it carries appropriate weight in planning decisions
  - Supporting delivery of the Catchment Management Plan
  - Clarifying that the Wandle Valley includes the catchment of the River Graveney / Norbury Brook
  - Including an enabling policy for realising the opportunity of the largest area of open space within the Wandle Valley Regional Park which stretches from Beddington Park through to Mitcham Common and Three Kings Piece in Mitcham (see image) – e.g. through an amended Strategic Objective 2. Providing for the coherent management of and increased public access to this area will require close collaboration with both Sutton and Croydon Councils. The area presents an extraordinary economic and social as well as environmental opportunity which will boost the area's identity and provide a wide range of quality of life and public health benefits. This area of green space is more than three times the size of Hyde Park but is little known, much lacks public access and it has never been conceived and managed as a coherent whole. It has strategic significance at a London scale.



- Strengthen Policy D5.2 to identify the Wandle Vistas at Pollards Hill, Mitcham Common, Wimbledon Park and St Marks Road car park, Mitcham for protection and include the [Wandle Vistas](#) report prepared for Wandle Valley Regional Park Trust and Wandle Valley Forum with funding from the Living Wandle Landscape Partnership in the supporting text and evidence base for the Plan.
5. We look forward to being kept involved in the Plan's progress.