

From:
To: [Future Merton](#)
Cc:
Subject: Inspectors' Main Modifications - the Wimbledon Society's Response
Date: 19 March 2024 15:07:47
Attachments: [WS Local Plan MM response letter 3 24.pdf](#)

I attach the Wimbledon Society's response to the Inspectors' Main Modifications.

This complements the letter of 15 March from Wimbledon Park Residents' Association (WPRA), as it was agreed between Wimbledon Society and WPRA that they would address the proposed Policy N8.1 and we would comment on everything else. Both bodies support and endorse each other's letter.

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

19 March 2024

Dear Future Merton Team

MERTON'S LOCAL PLAN: RESPONSE TO THE INSPECTORS' PROPOSED MAIN MODIFICATIONS

The Society has considered the proposed Main Modifications to the Local Plan, and our responses are set out below, **for consideration by the Inspectors.**

We have deliberately omitted referring to the proposed new Policy N8.1 which relates to the future management of Wimbledon Park. That is because we have co-operated with the Wimbledon Park Residents Association in the preparation of their very detailed submission to you on this specific aspect (c.f. their letter dated 15 March 2024). We wish to make it clear that The Wimbledon Society fully supports that submission. In summary, we contend that it was correct to remove the Park from the Wi3 allocation, and that it is appropriate to establish a plan for its future management. However, we join with the WPRA in asserting that the proposed new Policy N8.1 is misguided and inappropriate, rendering the Local Plan unsound in this regard. There are numerous policies already set out in the Local Plan which cover key features of the Park (in common with other sites in Merton listed as "Heritage at Risk"). The express linkage of the Policy N8.1 to the AELTC planning application is unacceptable and should be struck out.

We have of course only commented on the "**Red**" changes that have been incorporated into the LBM 31 document, and either support what is being proposed by the Inspectors (**in Blue**), or suggest a change/objection in **Bold**.

In the latter case we give short reasons.

In the time available we have not been able to undertake any meaningful checks on the accuracy or completeness of any of the Appendices, except for the comment on Locally Listed Buildings on page 742.

The references are to the page numbers as set out in document LBM 31, and our responses are as follows.

Page 19 Ideally, the small key **BOROUGH MAP WOULD GAIN FROM UPDATING** please, for clarity:
eg :

- Railways being shown as a solid line:
- Adding in the lines of main roads outside the Borough boundary, to aid understanding:
- Site allocations need to be shown as a symbol (eg star) so that the basic underlying land use allocation remains clear eg Wimbledon Park should be shown as MOL green, not as a yellow site:
- Arrows should follow river flows.

1.2.50 **Note** that references to Crossrail 2 have generally been removed, being presumed to come later, after the Plan period: although there are still references to it in the later text (eg 9.1.12: page 607). It is not clear whether the safeguarding of certain 'riparian' Crossrail sites is still in operation.

Chapter 1C p35: ADD COMMA to aid clarity: "protected, (**comma**) and improved access to MOL....."

Reason: to make clear that the protection of MOL open-ness is a clear major national and regional Policy.

Chapter 2 p45 on Climate Change: Amend: the table proposing a significant reduction in the minimum carbon reduction targets is not agreed:

THE FIGURES SHOULD STAY AS IN THE ORIGINAL DRAFT:

Reason: That the London Plan specifies these lower figures does not mean that the Local Plan has to slavishly follow.

Achieving the higher (Borough) figures still ensures that the values set out in the London Plan will be met, by definition, and the higher local plan figures are therefore considered to be compliant/sound. The London Plan does not say that the Boroughs' Plans cannot set higher targets, only that they must (at least) achieve the levels set in the London Plan.

That an individual Borough can aim to "beat" the "specified from above" target should be a given – see for example the admirable "Merton Rule" energy target adopted by the Borough some 20 years ago, which was adopted by many other authorities, and was a ground-breaker nationally at the time.

P45 CC2.2Eii: **OFF-SITE ADDITIONALITY IS NOT AGREED:** (where a project is not (supposedly) feasible if carbon offsets are not allowed):

Omit: ITEM (ii) SHOULD THEREFORE BE REMOVED IN ITS ENTIRETY:

Reason: Recent independent studies have shown that the off-site carbon offset system world-wide has seemingly very significant flaws, is inherently liable to be unsound, and lacks credibility.

2.4.14 p63: **Support** the new paragraph on Heat Pumps.

CC2 5c p66: **Add:** "Reducing embodied carbon emissions bymaterials, **RE-USING EXISTING BUILDINGS**, and designing buildings shapes and forms":
(Alternatively, this could be given its own paragraph eg 5cc).

