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## MITCHAM [BISHOPSFORD ROAD] BRIDGE Representations to Merton Council on proposals for a replacement bridge Planning Application 20/P2438 September 2020

1. Mitcham Cricket Green Community & Heritage and Mitcham Society are the two civic societies for the area and Wandle Valley Forum provides support and an independent voice for over 140 community groups and voluntary organisations and for everyone who shares a passion for the Wandle.

2. The opportunity to design and construct a new bridge over the Wandle is a rare and special one. This is an historic site marking the original crossing of the Wandle at the gateway to Mitcham and the bridge being replaced was 260 years old. Its significance is recognised by its location within the Wandle Valley Conservation Area and it is positioned on the Wandle Trail in a green corridor within the Wandle Valley Regional Park.

3. As a £2.7m scheme the new bridge is included in the Infrastructure and Projects Authority's National Infrastructure and Construction Procurement Pipeline 20/21. Given this scale and the historic significance of the crossing it is all the more important that the proposals are developed in collaboration with the local community and relevant groups. This has not occurred and in the 19 months since the previous bridge was damaged in June 2019 there have been just a few weeks of limited public consultation on the future plans. Of the six options considered at the outset only two have been consulted on and neither of these included the option of felling trees and demolishing the historic brick wall protecting Ravensbury Park and the Wandle Trail from visual, noise and vehicle pollution. Our efforts, on several separate occasions, to engage with Merton Council on both the design and future historical interpretation have been ignored. The option selected to be put forward in this planning application was not supported by a majority of those responding to the consultation that has taken place.

4. We support the environmental and other benefits of a single span structure. There is a strong case for retaining an arched structure reflecting the historic role of this crossing but we recognise that downstream views are obstructed by the separate footbridge and upstream views will benefit from the integration of the more recently constructed existing footway into a single structure.

- 5. Other aspects of the plans are more problematic and the scheme being proposed:
- Is the least popular of the two choices presented for public consultation where a majority (51%) favoured a superior design combining brickwork and railings which will also result in a lower impact from litter, spray and surface run off on the river. Only 39% favoured the scheme now put forward. The Design and Access Statement is, at best, disingenuous in concluding that *"the popularity of the two designs was broadly comparable"* when there was a clear preference stated.

- Fails to address sharp criticism from Merton Council's Design Review Panel, including of a *"generic design"* and limited consideration of cyclists and impacts on adjacent green space, in arriving at its AMBER verdict.
- Will increase levels of visual, noise and vehicle pollution experienced in Ravensbury Park and by users of the Wandle Trail consequent on removing mature trees and demolishing the protective part 18<sup>th</sup> century brick wall (which is acknowledged as having a character and patina of interest by the Heritage Statement) running along the road. The Design Review Panel identifies that *"What is currently a peaceful and intimate space could potentially become considerably less so."* Any proposal involving removal of the wall should be accompanied by an assessment of the visual, noise and pollution impact on users of the green space and the Wandle Trail before a planning decision can be made.
- Is based on an unsuccessful compromise which loses 40 sq m of Metropolitan Open Land and protected Open Space from Ravensbury Park to highways use, removes a protective historic wall and fells a significant number of mature trees in order to improve provision for cyclists and then still makes inadequate provision for cyclists. The proposals include a painted arrow directing southbound cyclists to use the pavement when crossing the bridge despite such interventions having been wholly discredited and in conflict with both Local Transport Note 1/20 Cycle Infrastructure Design ("Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians. Where cycle routes cross pavements, a physically segregated track should always be provided. At crossings and junctions, cyclists should not share the space used by pedestrians but should be provided with a separate parallel route." Paragraph 1.6.1) and the adopted London Cycling Design Standards. Officers have defended the approach on the basis of the change in Government policy in Local Transport Note 1/20 being too recent but the London Cycling Design Standards have been in place since 2014. Other options are not considered and there is no evidence of discussion with the National Trust or others about land not in Merton Council's ownership to enable a more enduring solution which provides cycling infrastructure to the standard required and avoids the loss of open space and the trees and the historic brick wall protecting Ravensbury Park from noise and pollution.
- Persists in misnaming the bridge and thereby overtly diminishing its historic significance the crossing is known as Mitcham Bridge and this best reflects its historic role rather than a name derived from the more recent name of the road which crosses it. This name Mitcham Bridge should be promoted to all who use it. This includes ensuring that the name Mitcham Bridge is recognised within the fabric of the bridge itself. There is no case for re-writing history through a public competition to name the new bridge.
- Lacks evidence that the loss of 12 valued trees will be compensated by new planting of at least equivalent value.
- Fails to take advantage of the opportunity to promote the historic significance of the crossing through use of decorative railings and provision of appropriate space in an enhanced public realm adjacent to the historic ford to allow for interpretation. The retention of the historic parish boundary marker is welcome but how it will be incorporated into the new structure is unclear and should be specified in any planning consent.
- Fails to confirm use of the Wandle Valley Regional Park visual identity in all signage and interpretation.

• Is based on misleading supporting information, including an arboricultural survey that states "There are no TPO or Conservation Area designations affecting the site" and that "A search of Merton Council's website was made in May 2020, which showed no TPO or Conservation Area designations affecting the site. Therefore, no protected trees will be impacted." This is despite the site's location in the Wandle Valley Conservation Area. Given such a poor methodology and basic errors of fact we believe the proposals cannot be determined without more robust supporting information.

6. National planning policy is clear in stating that "*Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions*" (NPPF, paragraph 130). Our submission evidences these failures and the negative impacts. It also evidences the failure to provide cycling infrastructure to the required standard. The resulting planning application fails to meet the statutory requirement to "preserve or enhance" the Conservation Area and conflicts with the development plan, including policies CS5, CS14, DM D1, DM D2, DM D4 and DM T1. It should be refused.