

**From:**  
**To:** [Future Merton](#)  
**Cc:**  
**Subject:** Consultation on main modifications to Merton's draft Local Plan  
**Date:** 22 March 2024 12:04:50  
**Attachments:** [Main Modifications Comments.docx](#)

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I attach comments on the Main Modifications from the Residents' Association of West Wimbledon.



## The Residents' Association of West Wimbledon

22<sup>nd</sup> March 2024

Future Merton  
Merton Council, Civic Centre,  
London Road, MORDEN, SM4 5DX.

Dear Future Merton,

Please find below comments from the Residents' Association of West Wimbledon (RAWW) on the proposed Main Modifications. Our comments are primarily on:

1. The policies which we rely on most to protect and improve our area which includes a large area of MOL, several conservation areas and SINCs, and is prone to surface water flooding.
2. The sites in our area, and those nearby which are of interest to our residents

We refer to each of the Main Modifications we comment on by the MM number and page as in the document titled 'Schedule of Main Modifications'.

### **MM10 P32 Spatial vision, new bullet point.**

We strongly [support](#) inclusion of this new bullet point 'Have protected and improved access to the borough's Metropolitan Open Land (MOL), parks and open spaces, and have protected and enhanced biodiversity and areas of nature conservation'.

### **MM93 P229 RP3 Tesco site**

[Support](#) inclusion of "Development proposal should aim to restore the Pyl Brook, with natural banks and buffer habitat to create a wide corridor, facilitating biodiversity net gain and providing a significant improvement to the green corridor."

### **MM95 P233 RP3 Burlington Road**

**Object to** addition of this point on the approach to tall buildings 'The site could include a range of tall buildings up to an appropriate upper limit of circa 52m (approx. 15 storeys).

15 storeys would be totally out of keeping with its setting and seems at odds with the rest of the policy which supports use of community engagement and preparation of design codes to guide what might be appropriate for the site.

### **MM107 P267 Wimbledon: Policy N9.1**

**Object to addition of** ' Supporting tall buildings within Wimbledon Town Centre' which is inconsistent with the limit of 6 storeys supported by local residents.

## MM108 P268 Wimbledon: Policy N9.1

**Object to removal of** the words 'reduce severance with new bridges over the railway'. It has long been recognised that the dependence on the single bridge over the railway leaves the centre of Wimbledon vulnerable to major disruption, forces a large volume of vehicles through the town centre/public transport hub and severely limits options for pedestrianisation.

## M110 & MM111 Wimbledon Policy N9.1 AELTC

In the Wimbledon Policies section we **support the changes** below. The previous wording would have been inconsistent with the designation of all of Wimbledon Park as MOL.

MM110	269	Wimbledon Policy N9.1, q	Recognising the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of the AELTC's facilities <del>either side of Church Road in Wimbledon</del> and at Raynes Park to maintain its global position as <b>a world class sporting venue of national and international significance</b> <del>the best grass Grand Slam tennis competition and to provide economic, community and sporting benefits locally</del>
MM111	275	9.1.35	We will support the continued upgrade and improvement of <del>all</del> AELTC's facilities to maintain its global position as <b>a world class sporting venue of national and international significance</b> , <del>the premier Grand Slam as set out in more detail in site allocation Wi3.</del>

## MM114 p282 Site Allocation Wi3

In the Wimbledon Site Allocations section we **support** the removal of the former Wimbledon Park Golf Course as part of Site Wi13: All England Lawn Tennis Club, Church Road. It is a part of Wimbledon Park and plans for its future have to be considered in that context.

## MM Appendix 5 -new chapter 8 after page 275 (MM112) new policy 8.1 Wimbledon Park

We note the inclusion of a new chapter on Wimbledon Park (Policy N8.1) setting out the policies for all 3 parts of Wimbledon Park MOL (AELTC, Council and Wimbledon Club owned) which fall within the borough. **This is supported in principle**. We will leave those better qualified to do so to comment on the detail.

## MM213 p387 Policy 12.3 Ensuring high quality design for all developments

**f. Object to removal of** 'Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens.'

This needs to be clear that the policy on levels of light to neighbouring properties includes light to the neighbouring gardens. Loss of light to gardens is a very common and justified cause of concern for those living next to proposed developments. These words are not repetition. They are required for clarity that would not be achieved with the proposed revisions to 12.3 g.

## **MM228 p402 Policy D12.5 A Managing Heritage Assets**

**Object to the removal** of 'Development proposals affecting a heritage asset or its setting will be assessed against: ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.'

These guides are a very useful tool for any developer or property owner considering new development or modifications to properties in and around a conservation area. A lot of work has gone into them.

## **MM266 p427 Policy 12.10.19**

**Object to** the inclusion of a new phrase saying that basements 'will be supported' in conservation areas. Suggest replacement with 'will only be supported if'.

It should be the exception rather the rule that basements will be supported in conservation areas. Basements can have negative impact on the appearance (light wells) and structure of buildings.

## **Chapter 14: Infrastructure p484 Policy 14.1.15**

The proposed modification is

14.1.15 ~~We-The council~~ will work with the water and wastewater ~~companiesproviders~~ to ~~help them develop and implement their plans, to~~ ensure that there is adequate water ~~supply, surface water, foul drainage, and~~ wastewater infrastructure ~~and sewerage treatment capacity~~ to serve all new developments. ~~Developers will also need to agree details with water and wastewater companies for adequate water supply, surface water, foul drainage and sewerage treatment capacity.~~

We propose further amendment to this paragraph to make clear that the Council will not only work with the water and waste water authorities to ensure adequate drainage infrastructure to cope with new developments but also to ensure that capacity meets existing needs. Drainage capacity is not currently adequate in all parts of Merton. West Wimbledon, and especially the Raynes Park local centre, has suffered from repeated surface water flooding. There is a lot of catching up to do.

