



# RAYNES PARK AND WEST BARNES RESIDENTS' ASSOCIATION

SERVING THE COMMUNITY SINCE 1928

## **Review, Comments and Recommendations for the London Borough of Merton, Draft Local Plan (issued July 2021) made by the Raynes Park and West Barnes Residents' Association.**

### **Introduction**

The Raynes Park and West Barnes Residents' Association (RPWBRA) has a membership of 1800 households in the Raynes Park and West Barnes wards. Our association was founded in 1928 and has served its local community on a continuous basis ever since.

One of the principal reasons for its formation in 1928 is that part of the area was subject to flooding, a situation that, unfortunately, continues to this day.

Therefore, the RPWBRA considers that the following urban planning objectives are crucial for our area and we expect Merton's Local Plan to robustly promote and defend the following:

- Preservation of green spaces,
- Use of sustainable urban drainage,
- Proper maintenance of existing drainage, water courses and infrastructure,
- Preventing the loss of porous ground surfaces caused by all forms of development, across the complete spectrum, from minor private works to major developments.
- Control of storm water run-off,
- Protection of the natural environment,
- Encouraging the planting of trees and vegetation,
- The drive to Net-Zero Carbon.

Therefore, with these and other concerns in mind, we make the following observations on Merton's Draft Local (Issued July 2021).

### **Section 02 Climate Change**

The RPWBRA fully supports LBM's objectives behind the Policies in this section. Decisive and prompt action need to be taken now to drive towards a net-zero carbon society and economy by 2050.

We therefore make the following comments.

**Policy CC2.4, Section b. iv.**

The increased use of heat pumps should not be at the expense of other design and environmental considerations. Proposals for the use of heat pumps should also include assessment of the architectural appearance and noise emissions. All such design implications should be properly considered and assessed, with a standard noise emission condition of “not to exceed LA90-10dB at the nearest residential boundary”.

**Policy CC2.5, Para 2.5.90**

In keeping with the Climate Change Emergency, we urge that the Whole Life-Cycle Carbon Assessment should be set as a standard requirement for all new developments and refurbishments, apart from the very small.

Bearing in mind the large number of relatively small new developments that are anticipated to comprise the majority of new builds and refurbishments in Merton, we consider that the threshold of either 30 dwellings or 1,000 sqm is far too high and should be reduced to a much lower level, otherwise this aspect of **Policy CC2.5** may be largely ineffective. We note that the Economic Policy EC13.4 is set at 10 dwellings or 1,000 sqm and consider this to be a far more appropriate threshold.

We recommend that the assessment of Embodied Carbon should also include proof of how it has informed and influenced the resulting design, selection of materials, construction method, consumed energy and generated waste.

**Section 06 Raynes Park**

**Policy N6.1, Para 6.1.8**

This section, dealing with flooding risk, should also refer to the Flood Risk arising from the Pyl Brook and should include reference to Brook Close, Greenway, Linkway, West Barnes Lane, Westway and Westway Close.

**Policy N6.1, Para 6.17.**

In order ensure good quality dwellings with adequate internal space, we recommend that the conversion of single dwellings into multiple units should only be permitted for single dwellings in **Council Tax band F** or above. This would also protect the area from the gradual loss of existing medium-sized family homes.

Also, because much of the Raynes Park area is already subject to car parking stress, where an existing single unit is converted into multiple units, the residents in such properties should not be eligible for parking permits, either in existing CPZs or where CPZs are subsequently introduced.

For similar reasons, such dwellings should also provide secure bicycle storage areas and sufficient storage for food waste, household waste and re-cycling wheelie bins, boxes and other waste receptacles.

#### **Site RP2 245 -247 Burlington Road**

The **Design Guidance** should make reference to the proximity of the Sacred Heart Primary School and require developers to liaise with the school governors and ensure any concerns are addressed by the design.

#### **Site RP3 Tesco, Burlington Road**

The **Design Guidance** should make reference to the proximity of the Sacred Heart Primary and Raynes Park High Schools and require developers to liaise with the school governors of each school and ensure any concerns are addressed by the design.

#### **Site RP4 80 – 86 Bushey Road**

We note that the first sentence of the **Site Description** is incomplete, as it ends with the verb “demolish”.