Reason: To follow the current approach advocated by the RTPi, the RIBA, and LETI amongst many others, in order to reduce carbon footprint, in accordance with national energy & sustainability policy.

Chapter 3	Colliers Wood:	no comment:	but for p82	see comment on p300 Site Allocations
Chapter 4	Mitcham:	no comment:	but for p116	see comment on p300 Site Allocations
Chapter 5	Morden:	no comment:	but for p197	see comment on p300 Site Allocations
Chapter 6	Raynes Park:		but for p232	see comment on p300 Site Allocations

Site RP3 Tesco: item 5 p240: **Support** "public access along the Pyl Brook for pedestrians and cycles":

Site RP3 Tesco: infrastructure: **Add** "and ensure that infrastructure requirements **INCLUDING RESOLVING THE LEVEL CROSSING OBSTRUCTIONS TO RAIL AND ROAD TRAFFIC** have been addressed":

Reason: Although Crossrail 2 is currently not likely to come about in the time frame of this Plan, this rail line is an important feeder route, and the Crossrail promoters were investigating how the road could be taken under the rail line. This would remove a significant time constraint.

For this to work, their drawings showed that land within the Tesco site would be needed.

So it would be prudent in planning terms to limit permanent development in that corner of the site.

p240 **Support** the restoration of the Pyl Brook Habitat.

p241. **Remove:** The Reference to 52m high buildings is not accepted:

Add: "THE SITE COULD INCLUDE TALLER BUILDINGS OF NO MORE THAN 6 STOREYS".

Reason: Such a high structure would be wholly visually intrusive in what is a low storey height suburban area.

It would also be contrary to the stated Objective (p223) of "respecting local character and amenity".

Also be contrary to Policy N6.1M "resecting local character ... and amenity in surrounding residential neighbourhoods: Also Para 6.1.13.

Site RP4 p243: site allocations: **OMIT:** the suggested **short term use** for commercial/retail/industry is not accepted, and **SHOULD BE REMOVED.**

Instead the site should continue to be **ALLOCATED TO RESIDENTIAL-LED MIXED USE**, with the **INCORPORATION OF A NEW PEDESTRIAN AND CYCLE PATH THROUGH THE SITE** linking Bodnant Gardens to the SW site corner:

Reason: any proposals for short term use can then be considered in that context.

The proposed public pathway through the site would provide a better and safer route, avoiding the severe gradients and traffic danger that now exist over the current bridge.

It would also give better, safer, and more over-looking to the access routes to the Primary and Secondary schools nearby.

p244 Infrastructure should **"INCLUDE A PUBLIC PEDESTRIAN & CYCLE ROUTE THROUGH THE SITE"**.

Reason: as above.

Chapter 7 South Wimbledon:

N7.1c **Support** the addition of "Respect Heritage Assets":

Reason: This is an area that has links to Nelson, and to the early development of the Borough.

p270 Site Wi8 South Wimbledon Station:

Comment: As it is now proposed that South Wimbledon is to be set up independently of Wimbledon, with its own Chapter, should not the Site allocation identification be **"SW1"** rather than **"Wi8"**?

Chapter 8 Wimbledon Park

"Policy" N8.1 p274: See also the separate letter from the Wimbledon Park Residents' Association dated 15 March.

Chapter 9 Wimbledon

P289 **Omit:** The proposed new reference to "supporting tall buildings within Wimbledon Town Centre" **IS NOT ACCEPTED AND SHOULD BE REMOVED.**

Reason: Local people have consistently said over many years that the limit should be around 6 storeys, which is sufficient to provide additional floorspace, encourage controlled development, yet respect and reflect local character.

Also, this is in direct contravention to the stated Objective (p286) to "maintain the unique character of the area, (and) supporting development that is commensurate with the scale".

*Also, authoritative studies by LETI and others are showing that higher buildings use more energy, and are sustainably less efficient. **Croydonisation should not be a model.***

N9.1E **Support** the removal of Hartfield Road and Broadway East from the areas identified as suitable for tall buildings:

N9.1E Omit reference to St George's Road:

Reason: "away from the historic core and located around the station" is sufficient (see also 9.1 8).

N9.1J **Add:** **The removal** of the long-standing Plan Policy to "reduce severance with new bridges over the railway" **IS NOT ACCEPTED, AND IT SHOULD BE RE-INSTATED.**

Reason: The single rail bridge makes the continued safe operation of the town centre highly vulnerable, and the safeguarding of an additional bridge route (at the northern end of the "Centre Court/Wimbledon Quarter" site) has been a long-standing and integral part of previous Borough Plans.

