



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

January 2021

1. Wandle Valley Forum provides support and an independent voice for over 140 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. We lead the Steering Group co-ordinating plans to close the gap in the Wandle Trail under the railway line near Earlsfield (Project TN23).
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 estates and much 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. It is no accident that the Merton Council logo is inspired by the heritage of the Wandle Valley (waterwheel) and the river Wandle (water).
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, including Merton's Local Plan.

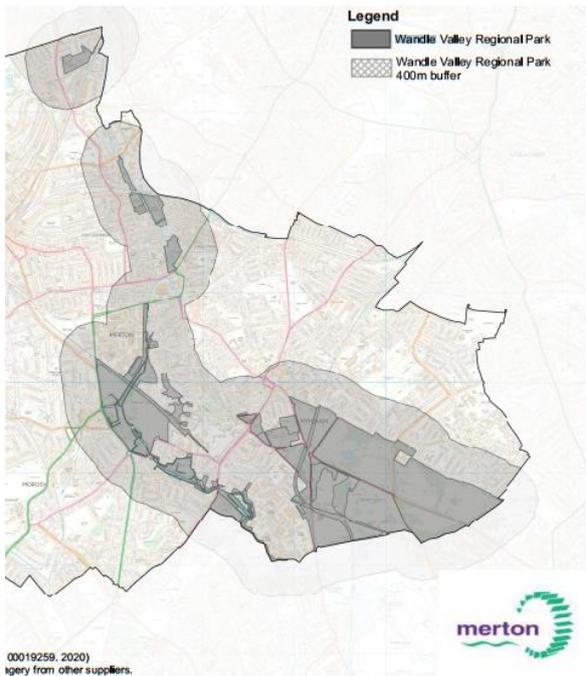
Overall approach

4. Whilst welcoming explicit recognition of the Wandle Valley in Policy O8.7 we believe it should be more of a centrepiece of the new Merton Local Plan, with a suite of coherent policies for its protection, renewal and development. This includes restoring it to the Plan's overall Vision and Objectives from which it has been dropped (other than as a location for employment). The approach should also be consistent with that taken in Wandsworth, Sutton and Croydon which share the Wandle and this should be addressed as part of the wider co-operation with neighbouring local planning authorities.

Policy O8.7 – Wandle Valley

5. Policy O8.7 for the Wandle Valley is welcome and is significantly more effective than Policy CS5 in the current Local Plan. The significance of the policy to Merton as a whole is also evidenced by the fact that the Sustainability Appraisal shows it impacts more sustainability objectives than any other policy in the Plan. Figure 6 of the Sustainability Appraisal needs to confirm that Policy O8.7 impacts on Sustainability Objective 11 (Open Space and Nature) as it presents conflicting positions in the two entries for the Policy.

6. We welcome recognition of the Wandle Valley Regional Park as established in the All London Green Grid, although this should include the whole of Wimbledon Park. The Local Plan should be clear that the Wandle Valley includes the catchment of Norbury Brook/River Graveney. We are unable to confirm the detail of how the Regional Park boundary has been defined in the absence of an updated Policies Map and the map included with the draft Plan (below left) showing its location and that of the 400m buffer is not consistent with the All London Green Grid definition. It erroneously limits definition of the Wandle Valley Regional Park largely to its adjacent green spaces rather than the hatched area in the All London Green Grid Supplementary Planning Guidance (below right). As the Plan notes, the Wandle Valley is viewed “*not just as a collection of green spaces, but as an interconnected system that can benefit communities living and working in the Wandle Valley*” and so is more than the combination of the individual green spaces.



