

21 May 2021

**Future Merton
London Borough of Merton**



By email to future.merton@merton.gov.uk

Dear Sir / Madam,

**PlanWimbledon proposed Neighbourhood Area consultation
Representations on behalf of Clarion Housing Group.**

On behalf of Clarion Housing Group (Clarion) we write to make representations on the PlanWimbledon proposed Neighbourhood Area consultation.

Clarion is one of the London Borough of Merton's (LBM) preferred Registered Providers of affordable housing. It owns and manages around 10,000 homes in the Borough, including the High Path Estate in South Wimbledon where it is engaged in a major investment programme to provide additional good quality new homes.

Construction of Phase 1 to provide 134 new homes at High Path is nearing completion. Outline planning permission has been granted for the regeneration of the remainder of the Estate to deliver over 1,500 more homes alongside new employment and community spaces, and new open space. Reserved Matters approval for Phase 2 has also been secured. Policies addressing the regeneration of the Estate are contained within the Estates Local Plan (ELP) (2018) and we understand these policies will be saved as part of the new Local Plan.

It is understood that PlanWimbledon's strategy for defining the Neighbourhood Area was initially informed by setting a one mile radius around Wimbledon's former Town Hall. The boundary was then adjusted to reflect physical geography, people's perceptions of the extent of Wimbledon, and responses from various parties that had been engaged with.

Despite the approach taken it is clear that the proposed area is very large (about a third of the borough). To put this into context, the Planning Practice Guidance (PPG) states that "*electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents*".¹ In contrast, the Application by PlanWimbledon outlines that the proposed area spans 7 wards with an adult population of 40,000. Another consideration relevant when deciding the boundaries of neighbourhood areas can be the physical appearance or characteristics of the neighbourhood. The difficulty with the extensive area proposed is that it encompasses a very diverse range of townscapes. For instance, the area around the former Town Hall has a very different architecture and character from the High Path Estate and even, arguably, South Wimbledon. This will make it very challenging for any future Neighbourhood Plan to be focussed in its policy intent. In this regard, it is also noted that: the Councils 2021 Character Study which is proposed to be adopted as a SPD, identifies South Wimbledon as a district character area from the rest of the Wimbledon area (which itself is comprised of several neighbourhoods). The draft Local Plan also identifies South Wimbledon as a distinctive neighbourhood in its own right and confirms that local residents consider South Wimbledon as a neighbourhood with its own distinctive character.

The Application document by PlanWimbledon identifies four reasons why the Neighbourhood Forum should cover the area identified, these being to encourage community engagement, ensure appropriate growth, deliver a shared vision, and drive socio-economic change.

¹ Paragraph: 033 Reference ID: 41-033-20140306





Whilst these aspirations are well understood, the existing local and regional planning policy context does this already for the High Path Estate through policies contained within the New London Plan (adopted in March 2021), the Core Strategy and Site and Policies Plan, and the Estates Local Plan (ELP) (adopted 2018). The emerging Local Plan also includes a chapter on South Wimbledon which includes the High Path Estate.

All of these documents have been subject to extensive public consultation, have been informed by a robust evidence base and where adopted have undergone Examination in Public. Specifically, the ELP was developed with the specific intent of bringing forward the optimum regeneration development proposals for the Eastfields, Ravensbury and High Path Estates with several site-specific policies devoted to each neighbourhood. The evidence base and community engagement carried out in preparing the ELP was prepared at a local level. As a result it sets out a very clear vision of how the High Path Estate may be developed.

Bearing the above in mind we suggest that PlanWimbledon and the Council consider re-defining the boundaries of the Neighbourhood Area so that it excludes the High Path Estate.

We would be grateful for confirmation that this letter of representation has been received. Should you have any questions regarding its contents please do not hesitate to contact myself or Samruti Patel at these offices.

Yours faithfully,