Indeed the service vehicle ramp of the Centre Court project was specifically designed in the 1980's to lead to a future new bridge over the tracks, linking Queen's Road and Alexandra Road.

The current traffic domination of the centre is unpleasant, adversely affects local character, and not in the best interests of the future town. An additional bridge could provide options for traffic, and also for improving the pedestrian environment. What can be lost by continuing this safeguarding?

Safeguarding that route and bridge location should therefore still be included in the Local Plan.

N9.1J **Add:** Whilst supporting the new Policy of reducing traffic dominance in the Town Centre, the wording should include a specific mention of pedestrianisation , eg “by reducing traffic dominance, **ENCOURAGING PEDESTRIANISATION**, and managing **DELIVERY**” .

Reason: as above.

N9.1q p291: **Support** the removal of the “either side of Church Road” AELTC reference: see also the separate letter from the Wimbledon Park Residents' Association dated 15 March.

N9.1.33 p297 **Support** the environmental improvements for Wimbledon Chase:
But the use of the word “lobby” is not considered suitable for a formal Borough Plan, and should instead be replaced by “press for” or “**promote**” or similar.

N9.1.35 p298 **Add:** “..... international significance, **SUBJECT TO THE POLICY ON MOL**, to maintain....”

Reason: Any upgrading of the AELTC facilities must be tempered by the primacy of, for example the maintenance of open-ness, & the continuing prevention of buildings on designated MOL, all in accord with NPPF & London Plan Policy. See also the separate letter from the Wimbledon Park Residents' Association dated 15 March.

p300 Site Allocations diagram: **Support** that the Wimbledon Park land is now not included in the site allocation.

Reason: The MOL and several other designations clearly set the Historic Parkland well apart from the existing commercial, and intensively developed, AELTC site.

p300 **Support** the **OMISSION OF THE PHRASE**“...Site allocations are planning policies....”.

Reason: Planning Policies cover & are applied to the whole Borough, or one of the Town centres. Site allocations are just that – they relate only to the specific site, and are not, and cannot ever be, “Policies”.

Additionally, to be consistent, this omission should also apply to its (in our view incorrect) use in:

- *Colliers Wood p82 N3.1.23*
- *Mitcham. p116 N4.1.17*
- *Morden p197 5.1.64*
- *Raynes Park p232 (6.1.16)*

p300 **Amend:** The proposed removal of the remainder of the two paragraph **IS NOT ACCEPTED AND SHOULD BE REINSTATED**; ie retain “Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site the London Plan”.

DELETE the substituted wording inserted “Identifying sites for a specific land use.....contained in the development plan as site allocations”.

Reason: No justification is offered for using different explanatory wording for all Site Allocations in Wimbledon, as compared with those in the other areas listed above.

There should be consistency.

Also the new wording fails to mention that the Sites are “key potential development sites of strategic importance”, and need to be “integrating well into (their) surroundings”.

p305 **Add:** The **removal** of the proposed reference to **public open space being provided via public realm improvements** is not accepted and **SHOULD BE RETAINED**:

Reason: as the Council document says, this is an area that is deficient in public access to open space. Given that the Theatre Car Park site is in Council ownership, and is currently unbuilt, any future development should be able to incorporate a modicum of public sitting/planting space.

p307 The AELTC section – please see also the separate letter from the Wimbledon Park Residents' Association dated 15 March.

p315 Site Wi6: **Add:** The **removal** of the proposed reference to public open space being provided via public realm improvements **is not accepted** and **SHOULD BE RETAINED:**

Reason: as the Council document says, this is an area that is deficient in public access to open space: any future development should be able to provide a modicum of sitting/planting space for the public, given that the present structure is well set back from the public highway.

p341 Site Wi 16: Centre Court Shopping Centre (now re-named as the Wimbledon Quarter):
item 1: **Support** the introduction of the word “repurposing”:

Regret that the addition did not allow the removal of the somewhat bizarre description of the site as “brownfield”:

Reason: the renovation and re-purposing of the site is proceeding.

Chapter 10: Health and Wellbeing: No Comment

Chapter 11: Housing Provision

General comment: there are a number of references to “we”, as in eg 11.1.20 where the suggested text reads....”following the adoption of this Plan **WE** will publish guidance”. It is suggested that instead, the Plan wording throughout should generally be impersonal: eg along the lines that”following the adoption of the Plan, **published guidance will**”. See for example the correction at para 14.1.15.

p370 11.1.18 **Omit:** The introduction of the phrase “other policy requirements may need to be reduced to compensate for these costs” into the Local Plan **IS NOT ACCEPTED AND SHOULD BE REMOVED.**

Reason: It would lead inevitably to developers attempting to justify daylight infringements to adjoining properties, loss of privacy ditto, higher and out-of-character buildings, loss of open land, and perhaps even building on protected open spaces (eg the Lessa sports ground off Grand Drive).