#### **Site RP6 Former LESSA Sports Ground in Greenview Road, off Grand Drive.**

We note that the **Existing Uses** reads “The consultee’s submission states that ... there is no interest in the site being used solely as sports fields.”

The Raynes Park and West Barnes Residents' Association strongly refutes this assertion and to ensure proper balance in an official document of the London Borough of Merton, we urge that our opinion should be given equal weight in this description of the site.

### **Site RP7 Rainbow Industrial Estate**

The **Design Guidance** states “Planning permission was granted in 2015 ... for the provision of a 'kiss and ride'. The scheme is now being phased and the business floorspace and kiss and ride have been implemented.”

This statement is incorrect.

We draw attention to the fact that the construction of the kiss and ride is not complete, as the removal of the electricity substation to accommodate the mini-roundabout has yet to be done. Also the site is not maintained to an acceptable standard for its intended use by the public, as it is now used for private car parking and the pedestrian refuge at the entrance is damaged.

### **Section 13 Economy and Town Centres**

#### **Policy EC13.2, Para 13.2.16**

We recognise that some businesses may need to operate HGV movements without the constraint of restrictions that would otherwise be necessary if they were located in residential areas.

However, as part of Policy EC13.2, such business should be required to route their HGVs in compliance with existing restrictions, such as London Lorry Control Scheme.

For example, this scheme bans HGVs over 18 tonnes from using Grand Drive, SW20, between 9 pm and 7 am on weekdays and 1 pm on Saturdays until the following Monday at 7 am. However these restrictions are regularly breached by HGVs accessing neighbouring industrial areas, such as Garth Road.

#### **Policy EC13.4, Section c**

With regard to the proportion of jobs created by construction, this policy should include the recognition that, with “Modern Methods of Construction”, many of the jobs created during the construction phase may be located in off-site pre-fabrication facilities and in other local authorities.

#### **Policy EC13.4**

We concur with the objectives of this Policy that endeavour to protect scattered employment sites from development that would otherwise result in the loss of employment opportunities.

### **Policy TC13.5**

We are pleased to note that both Raynes Park and Motspur Park are classified as Local Town Centres and that this policy endeavours to encourage and preserve the importance of these centres in the local economy.

## **Section 14 Infrastructure**

### **Policy IN14.1, Paras 4.1.15 & 14.1.16**

Premises, property and businesses in the Raynes Park and West Barnes wards have repeatedly seen flash flooding in 2020 and 2021.

Bearing in mind that most of the local drainage infrastructure was constructed in the 1930's, it now has insufficient capacity due to 90 years of:

- Growth in population and density of development,
- Increases in hard surfaces and loss of open spaces,
- Increases in water usage per capita.
- Increased precipitation, due to Climate Change.

The frequency of these flooding events demonstrates that the existing surface water drainage infrastructure in Raynes Park and West Barnes is proving to be increasingly inadequate.

Taking into account its financial and business pressures, we question the reliability of Thames Water to make unbiased assessments of its available spare capacity to cater for proposed developments.

Therefore, developers should not be able to rely on Thames Water's own assessment of available capacity but should carry out their own assessment, to be undertaken by an independent consultant.

### **Policy IN 14.2, Paras 4.2.12**

We strongly recommend that sports and leisure facilities should be added to this list.

## **Section 15 Green and Blue Infrastructure**

### **Policies O15.1 and O15.2, Open Space, Green Infrastructure and Nature Conservation**

**The RPWBRA has important and crucial comments and recommendations concerning Section 15 and the supporting maps and appendices, as follows:**

1. We note that within Strategic Policy O15.1, Merton aims to protect and enhance open spaces, green infrastructure and nature conservation and that the Borough will do this by protecting and enhancing open spaces in the borough, including Metropolitan Open Land, parks, other open spaces and areas of nature conservation to provide high quality environments for all residents.
2. RPWBRA fully support these policies for protecting and enhancing open spaces in the borough, including **Metropolitan Open Land (MOL)**, parks, other open spaces and areas of nature conservation.

**However, we are therefore extremely concerned that several component documents in the Draft Local Plan are not consistent with this policy. For example, we note the following:**

- Section 17 Appendices, Page 585, which lists MOL areas, is extremely incomplete. There are numerous omissions from this list when compared to the Green Infrastructure map (Map 2), which is far more detailed.
- The text describing proposed changes to MOL for some areas is confusing, as it unnecessarily raises questions of the continuing status of adjoining area.
- The indistinct colour rendering and hatching of the Green Infrastructure map (Map 2) and detailed area maps (e.g. Open Space and MOL Map (Raynes Park and Morden) and Open Space and MOL Map (Wimbledon) may be a cause for confusion.
- Justification 15.1.1 makes reference to Chapter 8, which does not exist.

