

[Redacted]

From: R [Redacted] Robeson [Redacted]
Sent: 21 December 2018 17:33
To: Future Merton
Cc: G [Redacted] Tulley
Subject: Representations: Draft Merton Local Plan 2020 (Stage 2 Consultation Version) and Future Wimbledon Masterplan
Attachments: MertonLP2020rep (2).pdf; Future Wimbledon Masterplanrep211218.pdf

Sir/Madam,

On behalf of our clients, BMO Real Estate Partners, please find attached our representations to the following consultations:

- Draft Merton Local Plan 2020 (Stage 2 Consultation Version); and
- Future Wimbledon Masterplan.

On behalf of our clients, we ask that we be advised of future consultations regarding both documents as these progress.

Please confirm receipt and that these are in order.

Many thanks.

Kind regards,

R [Redacted] Robeson

R [Redacted] Robeson
Senior Planner

GL Hearn Limited
[Redacted]

[Redacted]

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Our ref: G/SC/GT/Future Wimbledon Masterplan

Future Merton Team
London Borough of Merton
Civic Centre
London Road
Morden
SM4 5DX

21 December 2018

Dear Sir/Madam

FUTURE WIMBLEDON MASTERPLAN
Consultation Draft October 2018

We write on behalf of our clients – BMO Real Estate Partners. BMO is the asset manager for F&C Commercial Property Holdings Ltd which owns the development scheme commonly known as Victoria Crescent/Piazza in Wimbledon town centre.

Victoria Crescent/Piazza is a mixed use retail and leisure scheme with a site area of approximately 1 ha. It is divided into two main buildings, laid out in a crescent shape with a piazza fronting the Broadway and with a pedestrian walkway running from the Broadway through to Hartfield Road.

Victoria Crescent/Piazza is one of the largest single ownership sites in the heart of Wimbledon town centre, has one of the largest retail/leisure offers in the town centre, comprises the piazza as one of the few large public open spaces in the town centre, and has excellent public transport accessibility with a PTAL rating of 6B.

In short, Victoria Crescent/Piazza is one of the most strategically important sites in Wimbledon town centre.

Victoria Crescent/Piazza adjoins the Hartfield Road surface car park (0.45 Ha) which is owned by LB Merton. Discussions have been held between BMO and LB Merton (in its role as landowner) to explore the potential for a complementary redevelopment of the two sites, optimising site layout, access, design and uses.

BMO welcomes the preparation of the Wimbledon Town Centre Masterplan and the goal of setting out an agreed vision for the town centre.

Our comments are as follows.

Section 1 - Purpose and status of the plan

We note the Masterplan has been prepared to be adopted as Supplementary Planning Document (SPD) to the adopted Development Plan. Merton's Core Strategy 2011 and Sites and Policies Plan 2014 are referenced and "other guidance" is set out at section 8. However, we consider it would be useful to refer in the text to the adopted London Plan, which contains relevant town centre policies (e.g. Policy 2.6, 2.7 and

2.15), that call for growth and a more flexible approach for mixed use development within London's town centres.

A statutory requirement for SPD is that a "*reasoned justification*" is set out for the proposals and content. The Masterplan contains consultation feedback and comments on key issues. However, the Masterplan would benefit from a section referencing the "baseline" studies and evidence base that it has drawn on to demonstrate the "*reasoned justification*" is robust and sound.

By way of an example there is no clear statement of the technical traffic, public transport and parking data/assumptions that underpin the Masterplan's development proposals in a pre and post Crossrail 2 world? Indeed at Page 72 the Masterplan appears to suggest that little analytical work has been carried out to date stating.... "*Detailed traffic modelling and options appraisals will need to be developed in future.*"

In addition the Masterplan should in general terms make clear its vision on future car parking provision in the town centre based on existing provision, occupancy levels, development potential and the town centre's excellent public transport accessibility

Section 4 - Future Wimbledon

We note that the Council is intending to work with the Greater London authority (GLA) to prepare an Opportunity Area Planning Framework (OAPF) for Wimbledon, reflecting Wimbledon's location within two growth corridors in the draft London Plan – namely Crossrail 2 and the Tram Growth corridor.

The draft London Plan sets out a target of 5000 new homes and 6000 new jobs for Wimbledon as part of the Crossrail 2 corridor. However, the Masterplan makes no comment on the GLA targets nor does it seek to quantify the scale of development envisaged in the Masterplan. We consider it important that the Masterplan indicates the likely scale of development in both a pre and post Crossrail 2 world.