Reliance on what is now commonly seen as the discredited system of so-called “viability statements” would lead to lower standards and poor planning decisions.

*Instead of using their energy **to** create good designs, the developer will instead be encouraged to “game the system”, and see what lower standards they can get away with.*

If a scheme cannot meet the legitimate design and planning criteria in the Local Plan, then its promoters should go elsewhere. Perhaps returning later when market conditions have changed. The planning system must maintain credibility and respect, if it is to be supported by the public. There is no point in sanctioning poor quality development: we are already having to demolish schemes built inadequately just 40 years ago, hardly a sustainable approach.

p378 11.2.4 **Omit:** The suggestion that “**green spaces**” are a constraint on the supply of housing is not accepted, and should be removed, so as to read: “.....**CHARACTERISED BY A LARGE NUMBER OF SMALL SITES. THESE CHARACTERISTICS.....**”

Reason: Including such a reference in the Plan would be an encouragement to those who wish to build on such green spaces (eg the Lessa sports ground in Grand Drive).

Additionally, the Health and Wellbeing Chapter identifies Access to Open Space and Nature as a major issue (p349) as does the Strategic Policy). O15.1.

Chapter 12 Places and Spaces in a Growing Borough

p408 D12.1.1 **Support** the reference to supporting documents produced by other bodies:

Add: However, given the growing encouragement for positive involvement by local people, it would be desirable to include a reference eg “.....Good Practice Advice Notes, **AND PUBLISHED DESIGN GUIDES FROM LOCAL GROUPS. These provide detailed guidance and advice....**

Reason: In the past, the Council has formally adopted such guidance eg a planning Brief produced by the Society (Atkinson Morley site), and also utilised the many local road townscape surveys by the Society and local groups.

- p411 D12.2B **Amend:** The proposed **removal** of the policy on the permeability of new development to pedestrians and cyclists **is not accepted**, and **SHOULD BE RE-INSTATED**.
Reason: blocks to easy public movement through the Borough can be alleviated by the incorporation of new routes, and the Council's original wording has much merit.
- p411 D12.2F **Amend:** The proposed **removal** of the policy on identifiable public spaces is **NOT ACCEPTED AND SHOULD BE RE-INSTATED**.
Reason: the importance of clearly defining public and private spaces has been a cornerstone of 'designing out crime' for some years, and has credibility in use. The Council's wording has merit.
- p412 D12.2M **Support** the inclusion of the sustainability approach to design.
- p418 D12.3F The proposed **removal** of the policy on providing appropriate levels of daylight and sunlight to adjoining buildings and gardens is **STRONGLY RESISTED AND SHOULD NOT BE ACCEPTED**.
It should BE RE-INSTATED USING THE SPECIFIC WORDING "AND GARDENS".
Reason: Constantly one sees proposals that severely adversely affect the daylight and privacy of the neighbouring properties, contrary to (for example) the standards set out in the definitive BRE document on Daylight and Sunlight 2022.
EG: On each common boundary, a new building should not penetrate an inclined plane of 43 degrees from the top of a 1.6m notional fence (ref: 2.3.10a). (* This phrase is specifically used by HMG in the current public consultation on Permitted Development).*
In designing a new development it is important to safeguard the daylight to nearby buildings (2.2.1) And also to gardens and open spaces (3.3.1).
That developers (and even skilled building professionals) consistently fail to understand these most basic neighbour protection standards in their planning applications is a constant source of concern for neighbours, for local people and for the Society.
There is a failure to understand the basic requirements, that daylight and privacy standards need to be respected to the whole of an adjoining site (not just the property windows), and this policy (currently DMD2 in the 2014 Local Plan) is the only "protective guidance" that Councils, (and those affected by development proposals, and local people) have.
*The Council's current approach **has great merit** and should continue.*
- p418 D12.3f **Relocate:** Rather than be classed as people-focussed, might this policy be better located within the "context" or building design section, being easily measurable in physical terms?
- p418 D12.3c **Add:** This suggested Policy should be **EXPANDED TO INCLUDE THE NEED TO AVOID THE SHADOWING OF THE SOLAR PANELS ON ADJOINING PROPERTIES**.
Reason: Solar Panels work properly only when direct sunlight reaches them, and shadowing by new adjoining development needs to be avoided. The generation of electrical energy, its use in the building, and its exporting to bolster local energy production should now be prioritised.
If 10 or 12 solar panels were installed in only half (c5,000) of the current stock of semi-detached houses in Merton, the projected electrical energy generation could approach some 15 million kWh annually by 2050.
The potential generation from roof top PV's on housing in Merton might approach 50-80 million kWh by 2050. Therefore, when designing new development, the protection of existing or potential future rooftop Solar Panel generation on neighbouring properties (including non-residential) should now be seen as highly sustainable, and comparable in importance to protecting their daylighting.

