



**MERTON LOCAL PLAN – Stage 3 - Examination
A submission by Wandle Valley Forum**

September 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. We have contributed to previous iterations of the Local Plan and acknowledge some changes have been made. Nevertheless, for the purposes of the forthcoming Examination we conclude that the Plan is unsound as it is not robustly justified and will not be effective in being deliverable over the plan period.

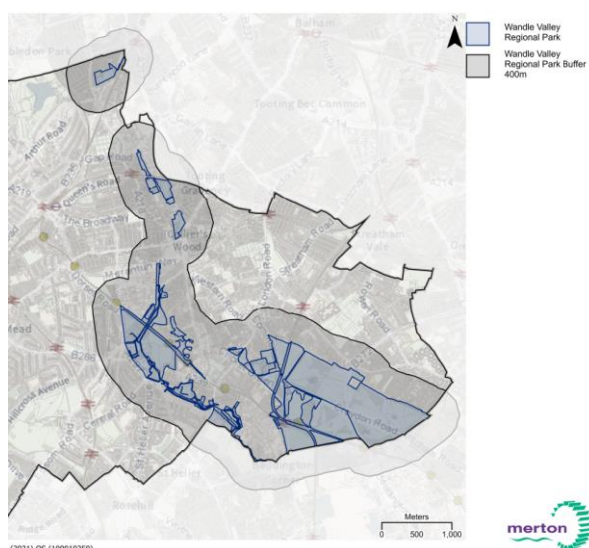
Overall approach

4. Whilst welcoming explicit recognition of the Wandle Valley in Policy O15.6 we believe it has a strategic significance which means it should be more of a centrepiece of the new Merton Local Plan. Its significance to Merton as a whole is also evidenced by the fact that the Sustainability Appraisal shows the Wandle Valley Regional Park policy impacts more sustainability objectives than any other policy in the Plan. To be sound the Local Plan should include the Wandle Valley in the overall Spatial Vision and Strategic Objectives from which it has been dropped (other than as a location for employment) from previous iterations. 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.

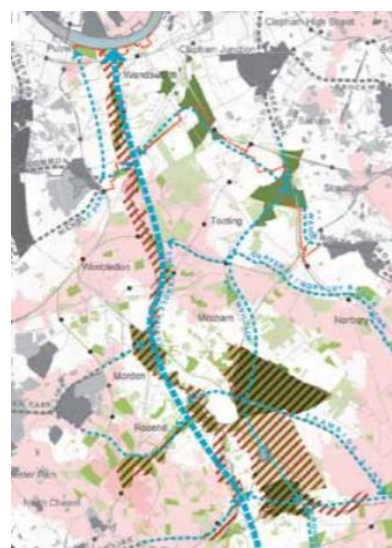
Policy O15.6 – Wandle Valley Regional Park

5. Policy O15.6 for the Wandle Valley is welcome and, if implemented, is significantly more effective than Policy CS5 in the current Local Plan.

6. To be soundly justified the boundary of the Wandle Valley Regional Park needs to be more effectively expressed and evidenced. We welcome recognition of the Wandle Valley Regional Park as established in the All London Green Grid, although we believe 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. The map included with the Local Plan (*Green Infrastructure – WVRP LR*, below left) showing its location and that of the 400m buffer is not consistent with the All London Green Grid definition contrary to the assertion in paragraph 15.6.2. It erroneously limits definition of the Wandle Valley Regional Park largely to its adjacent green spaces rather than the continuous 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. To be sound Policy O15.7 should be strengthened by:

- recognising in section d. the value of the existing Wandle Trail and the need to protect it and provide for new stretches as part of new development, as well as the opportunities for completing the Wandle Trail 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 specifying the provision of minimum 3m wide access along the river front (and supporting this in relevant site allocations) through amendments to section e.
- recognising 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 – a number have been removed without effective consideration of their heritage value

- identifying the opportunities for environmental improvements and upgrading the industrial estates in the Wandle Valley (e.g. Willow Lane, Merton Park) 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 15.6.15 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 – this will help to ensure this aspect of the Plan is deliverable
- 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 and its omission from the evidence base and policy framework is unsound
- 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 15.6.23 into the policy so it carries appropriate weight in planning decisions and is deliverable
- 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 Catchment Plan](#). This would be consistent with national planning policy’s support for Plans to “*take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale*” (NPPF, para 175).

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 to meet the soundness test of effectiveness it 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) and Merton Priory Walls and the Policy should require their positive enhancement. 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, including site allocations CW2 and CW5, as recognised in paragraph 3.1.19.

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 Durnsford 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 very special 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. This is notwithstanding the recent decision of the Mayor of London not to intervene on Merton Council’s consent for a non-compliant residential development.

12. We strongly support Projects TN11 and TN12 where they provide for an improved walking and cycling network supporting the Wandle Trail. Wandle Trail investment should prioritise its use by pedestrians drawing on the Canal and River Trust’s *Towpath Code*. The Plan should clarify that this includes the projects recognised in earlier iterations as 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. This is recognised in paragraph 15.6.10 but not as a specific project.

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. Paragraphs 15.6.11 and 15.6.12 are largely a repeat of the preceding of two paragraphs and should be deleted.