## **MM295 p517 Policy O15.4, part e and f**

Suggested amendment to e. and f. - Instead of just considering the 'amenity value' of trees proposed for removal and replacement trees both the 'amenity and ecological value' of the trees should be considered.

Suggested addition to f. - 'consist of appropriate species native to the UK and of a trunk girth that matches the girths of the lost trees'.

Replacing mature trees lost to make way for development with an equal number of young trees will reduce tree canopy cover and not be of equal amenity and ecological value. There needs to be some guidance in the plan on how the 'value' of the trees will be measured.

The MM as currently proposed is:

The loss of trees, hedges and other landscape features of amenity value will only be justified when:

- i. Their removal would not have a significant negative impact on the local environment and its enjoyment by the public.
- ii. Their removal is necessary in the interest of good arboricultural practice; or
- iii. The benefits of the development outweigh the amenity value of any features that would be lost.

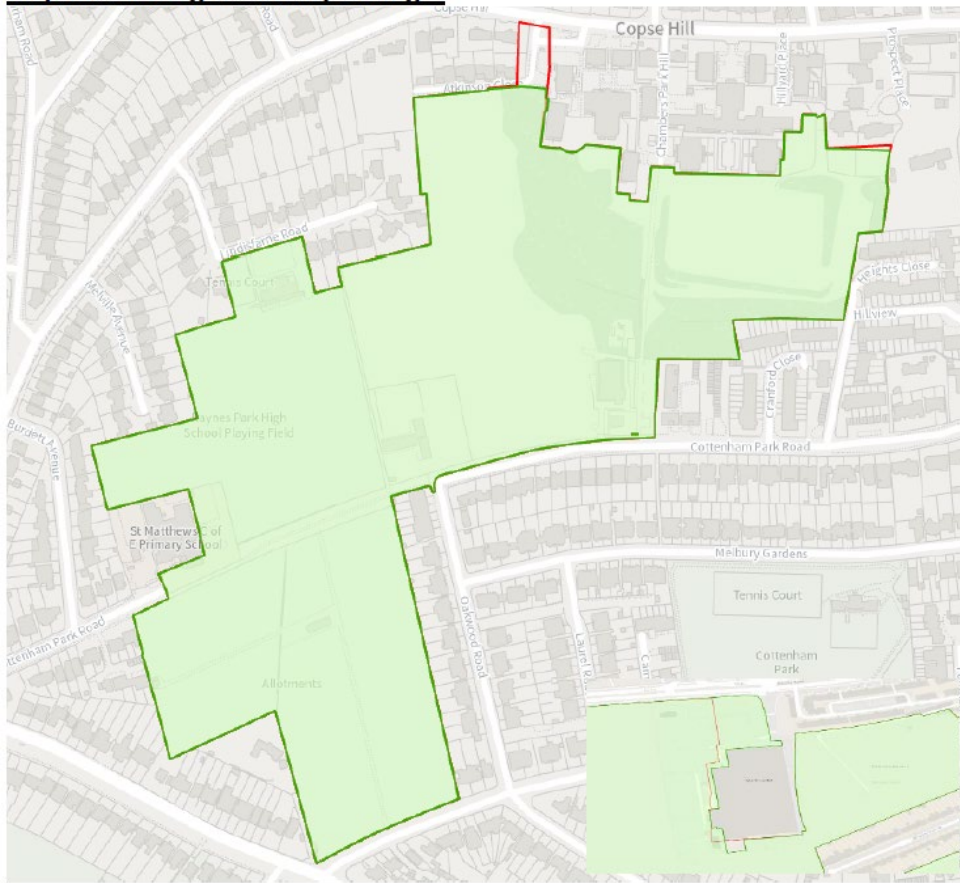
In circumstances where i, ii or iii applies, suitable high-quality re-provision of equal value must be provided on site. Where on site provision is demonstrably not possible, as agreed with the council a financial contribution of the full cost of appropriate re-provision will be required.

- f. Expect proposals for new and replacement trees, hedges and landscape features of amenity value to consist of appropriate native species to the UK.

## Appendices

### MOL-05 – Copse Hill

#### Map illustrating boundary change:



It is unclear why the very small change is proposed at top right of the plan. The text makes no mention of it. There was nothing in 13/P2722 or 16/P4853 that affected this corner of the MOL.

All references to the Wilson Hospital should be removed. The other 'hospital' site that has been redeveloped, and has a boundary with the Copse Hill MOL, is the Wolfson

Rehabilitation Centre. There is no MOL within the Wolfson redevelopment. The following amendments are required:

1. *The Copse Hill MOL is located within the Wimbledon Neighbourhood. It includes Morley Park and other green spaces around the Atkinson Morley Hospital and former Wilson Hospital residential development.*
2. *The physical boundaries include:*
  - North – Built form at Atkinson Morley and the former ~~Wilson Hospital~~ Wolfson Rehabilitation Centre
3. *The built form of the new developments at Atkinson Morley and the former ~~Wilson Hospital~~ Wolfson Rehabilitation Centre sites set the physical boundaries of the northern edge of this MOL*

Yours sincerely

Residents' Association of West Wimbledon

Copies: Village and Raynes Park Ward Councillors