- p423 D12.3.6 **Add:** The proposed text should include a reference to “providing good levels of daylight into the dwellings” but also to their sites/gardens, ie **“PROVIDE A GOOD LEVEL OF DAYLIGHT AND PRIVACY TO BOTH DWELLINGS AND GARDENS”**.
Reason: as for D12.3F above.
- p432 D12.5A ii. **Add:** The **removal** of the reference to Merton’s Conservation Area Character assessments and guidance etc **IS NOT ACCEPTED AND SHOULD BE REINSTATED**.
Reason: These documents contain a wealth of local knowledge and understanding, something that no developer can hope to match.
Local groups (including the Society) have themselves contributed to this invaluable stock of information over many years, and it should continue to provide a resource for both developers and their architects.
Indeed, many applicants currently use these assessments in their D & A Statements.
- p435 **Support** the addition of Locally Listed Buildings etc as Heritage Assets (see comment at Appendix: 7.4.2).
- p435 12.5.6 **Update:** As the Archaeological Priority Zones have been superseded, should not the entry now read **“ARCHAEOLOGICAL PRIORITY AREAS WITH TIERS 1, 2, OR 3 (DESIGNATED HA)?**
Reason: Archaeological Priority Area Tier 4 is a ‘catch-all’ covering the whole of the Borough that is not in Tiers 1, 2, or 3.
So without this qualification the whole of the Borough would become a Heritage Asset.
- p437 D12.6.1ABE **Omit:** The reference to tall buildings being suitable for parts of Wimbledon Town Centre is not accepted. Instead, a height limits Policy should be established.
The phrase **“and Wimbledon Town Centre”** therefore **SHOULD BE REMOVED**.
*Reason: Local people have consistently said that buildings above about 6 storeys are not needed or desirable, are out of scale, and create an inappropriate identity and character. Also, authoritative studies are showing that higher buildings **use more energy**, and are **sustainably less efficient**.*
- p442 **Strategic Heights Diagram:** **Support** the suggested references to “Subject to all other Policy requirements” in the key panel.
This makes clear that higher structures are only acceptable when other Policy constraints are met.
- p442 **Omit:** The indicative location of **tall buildings up to 40m IS NOT SUPPORTED**.
In any event the **dotted orange boundary of the western section would anyway need to be SIGNIFICANTLY RE-DRAWN, AND MINIMISED:**
- to **avoid going outside the defined Town centre:**
 - avoid including Tabor Grove, St George’s Road and Ashbourne Terrace, which all have small scale properties/housing:
 - It should entirely **avoid the Queen’s Road and Broadway properties in the Wimbledon Broadway Conservation Area**, with their Listed and Locally listed buildings:
(the dot indicating the Locally Listed Police Station seems to be missing):
 - It should entirely **avoid sites Wi 16 and Wi 11**, (both of which are partly within the conservation area):
 - It should entirely **avoid including properties that lie between the two Conservation Areas of Wimbledon Broadway and South Park Gardens:**
- Reason: the introduction and encouragement of very much higher buildings within and beside these conservation areas would significantly damage their inherent character and design quality.*
This is contrary to Strategic objective 5g, Policy N9.1e (which protects the historic WTC core from taller building), Policy N9.1 item o (which promotes conservation area protection), and Policy D12.5bcdef..
To be consistent, the various site descriptions need to be amended accordingly (p301 – 345).

