



LB Merton Local Plan Inquiry. Statement on Matter 10, question 4. Policy O15.3 f, Areas of Deficiency in Access to Nature

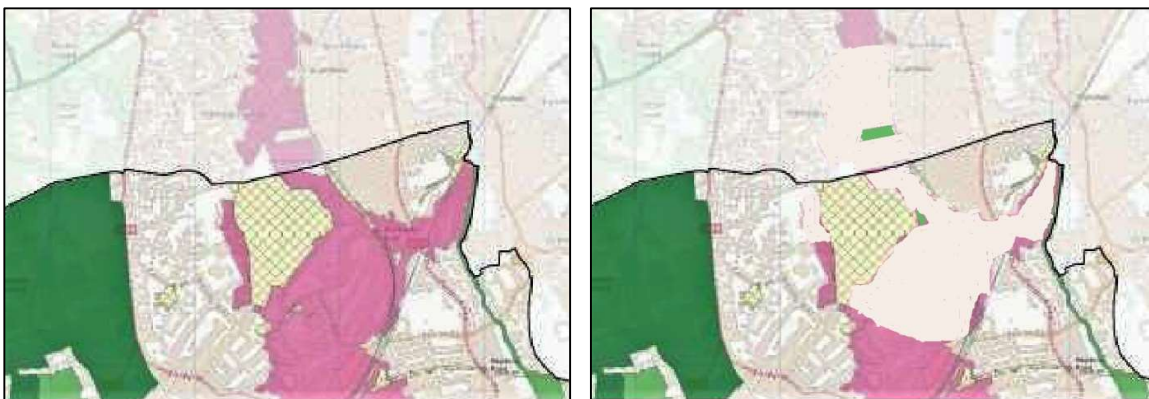
Dr D.G. Dawson, Wimbledon Park Residents' Association. September 2022

I am a professional applied environmental scientist, see my statement for Matter 5 for further detail.

In the draft plan, Site Allocation Wi3 applies to the land holdings of the All England Lawn Tennis Club (AELTC), including Wimbledon Park Golf Course. Under *"Infrastructure Requirements"* of Wi3 it is stated that *"This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies."*

I was surprised by this wording, because the policy seems weak and I was not aware of a previous document which had indicated that Wi3 lay within such an area of deficiency. I live within it! With my colleague, Ian Yarham, I developed the procedures for identifying such areas and we had applied them for LB Merton. On checking, I found that the newly identified Area of Deficiency in Access to Nature (AOD) is the result of a failure to apply the adopted procedure to identify such areas, reversing our earlier work. This statement provides the evidence that this is so and examines the consequences for the local plan.

The mistake seems to originate in the 2020 *Green and Blue Infrastructure, Biodiversity and Open Space Study London Borough of Merton*. This study gives an obviously erroneous map of AODs in and near the Grade II* heritage Wimbledon Park. Below, I reproduce the relevant sector of the map as in Merton's report (left) and as corrected (right). The pink colour indicates the AODs.



The 2020 study claimed that the adopted procedures for identifying Areas of Deficiency were followed. The study states, correctly, that these Areas of Deficiency

are “*areas where people have to walk more than one kilometre to reach an accessible wildlife site of metropolitan or borough importance, the accessible wildlife sites being Sites of Importance for Nature Conservation*”. This wording is from Appendix I of “*Connecting with London’s nature. The Mayor’s Biodiversity Strategy*. 2002. It is repeated in paragraph 15.3.22 of the draft local plan.

The 2020 study relied upon Greenspace Information for Greater London (GIGL) to map the areas of deficiency. The procedures employed by GIGL are exemplary and I have no doubt that the error did not originate there. Rather, the error originated because three accessible Sites of Importance for nature conservation were not taken into account. These are:

1. Horse Close Wood, (Borough Grade I) at the northern tip of the public Wimbledon Park (within LB Wandsworth). This is within 60 metres of the Wimbledon Park Road entrance to the public park, so areas within 940 metres walking distance of that entrance are not deficient in access to nature.
2. Ashen Grove Wood (Borough Grade I), which lies at the Home Park Road entrance to the public Wimbledon Park, so areas within 1000 metres walking distance of that entrance are not deficient.
3. The hedgerow running north from the Revelstoke Road entrance to the public park, which begins 50 metres from that entrance, so areas within 950 metres walking distance of that entrance are not deficient.

I cannot account for the neglect of 1 and 3 above. Although they lie within LB Wandsworth, areas of deficiency are defined without regard to local authority boundaries and there have been no changes to the sites, nor to the access. The neglect of Ashen Grove Wood may have been because of an error in the proposal map, now corrected (see my submission on nature conservation sites). However, even if Ashen Grove Wood was not thought to be accessible, there is access to Wimbledon Park Lake (a Borough Grade I site) on the lakeside promenade of the public park, which is within 170 metres of the Home Park Road entrance.

