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By email to: [programmeofficer@carmeledwards.com](mailto:programmeofficer@carmeledwards.com)

21 September 2022

Dear Sirs,

**Proposals for Wimbledon Park, Merton Local Plan – Matter 5, Qs 5 and 6**

I am writing with further evidence relating to the Wimbledon Park Site, specifically to set out some contextual evidence which I referred to at the previous hearings, which we feel is directly relevant.

1. Evidence shows a number of similar cases around London where protected green sites are under threat from development. Local groups have, in all cases, resorted to taking legal advice, and in some cases are already taking legal action, to ensure sites are protected into the future. We believe this indicates ***applicants and boroughs in these cases\* do not consider Green Belt and Metropolitan Open Land protections to be a barrier***. This is a serious, and evidenced, concern which we believe provides important context for the decision on Matter 5.

\*Protected sites where legal challenges are currently being raised or considered:

- a. Oakfield Sports Ground – Green Belt (Redbridge). The council has stated its intention to lease a site currently occupied by a grass roots football club, to West Ham United FC.
  - b. Whitewebbs Park – Green Belt (Enfield). The council has stated its intention to lease the site to Tottenham Hotspur Football Club. Green Belt.
  - c. Warren Farm – former playing fields – MOL (Ealing). QPR Football Club withdrew. Southall Football Club has now indicated it is in discussions about the site.
  - d. Greendale Park – MOL (Southwark). Permission granted to build Dulwich Hamlet Football Club on the park as part of a wider development.
2. There is also ***evidence to suggest that perceptions of weakening protections is driving inappropriate speculation*** i.e. where land is bought and/or neglected, despite being protected, in the hope that, in five or ten years' time, planning permission can be gained. (To date, we have not been able to find a way to compel a landowner to allow private land to be used for recreation as intended.) We are aware of a number of sites in London which have been acquired and/or taken out of use/allowed to go out of use in this way, sometimes by local authorities. See list below (images/more sites [here](#)):
    - Leigh Road Sports Ground
    - Barrington Playing Fields
    - Royston Gardens
    - Willow Tree Country Club
    - Bowring Sports Ground (owner currently trying to sell)
    - Sites to the east of Banbury Reservoir

We believe protections in this and other cases need to be given meaningful weighting.

I trust this is helpful.

Yours faithfully

Alice Roberts, Head of Campaigns, CPRE London