- p442 **Omit:** The indicative location of **tall buildings of up to 48m IS NOT SUPPORTED:**
This reference should be **removed entirely.**
*Reason: as above for p437 – p442. **Croydonisation should not be a model.***
- p444 12.6.6 paragraph 4:
Omit: Asking developers to produce design briefs for their development site is both naïve and wrong.
It is analogous to “marking one’s own homework”, and **IS NOT SUPPORTED.**
Reason: As Michael (now Lord) Heseltine recently wrote: “The Market has no morality” (6/2023).
Add: Such briefs should be produced by the Council as planning authority, ideally with local involvement.
Accordingly, the text should instead read: “**PLANNING AND DESIGN BRIEFS WILL BE PREPARED FOR THESE SITES BY THE COUNCIL IN CONJUNCTION WITH LOCAL GROUPS.**”
Reason: Central Government has rightly been promoting the early involvement of the public in the design of development projects (eg NPPF 40 and 131).
The production of planning guidance for intending developers should be seen as an essential role of the local planning office, acting positively, and taking advice from local groups and interests.
Local people should be given the opportunity to be involved in the production of design briefs, rather than being left for Councils and developers to produce in secret.
The public planning system designs and plans the town, the scheme architect plans and designs the building: not the other way round. As someone once said: Whose town is it anyway?
- p444 12.6.6 paragraph 6: The seemingly tacit acceptance that “harm” to the historic environment can be acceptable, provided that enough so-called “justification” is provided **IS NOT SUPPORTED.**
Omit: Instead, the policy and paragraph should simply read “.....**TALLER BUILDINGS SHOULD AVOID HARM TO THE SIGNIFICANCE OF HERITAGE ASSETS**”.
Reason: National Policy on the protection of heritage is clear, and giving “ways round” such a Plan Policy makes it worthless in practical use.
It is counter-productive, and would lead to mis-use and loss of heritage.
Firmly controlling taller buildings in relation to the historic environment should be a given.
“Once lost, heritage is lost forever”.
- p445 D12.7 para A: **Add:** The **omission** of “the character of an area” **IS NOT SUPPORTED, and SHOULD BE REINSTATED.**
Reason: Local Character is not the same as “amenity”. The Council’s wording has merit.
- p447 D12.8C vi Digital Infrastructure: **Add:** It would be helpful if the supporting text on p448 could specifically say that, because the (usually five) current equipment boxes beside the masts are large, ugly & uncoordinated in design, design-led solutions are very much needed.
Reason: Such equipment – largely within the public highway - is very visible, and the current design quality is unthinking, and a significant blot on the landscape.
National priority for the expansion of the system should be matched by a need for high grade industrial design in the townscape.
- p449 D12.9Dii **Support** the new approach to the installation of near-solid shop front shutters.
- p454 D12.11J Basements: **Add:** To the suggested text should be added: “**SEWER FLOODING. PERMISSION FOR NEW BASEMENTS WILL NOT BE APPROPRIATE IN DEFINED FLOOD ZONE AREAS**”.
Reason: to reduce risk, both to people (eg bedrooms where sleeping or immobile occupants can be overwhelmed) and to property.

- p457 D12.10.16 New Basements under Heritage Assets: **Add:** Suggested addition to the revised text: “.....without causing harm to the significance and structural integrity of the asset, **AND ITS IMMEDIATE NEIGHBOURS.** Where a level of harm ...”
Reason: particularly in a terrace of old cottages etc, where the original foundations are by modern standards minimal, the introduction of a new strong basement foundation in one property inevitably leads to movement in the adjoining weaker foundations, and disturbance to the building above.
- p458 12.10.19 **Omit:** The suggested new phrase that basements “will be supported” in conservation areas **IS NOT SUPPORTED.** Instead it should read “will **ONLY** be supported if.....”.
Reason: basements are potentially disruptive to building character, structural stability of neighbouring property, and hydrology, and should only be accepted if they pass clear critical criteria.

Chapter 13: Economy and Town Centres

- p490 13.5c New Map of centres: **Add:** It would be helpful if the new map could include (perhaps by a simple symbol) the location of **SIMILAR CENTRES IN THE ADJOINING BOROUGHs:**
Reason: A London Borough is not an island, and the entirely normal crossing of boundaries for recreation, for shopping, for education etc etc should ideally be reflected in the map.

Chapter 14: Infrastructure

- p509 14.1.15 **Add:** The Council should work with the water companies to ensure that there is adequate water and waste water infrastructure **TO SERVE THE BOROUGH** (not just “new developments”).
*Reason: the present drainage infrastructure is clearly not sufficiently robust, (eg flooding at Raynes Park), and needs significant capacity upgrades.
Climate Change is predicted to generate more “surplus water events”.
The great majority (c80 - 90%?) of the Borough will not be developed over the next 30 years, and relying on just “new development” to deal with the need to significantly upgrade our largely Victorian system is clearly not enough.*