I have added these three accessible areas on the corrected map. Taking them into account removes the AOD in the public park and in the suburbs around all of the Grade II* heritage park, except for a sliver of land centred on the southern part of the AELTC land, where few people live.

AODs have four functions:

1. The original function was to prioritise areas where accessible Sites of Local Importance for nature conservation should be identified and protected, the rationale being that these provide the best available access, even if the present quality of the habitat doesn't pass muster (Paragraphs A1.2.11 & A1.2.12 of *Connecting with London’s nature*).
2. To prioritise areas where new access can be made to sites which are already of Borough Importance for nature conservation, or walking routes to them shortened.
3. To prioritise areas where existing accessible places can be improved or created so that they become Borough grade, where they currently are not.

4. To act as a measure to track progress, or lack of it, across some planning area, such as an individual Borough, or London-wide.

Functions 2 and 3 were developed in the 2000s and made explicit in section 3 of the *London Plan Implementation Report Improving Londoners' Access to Nature*. 2008.

The relevant London Plan Policy is G6 B 2) "*Boroughs, in developing Development Plans, should identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them.*" A "SINC" is a Site of nature conservation importance.

The draft local plan makes no reference to London Plan Policy G6 B 2. Its Green Infrastructure policy is O15.3 f. *We will expect all development on sites found in an area of deficiency in access to nature to incorporate appropriate Biodiversity elements and habitat features to improve nature conservation, and to improve accessibility to SINC's through site design.*

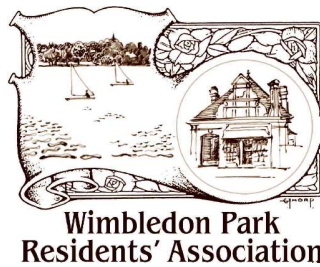
The policy background is disparate. The London Plan "*addresses*" AODs, The draft plan seeks to "*improve*" sites, and Sites within AODs are to "*alleviate*" the deficiency. The draft local plan is unsound as it is not consistent with the stronger wording of the London Plan. I recommend a Main Modification to amend Policy O15.3 f to be consistent with London Plan Policy G6 B 2.

The draft plan identifies just 13 Sites that lie in an AOD (Mi4, Mi14, Mo2, RP1, RP2, RP3, RP4, RP7, Wi3, Wi9, Wi10, Wi13 and Wi16) and where "*The Council will require proposals to alleviate this deficiency in accordance with the Green infrastructure policies.*" Most of these now have built development and all are much smaller than is Wi3. For these, whilst any improvement to access or quality would "*alleviate*" deficiencies, it is most unlikely that the deficiency could be *addressed*. The best prospect amongst these others is Mi14, a 5-hectare sports ground. At best, such Sites might achieve below par status as Sites of Local importance.

The Wimbledon Park Golf Course is the only real prospect in this list of Sites to address an AOD, as it is already a Borough Grade I Site of Importance for nature conservation to which most of the public are denied access. An amended Policy O15.3 f, however, applies Borough-wide, so the golf course does not need to be included within Wi3 for the policy to be applied. Unfortunately, having corrected the AOD, we find that any reduction in an area of deficiency here would be marginal. In such places the *London Plan Implementation Report Improving Londoners' Access to Nature* states that "*such areas are of lower priority for work to improve access to nature*".

The procedures for defining Areas of Deficiency in Access to Nature require the access to be freely open. Appendix I of the *London Plan Implementation Report Improving Londoners' Access to Nature* states "*To be counted as providing significant access to nature, a site must be open for at least five days a week*". The details of Wi3 ("*improve community access... secure pedestrian and cycle access to areas of formerly private land*") do not ensure this degree of access. Wi3 should be amended accordingly.

As there have already been misleading claims that a significant area of deficiency will be redressed through changes on the golf course, it is important that the AOD be corrected in the local plan. Further, the wording of Wi3 should be revised to clarify that public access to redress any deficiency would need to be open at least five days a week.

