

Development Control
Merton Council
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20 May 2022

For the attention of David Gardener

Dear Mr Gardener

22/P0812 - 81/83 WIMBLEDON HILL ROAD, SW19 7QS

This site adjoins the Wimbledon Hill Road Conservation Area, and a Tree Preservation Order (MER 3) applies.

The application involves the demolition of the existing Edwardian property and the construction of 18 flats and 3 houses. A previous application (21/P0019) was refused on grounds which included overlooking, parking over-provision, lack of social housing.

The energy proposals include the provision of a number of ground source heat pumps and rooftop solar panels, an approach which appears significantly better than many similar development proposals.

The Society has a number of principal concerns.

Firstly, there is a significant loss of trees, contrary to Local Plan policy DM O2E which requires " ... replacement planting (of trees) of a **greater value to that which has been lost**".

Also, Policy DM D2A/9 says that trees are to be protected in new developments. The trees to be lost are of significant size: for example, T1 is an Ash some 19m high: T3 an Indian Bean of 12m height: T9 is a Horse Chestnut of 21m height: T10 a Hornbeam of 14m height, and there are others.

The combined ages of these lost trees, considering their quoted trunk girth as well as their height has not been shown, but is likely to be 250 "tree years" or more.

The Council will be aware that the Society view is that lost trees (noting Policy DM O2E above) should be replaced by a greater number of "tree years" (details in the Society responses to the new draft Local Plan) either on site, or if that is not practicable, gifted to the Council for planting elsewhere locally.

The simplistic references in the tree report to "replanting" would simply mean that the standard 10-year old young trees (totally perhaps 40 -50 years growth) would be planted, which is considered to be grossly inadequate.

Secondly, the amount of natural and unbuilt ground that is currently proposed would measure only about a third of the site area, being the back garden communal area and the two small front garden spaces (the various narrow strips being discounted).

These proposals are therefore considered to be **overdevelopment** and not in accord with Policy DM D2A8 which requires the " *conservation and enhance(ment) of the natural environment, particularly in relation to biodiversity, wildlife and **gardens***".

Thirdly, flat 1 being in a basement level, has a light well serving the two bedrooms, but this light well appears to be roofed over by the projecting floor of unit 5 above.

The same appears to be the case with flat 4, over-sailed by flat 7.

Although not clear from the information provided, may there also be overlooking of the existing windows of the adjoining flats only some 8m away?

Fourthly, there does not appear to be any provision for the extensive needs of the refuse and recycling facilities that would be needed for 21 homes.

In other similar developments this has led to the ad hoc and intrusive construction of large containing sheds in what were supposedly to be green front garden spaces.

On this site this would be visually highly intrusive, adversely affecting not only the trees, but the amount of greenspace, and the amenity of the basement and ground floor flats.

Fifthly, the incorporation of Social Housing to the normal level should be a given.

Lastly, in any revised scheme, there should be an assessment of the geological situation, given that the site is on a hill and the possibility of rotational failure needs to be assessed, as well as any effect on ground water.

The applicant should be encouraged to significantly amend the scheme accordingly.

Yours faithfully,

Chris Goodair
Chair, Wimbledon Society Planning and Environment Committee