Chapter 15: Green and Blue Infrastructure

- p535 O15.3 **Support** the addition of the references to improving biodiversity.
- O15.3d **Support** the addition of a 10m wide buffer strip beside a watercourse. (*spelling “where”*)
- O15.3f **Add:** Restricting the responsibility for addressing access to nature to only “major” development **IS NOT SUPPORTED.** The Council’s original wording (“**ALL**”) should be retained.
Reason: In the same way that lost trees are required to be replaced in development projects (see O15.4f below), so should the loss of nature be compensated for in virtually all developments.
- p541 O15.4b **Add** to the suggested revision, last line: “...a financial contribution of the full cost of appropriate re-provision **WITHIN THE BOROUGH** will be required.”
*Reason: to clarify that the nature benefit should stay in the Borough and not be exported to an outside agency. Mind-full of the somewhat discredited system of carbon offset payments, which seemingly “export” benefits via intermediaries to where they are ‘out of mind’, **local re-provision** ensures that the finance, as well as the product, can be locally and properly monitored by the Council.*

p542 O15.4f On replacement trees, **Add** “.....of amenity **AND ECOLOGICAL** value, to consist of appropriate species native to the UK **AND OF A TRUNK GIRTH THAT MATCHES THE GIRTHS OF THE LOST TREES”**.

Reason A: Adding ‘ecological’ reflects the growing understanding that the planning system should not limit tree protection to “amenity” (ie appearance), but now include a rather wider view of nature.

Reason B: To ensure that the loss of what often are significant mature trees is not “balanced” by the introduction of the same number of saplings, which have no chance of emulating the ecological, scenic, and aesthetic benefit of the lost trees for perhaps 30 or more years.

A case could be made for not just matching girth, but for a say 50% increase in conservation areas, and a 100% increase for lost TPO trees.

(This girth-replacement approach is known by the Society as the “Luckhurst Principle”, named after the Council’s late Arboricultural Officer, who advocated this approach).

p572 P15.10 Supporting Text: This reads as a Policy, & should therefore ideally **be relocated** to para ff.

p575 P15.10.7 Note “we” and “us”.

p578 P15.10.23 **Support** the addition of a construction and noise etc SPD.

Chapter 16 Sustainable Travel

p588 T16.2.4 **Support** the inclusion of the Council’s own assessment that “cycle and pedestrian provision in Merton **is not of adequate standard in all areas”**.

Support: for the “production of a cycling and walking strategy..... setting out detailed proposals for cycle and pedestrian routes”.

T16.2.4 **Add** to the suggested text revision:“detailed proposals for cycle and pedestrian routes **INCLUDING SOME PEDESTRIANISATION IN TOWN CENTRES** over the Plan period”.

Reason: Networks link places, and many of the places are local and town centres.

Almost all are dominated by traffic, and this is hampering not only the viability and character and safety of the centres, but discourage natural walking for pleasure.

Positively improving the pedestrian experience has been a powerful tool in rejuvenating many town centres throughout western Europe since the 1970’s, and the Plan should encourage it.

If the centre is uncomfortable and unwelcoming for pedestrians, they will not stay there, they will “shop and go”. Retaining footfall is one of the essential requirements for a resilient town centre.

pp607-9 **List of Transport Schemes:** **Support** for the revised texts on TN 1, 2, 3, 4, 8, 9, 11, 12, 13, 14.

Chapter 17: Monitoring

p611 17.1.5 **Add:** The list of bodies and agencies that the Council will “work with” should surely include **LOCAL GROUPS?**

Reason: “Our Town Our Plan” should be the mantra. The town is an expression of local peoples’ identity, the recognisable physical focus of their community. Pride in their town is key to its continuing success.*

** This indeed was the title of the comprehensive Plan produced by the Society and some 19 local groups in 1984, to counter the much-opposed plan by the then Council.*

p614 – p684 70 numbered pages not present

p686 **Add:** It would be helpful if each column on each page could have its title.

p687 **Add:** Should Air Quality fall below target levels, then an additional Local Plan Policy initiative could include **T16.2.4 (PEDESTRIANISATION), T16.2.4 (IMPROVED CYCLING AND WALKING):**

Reason: Whilst producing new Council documents may sometimes help, positive action by the Council with its direct power to act, has an important part to play.

Words sometimes need to be backed up by positive intervention.

