

PLAN WIMBLEDON'S APPLICATION FOR A NEW NEIGHBOURHOOD PLAN

REPRESENTATIONS SUBMITTED ON BEHALF OF F&C COMMERCIAL PROPERTY HOLDINGS LIMITED IN RESPONSE TO ONLINE SURVEY (submitted via LBM's portal on 19/05/2021)

- 1.1 These representations do not object outright to Plan Wimbledon being a designated forum for proceeding with a neighbourhood plan for the wider area; however, the inclusion of Wimbledon town centre within the designated application is subject to objection.
- 1.2 F&C Commercial Property Holdings Limited (as advised by BMO Real Estate Partners, as asset managers and Stanhope Plc as development consultants) own Site Wi11 known as Victoria Crescent/Piazza, 39–59 The Broadway, 1–11 Victoria Crescent/Piazza, Wimbledon.

Do you support Plan Wimbledon's proposed neighbourhood boundary?

- 1.3 The extent of the proposed neighbourhood area is not reflective of a "neighbourhood" but instead it includes many different neighbourhoods of a very extensive catchment. It would be difficult to understand how the neighbourhood plan would encompass focused, concise and detailed policies in achieving the economic growth objectives for Wimbledon as a Major Centre whilst also trying to achieve other different regeneration objectives for residential sub-areas of the identified catchment.

Do you support Plan Wimbledon’s application to become a neighbourhood forum for that area?

- 1.4 The principal consideration is the fact that any future neighbourhood plan needs to properly comply with the “basic conditions” set out in Schedule 4B of the Town and Country Planning Act 1990, paragraph 8 (2).
- 1.5 The policies and guidance that are relevant include the following:
- 1.6 The NPPF follows the provision of section 38 (6) of the Planning and Compulsory Purchase Act 2004. The relevant NPPF paragraphs in this case relate to: paragraphs 12 and 13 (“*the planning system should be genuinely plan led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priority; and a platform for local people to shape their surroundings*”); paragraph 16d (“*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to the development proposals*”) and paragraph 16f (“*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area...*”).
- 1.7 The adopted Core Strategy 2011 establishes clear strategic policies for the regeneration and growth at Wimbledon and this priority remains within the new Merton Local Plan. The new local plan is advancing, having been subject to recent public consultation earlier this year (stage 2a consultation) and with an expected pre-submission plan anticipated for consultation during the coming months which will be examined and then formally adopted. The new local plan has been prepared to comply with strategic, new London Plan policies (as set out in the Mayor’s adopted London Plan 2021) which continues to identify

Wimbledon as a Major Centre and an important opportunity area for large-scale development with significant increases in jobs and homes. The vision, key priorities and objectives for Wimbledon are therefore clearly set out in both the recently adopted London Plan and the advanced, new Merton Local Plan.

- 1.8 In particular, draft Policy N3.6 contained within Chapter 9 of the new Merton Local Plan identifies the need for promoting Wimbledon as “*South west London’s premier location for business, leisure, living and culture*” in providing an “*example of good quality and sustainable place making*” whilst also identifying the need for “*driving investment and innovation in work spaces to support the local economy and jobs in the town centre commensurate with Wimbledon’s role as a Major Centre.*” It further states that the local plan will “*encourage development that attracts businesses, visitors and tourism to the area all year round, including high-quality hotels, conference facilities and cultural activities*” with the aim to strengthen the position of Wimbledon as a Major Centre in south London through the redevelopment of identified key sites. The Victoria Crescent site, known as Site Wi11 represents an important, strategic allocation for a mix of town centre uses through comprehensive redevelopment.
- 1.9 The new Merton Local Plan when adopted later this year alongside the new London Plan will form the up-to-date statutory planning policy framework for future decisions on applications across the town centre.
- 1.10 Further, there exists “Future Wimbledon Supplementary Planning Document” recently adopted in November 2020 which outlines all such priorities for Wimbledon town centre in relation to achieving: design quality, public realm, urban greening and sustainability, improving High Street vitality (post-Covid

recovery) whilst also considering long-term ambitions. These priorities are also embedded in draft planning policy to ensure consistency.

1.11 The adopted town centre SPD has been subject to design and technical evidence and whilst F&C and their advisors have made past representations on it during the consultation process (in relation to inclusion of site W111 within the tall buildings cluster given its significance amongst other considerations), it is acknowledged that the SPD will act as guidance to the new Local Plan. The SPD document therefore incorporates guidance on alternative land-use allocation and distribution and other such development parameters particularly in relation to allocated sites having considered some of the constraints and opportunities across the town centre as a whole. The SPD therefore provides the next level of detail in terms of how strategic, identified sites might come forward which has been subject to stakeholder consultation and engagement.

1.12 This planning policy framework is therefore considered more than adequate in providing the required policy and planning guidance in shaping the regeneration of the town centre and its strategic development sites. The introduction of a neighbourhood plan would result in unnecessary duplication of policy which would need to repeat policy objectives set out in the new local plan and adopted SPD (given it will need to be in compliance) – in turn, questioning at the outset its role and purpose. Such duplication would not meet the “basic conditions” for preparing a neighbourhood plan. Indeed, it would result in an additional layer of statutory plan policy which would create uncertainty in application decision-making given the planning policy framework which will be in place for that very purpose. Again, this would not meet the “basic conditions” tests.

1.13 More specifically, within Plan Wimbledon's application (updated April 2021) at paragraph 5.4.2, it is stated that the COVID-19 pandemic is increasing the uncertainty about the future direction of the economy particularly for High Street retailers, hospitality venues and offices as people adapt to different ways of shopping, working and socialising. There is certainly an element of repurposing town centres in adapting to new retail environments. However, the adopted SPD (and the new local plan) already recognise this and it is not considered that preparing a neighbourhood plan will create any further certainty; in fact, the opposite. Indeed, it is now (post-pandemic recovery) when absolute planning certainty is required through adopted policy and guidance in determining strategic development schemes in the short to medium term. Another layer of plan making will only add to planning uncertainty and potentially delay the decision making process for such schemes to the detriment of much needed, town centre regeneration to assist short term economic recovery.

Other Comments

1.14 The application contains very limited representation from business interests and reflects very much the ambitions of the neighbourhood plan to be resident led. This does not sit comfortably with the commercial objectives essential for bringing forward short, medium and long-term economic growth within Wimbledon as a Major Centre.

1.15 Should the application be approved, before proceeding with the neighbourhood plan, F&C and their advisors would want to be fully involved and engaged in the process in order to assist in providing a balanced representation of important business interests to ensure delivery of key regeneration sites.