Boundary of Wandle Valley Regional Park In draft Local Plan



Boundary of Wandle Valley Regional Park in All London Green Grid

7. Policy O8.7 can be further strengthened by:

- recognising in section f. the value of the existing Wandle Trail as well as the opportunities for completing it in key locations
- identifying the route of the Wandle Trail (including the variations) on the Policies Map
- requiring development immediately adjacent to the river to provide appropriate public access, including the provision of minimum 3m wide access along the river front (and supporting this in relevant site allocations) through amendments to section e.
- translating the intention that “*all new development within 400m of the Park will also be expected to provide green infrastructure elements on site through urban greening*” in paragraph 1.1.103 into a policy requirement through its inclusion as an addition to section g. and inclusion in the section beginning with paragraph 1.1.119
- recognising in section h. the historic significance of the Wandle itself and its related weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal

- identifying in section k. 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
- translating the “*future opportunities for the Wandle Valley Regional Park to incorporate a large area of open space stretching from Mitcham Common and Three Kings Piece to Beddington, in the neighbouring borough of Sutton*” in paragraph 1.1.118 into an enabling policy for realising the potential of the largest area of open space within the Wandle Valley Regional Park from a clear identity, better access and coherent management
- identifying and protecting the Wandle Vistas at Pollards Hill, Mitcham Common, Wimbledon Park and St Marks Road car park, Mitcham and including 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 evidence base for the Plan – this work has been recognised with the RTPI’s Excellence in Plan Making Practice award and the Landscape Institute’s Award for Landscape Policy and Research.
- translating 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*” in paragraph 1.1.130 into the policy so it carries appropriate weight in planning decisions
- addressing the need for any investment in the Wandle Trail to respect the character of the river’s environs and be designed to prioritise use by pedestrians

8. This section of the Plan should also support delivery of the Wandle Valley’s Catchment Management Plan

Key locations

9. We welcome recognition of the importance of the Wandle, the Wandle Trail, key heritage assets (e.g. Merton Priory) and the opportunities for providing better access and improved connections in the key Objectives for Colliers Wood and Policy N3.1. The Plan is virtually silent on how “*improvements to the Wandle Trail*” will be delivered as a result of the site allocations and other development and needs to be strengthened to require new development to provide for these strategic outcomes. Site location CW5, Priory Retail Park, provides a particular opportunity to improve connectivity across Colliers Wood and to provide much needed investment in improving the condition of Pickle Ditch (the original course of the Wandle). We are concerned the policy approach in Colliers Wood is too enabling of tall buildings that will harm the Wandle Valley, including shadowing of important green space (such as Wandle Park) and the experience of the Wandle Trail. The Policy should require any tall buildings in the area to be designed to avoid such harm.

10. Other site specific opportunities in Merton include:

- Wi7 – Rufus Business Centre – this site allocation should explicitly address the need for any development to provide public access between Dundonald Road Recreation Ground and the Wandle Trail (through the former Haslemere Industrial estate)

- Willow Lane Industrial Estate – support the opportunity to provide public access along the north east bank of the Wandle between Watermead Lane and Bennett's Hole Local Nature Reserve and provide a new boundary between the industrial estate and the river

11. We do not support the inclusion of Site Mo3 at Imperial Fields for housing development. This is designated as Metropolitan Open Land, Green Corridor and Open Space and residential development is clearly inappropriate. No exceptional circumstances are presented to support this allocation which is in major conflict with national, London, and Local Plan policies. It is also notable that the recently completed *Green Infrastructure, Biodiversity and Open Space Study* for the Plan's evidence base "recommends that this area is retained as part of MOL designation" and also concludes that "the whole site meets Open Space criteria" and the area of the site allocation "should be retained" as Green Corridor.

12. We strongly support Projects TN22 and TN23 which would have a transformative impact on the Wandle Trail and connectivity near Earlsfield, including closing the longstanding gap under the railway bridge.

Designations

13. The continued recognition of the Wandle Valley Conservation Area is welcome.

14. We support the continued designation of significant areas of open space within the Wandle Valley to protect its open character and wildlife value, including as Metropolitan Open Land, Open Space, Green Corridor and multiple wildlife designations.

15. We support the proposed additions to Metropolitan Open Land, Open Space and Green Corridor along the Wandle which also ensures a more consistent approach, including TEP-07, TEP-09, TEP-12 and TEP-22.

16. We look forward to being kept involved in the Plan's progress.