- p688 **Add:** Should Biodiversity fall below target levels, in Contingency (c) **“THE COUNCIL WILL CONSIDER ACQUIRING SUITABLE LAND AREAS FOR APPROPRIATE ENHANCEMENT”**: (eg Lessa Sports Ground?)
Reason: whilst the production of new Council documents may sometimes be needed, initiating on-the-ground positive action by the Council, together perhaps with local guerrilla gardening groups, has a part to play, setting an example, leading from the front.
- p691 **Add:** Should Heritage and Archaeological and Landscape fall below target levels, then in (c) **“THE COUNCIL WILL CONSIDER ACQUIRING THE HERITAGE ASSET, AND UNDERTAKING THE REMEDIAL WORKS”**.
Reason: The Council has clear powers to intervene, where deterioration of the asset is not able to be remedied by its current owners.
- p694 **Add:** Climate Change: **Indicators should also include: numbers of solar panels installed: ditto heat pumps: reduction targets for gas importation into the Borough: amount of locally generated electricity within the Borough:**
Reason: Such simple targets can be a practical and easily understood measure of progress towards 2050.
- p694 **Add:** Climate Change: Contingency column **should include “THE COUNCIL WILL PROMOTE/SUPPORT GROUP-BUYING SCHEMES FOR SOLAR PANELS & HEAT PUMPS”**.
*Reason: Group buying schemes can lower the price and guarantee the quality of work.
The solar panel group-buying scheme recently run by the Council (with other SW London Councils) has been very successful in encouraging wide take-up, and this should be accelerated.*
- p697 **Add:** Sustainable Transport: Monitoring information **SHOULD INCLUDE (D) LENGTH OF FULLY SEGREGATED CYCLE PATHS”**.
Reason: Given that the present cycle network is “not adequate” (in the Council’s words), and upgrading it is part of the Plan (T16.2.4), then progress towards achieving the segregated network needs to be monitored.
- p701 **Add:** Safe Environments: The Monitoring indicator column **SHOULD ALSO CONTAIN FIGURES ON CRIMES** against the person and/or property as (b).
Reason: Unsafe places need identification and remediation.
- p702 Design: A poorly designed environment will in part be identified by local people whose town it is. Involvement by the public in the evolution of development projects needs to be commonplace. **ADD AS (A) “INPUT FROM THE DESIGN REVIEW PANEL AND LOCAL AMENITY GROUPS”**.
*Reason: Their assessment and ideas for improvement should be regarded as a resource rather than an irritant.
The developer only owns the site, but the local community “owns” and lives and gives life and prosperity to the town and the wider locality.*
- p704 Economic Growth and Town Centres: **Amend:** The Topic (first column) should not be to “increase” the vitality and viability etc, but to **“ENSURE”**.
*Reason: the pursuit of “increase” can lead to overheating of the development market, the creation of out-of-scale crude developments so as to maximise CIL payment receipts, and loss of character: followed by even more decline.
Croydonisation should not be a model.*

- p742 **ADD:** The Schedule of Locally Listed Buildings (a non-designated Heritage Asset).
Reason: As these are specifically mentioned in 12.5.6 they need to be included.
- p707 **Appendices:** None of the following have been checked for completeness or accuracy in the limited time available:
Superseded Policies Table
Open Space – MOL
Open Space – Allotments and Farms
Open Space – Churchyards and Cemeteries
Open Space – Education
Open Space – Other
- p721 Nature Conservation –
Site of Special Scientific Interest (SSSI)
Special Areas of Conservation (SAC)
Sites of Metropolitan Importance for Nature Conservation
SINC
Site of Borough (Grade 1) Importance for Nature Conservation
Site of Borough (Grade 2) ditto
Site of Local Importance for Nature Conservation
Local Nature Reserves
Green Corridors
- p727 Metropolitan Open Land (MOL) boundaries and changes
Cannon Hill
Lower Morden
Beverley Brook (query is the map correct?)
Copse Hill
Wimbledon Common (no changed boundaries)
Mitcham Common (no changed boundaries)
Morden Park
Wandle Valley
- p741 Conservation Areas
Historic Parks & Gardens
- p742 Listed Buildings grades 1, 2* and 2
Archaeological Priority Areas (APA's) Tier 1, Tier 2, Tier 3
- ADD: THE SCHEDULE OF LOCALLY LISTED BUILDINGS** (a non-designated Heritage Asset)
Reason: As these are specifically mentioned in 12.5.6, they need to be included.
- p752 Scheduled Ancient Monuments
- p753 Flooding Tests and Assessment
Employment Opportunities
Marketing and Vacancy criteria
Glossary
- p792 Policies Map: This has not yet been made available on-line.

This ends the Society's Consultation Responses to the Inspectors' proposed Main Modifications to the Local Plan.

Should the Inspectors have any questions that the Society could respond to, then please let us know.

Yours sincerely

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

cc Programme Officer

Please send all correspondence by email to