3. With regard to the Raynes Park Area, we observe the following **omissions from the MOL list on page 585**.

**In Motspur Park area:**

- Sir Joseph Hood Memorial Playing Fields,
- Old Blues Rugby Football Ground,
- KCS Sports Ground,
- Merton and Sutton Cemetery
- Morden Cemetery,
- and other contiguous areas, including Derwent Floodwash, land west of Meadowsweet Close and old nurseries at the end of Arthur Road .

**Bushey Mead area:**

- Cannon Hill Common,
- Prince George's Playing Fields,
- Raynes Park Vale FC,
- Joseph Hood Recreation Ground,
- Messines Playing Fields,
- and other contiguous areas, including Martin Way Allotments. .

**Coombe Lane area:**

- Raynes Park Recreation Ground
- Old Wimbledonians and Donhead Sports Ground,
- and other contiguous areas.

**Grand Drive:**

- AELTC Community Sports Ground,
- and other contiguous areas, including the land at the rear of 274-312 Cannon Hill Lane

The above is not an exhaustive list and does not cover the whole borough. However, for the avoidance of doubt, we urge that the MOL schedule and subsequent schedules on pages 585 – 602 should be far more detailed and explicit.

Otherwise, there is a high risk that the MOL status of these and many other areas may be called into question and the objective in the London Plan to give MOL the strongest protection could be undermined.

4. With regard to the loss of MOL Status for particular areas, we note that there are proposals to remove the MOL status for parts of the AELTCC site in Church Road, SW19, (ref: **Site 3: All England Lawn Tennis & Croquet Club (AELTCC), Wimbledon**). We observe that sections 3.11 and 3.12, make reference to Wimbledon Park Golf Course and therefore raise uncertainty over its continued MOL status. However, we also note that Map 2 LR, Green Infrastructure Policies shows that the Golf Club retains its MOL status.

We are aware of approaches made by interested parties to **remove MOL status from part of Wimbledon Park Golf Club**. We are therefore extremely concerned that the London Borough of Merton will be swayed by landowners of MOL to remove the designation, in order to increase land values and enable exploitative developments.

**We therefore urge that this matter needs to be explicit in stating that Wimbledon Park Golf Course will retain its MOL status, irrespective of whether it is used as a golf course or not.**

5. **The same principle applies to all existing areas of MOL and we urge the London Borough of Merton to resist all such lobbying and be robust and forceful in its protection of all existing Metropolitan Open Land.**
  
6. **Green Infrastructure Policies Map 3 – Green Corridors**

This map should include the following Green Corridors:

Bushey Mead Area:

- Prince George's Playing Fields,
- Raynes Park Vale FC,
- Messines Playing Fields,
- Cannon Hill Common
- and other contiguous areas, including Martin Way Allotments. .

Cannon Hill Area:

- Cannon Hill Common,
- Joseph Hood Recreation Ground,

Grand Drive Area:

- AELTC Community Sports Ground
- Former LESSA Playing Field (off Meadowview Road)

Raynes Park Area:

- Raynes Park Recreation Ground (off Taunton Avenue)



**Policy F15.7 Flood Risk Management and Sustainable Drainage**

**Policy F15.8 Managing Local Flooding**

**Policy F15.9 Sustainable Drainage Systems (SUDS)**

The RPWRA is located in an area which is subject to flooding. In particular, in 2020 and 2021 there have been several instances of flash flooding. We are concerned that, despite planning conditions recently imposed on developers to mitigate surface water flows from new developments, when it comes to the test, such measures are proving inadequate.

Measures to mitigate surface water run-off need to be robust in design, future proofed and properly maintained in the long term. We fear that a simple maintenance plan submitted as a planning condition is insufficient to ensure their long term effectiveness, taking into account the increasing demands of ongoing climate change.

We recommend that planning conditions should require owners to carry out independent annual inspections, assessment of continuing effectiveness and implementation of any recommendations for such flood and run-off remedial measures.

J R Cuthbert, Committee Member,  
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