Section 6 - The Masterplan

The proposed Spatial Strategy is set out at page 76 and seeks to" *promote economic development and growth initially in the St George's Road and Broadway East areas*".... with...." *In the longer term, over-station development, air-rights development above the rail tracks and re-use of any potential Crossrail 2 work sites*"

We consider this "book ended" approach to the town centre is now out of date, being we understand based on the Tall Buildings Study 2011. It does not reflect what has happened in the heart of the town centre (e.g. Pinnacle House and recent planning consents).

Moreover, it significantly underplays the role of the Broadway and Hartfield road sites have in delivering major new mixed use development which is not dependent on Crossrail 2 coming forward. The Spatial Strategy should therefore clearly recognise that as well as St George's and Broadway East, and area which might be called "Broadway Central" should be a key focus of early development.

Page 81 sets out the adopted Core Strategy Policy CS6 (a-h), where the objective for Wimbledon is to"*develop and maintain its position as a diverse Major Centre offering excellent shopping, business and cultural facilities*".

BMO as one of the UK's leading investment and asset managers of retail led mixed use schemes see first-hand the increasing need for more flexible planning policies to facilitate the more innovative and "experiential" forms of mixed use developments which are now needed in town centres.

In this regard, we would ask that this section cross references Policy SD6 of the draft London Plan (as noted on page 75 of the Masterplan), which in our view more clearly identifies the need for a more flexible policy response for town centre development, especially with regard to retail uses.

Page 88 address... *“public space framework traffic and transport”*and states that *...” Returning Hartfield Road to two way working will enable the Broadway to take on a more public transport oriented role and reduce general traffic on this important shopping street”*.

In principle we agree with this approach, but are unclear as to whether the Masterplan is advocating two way working of buses on the Broadway (outside Centre Court), and if so the impact of this on access to and use of the bus station on Sir Cyril Black way.

Page 92 deals with building heights. The Masterplan adopts a “mid-rise” policy focused on the St Georges Quarter and Broadway East “book ends”. In respect of the BMO Victoria Crescent/Piazza site four indicative building blocks are drawn with building a height guide of 8-9 storey heights.

As noted above we consider the BMO site, by virtue of its size, location, accessibility, and its ability to be developed long before Crossrail 2, to be one of the most strategically important in the town centre. It also offers the prospect of a wider catalytic regeneration with the Hartfield Road car park site. As such we consider the building height guide set out at page 93, should be at least 10 storeys for the Victoria Crescent /Piazza site.

Hartfield and Victoria – Neighbourhood 9

Subject to our comments above, and in respect of the BMO part of the wider Neighbourhood 9 area, we generally agree with the four bullet points set out on Page 119.

However, in the third bullet point we wish to delete the phrase *....including green walls on building façades....* as this is considered overly specific in a masterplan, and the last bullet point amended to read as below (*our bold italics*)

- *This area is suitable for commercial and leisure led intensification*
- *New buildings should open up frontages along Hartfield Road to reduce the existing severance and create small, intimate, human scale spaces*
- *High quality design, open space, urban greening (**including green walls on building façades**) and an inclusive public realm should be a core consideration*
- ***Any new*** *leisure, entertainment or cultural spaces should be accessible as part of a wider public realm approach to large sites*

Crossrail 2 Growth Opportunity

Page 128 demonstrates that the Masterplan’s long term vision is to a significant degree based on Crossrail 2 coming forward, allowing for over station/rail development, creating opportunities for major infrastructure provision to “free up” the town centre, and the use of released Crossrail 2 working sites. However, much of this is unlikely to come forward before the late 2030 and well into 2040’s.

We fully concur with the Masterplan’s purpose when it states (page 54) that the *...”Masterplan is not reliant on Crossrail 2”*.

As such we consider that whilst the long term Crossrail 2 related vision is important, it is equally if not more vital that the emerging Merton Local Plan 2020 and any OAPF should look to focus on and facilitate shorter to medium term development potential (and associated infrastructure needs), in order that Wimbledon does not fall behind its competitors. We would therefore wish to see greater recognition and emphasis in the Masterplan of the importance of sites such as Victoria Crescent/Piazza to Wimbledon's future, given they can come forward without the need for Crossrail 2.

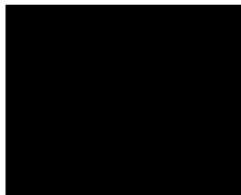
Section 9 – Next steps

We welcome this opportunity to comment further on the Masterplan. Given the extended consultation period we would clarification on two issues:

- What now is the proposed adoption date?
- Is it the intention that following this current consultation to adopt the Masterplan as amended as informal planning policy, or is it intended that another round of consultation will be undertaken as part of formal adoption as an SPD?

Our client BMO remains eager to engage in and help shape the future of Wimbledon. We therefore ask to be fully involved in any future public consultations or stakeholder meetings with landowners and developers in the town centre.

Yours faithfully,



GL Hearn

cc: BMO – J. [redacted] Wilkes