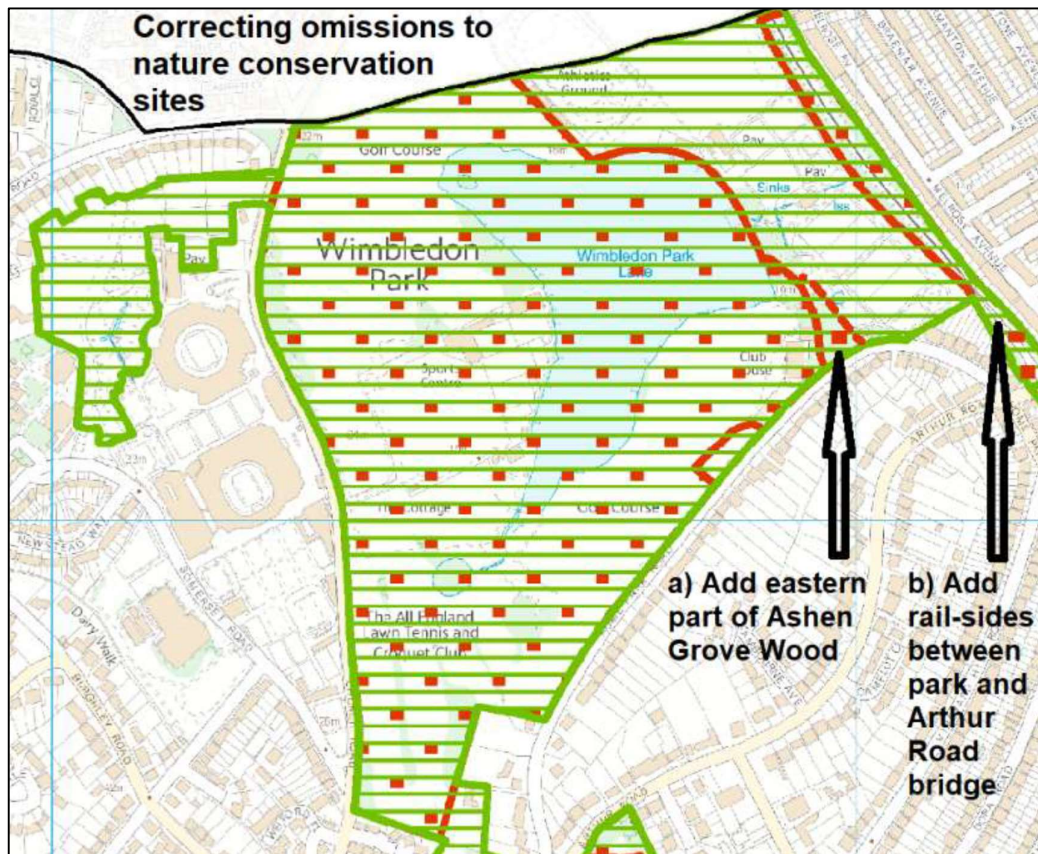


LB Merton Local Plan Inquiry. Statement on Matter 10, Policy 015.3 Nature Conservation Sites.

Dr D.G. Dawson, Wimbledon Park Residents' Association. September 2022

In my September 2021 submission on the consultation draft of the Local Plan I pointed out two mistakes in the indication of Nature Conservation Sites (now termed Sites of Recognised Nature Conservation Interest) on the proposals map.

I reproduce the plan from that submission to aid the identification of the two sites:



The first error was corrected in revisions to the Proposals map (MM SINC Map-05, in the Schedule of Main Modifications) and I welcome that revision. The revision is relevant to an Area of Deficiency in Access to Nature that is the subject of another submission to this hearing (Statement on Matter 10, question 4, Policy 015.3 f Areas of Deficiency in Access to Nature).

The second error remains unacknowledged and uncorrected. A short section of a Grade II Site of Borough Importance for nature conservation was omitted from the Proposals Map. This is defined on the tube line cutting between the Arthur Road bridge at Wimbledon Park tube station and the easternmost corner of the public park.

This nature conservation site was depicted accurately in the character assessment of the Conservation area, but inaccurately in the proposed revisions to the local plan. I presume this to be a drafting error, because there has been no material change to the nature conservation interest since the original designation, but the error was not addressed by the *The Environment Partnership (Proposed changes to Wimbledon Environmental Maps, November 2020)*. Extensive engineering work by London Underground Limited to the tube line adjoining Wimbledon Park affected this area, but not the eastern linesides and the western sides were restored to nature.

My property backs onto this section of tube line and I have extensive notes on its history. There is no doubt that it qualified as a Borough Grade II site when first identified, and subject to extensive public consultation, in the preparation of *Nature Conservation in Merton* in the late 1990s, and has remained so ever since. There was no consultation with local residents on the proposed deletion when it was made. It was the consultation on the draft Local Plan that drew it to my attention.

Whilst this omission may not be seen as requiring a Main Modification, it makes the nature conservation site discontinuous here and fails to acknowledge the importance of the railsides here for nature conservation. The Proposals Map should be corrected accordingly.