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From: [REDACTED] Chambers [REDACTED]
Sent: 06 January 2019 23:04
To: Future Merton
Subject: Future Wimbledon Masterplan- Comments on behalf of BARA
Attachments: FUTURE WIMBLEDON MASTERPLAN- BARA COMMENTS.pdf

Dear Paul,

Please find attached the comments and representation from the Battles Area Residents Association (BARA) regarding the draft Future Wimbledon Masterplan.

We trust you will find these comments helpful.

BARA looks forward to ongoing engagement with the Council in relation to proposals for Wimbledon Town Centre.

Many thanks

[REDACTED] Chambers

Committee Member, BARA

[REDACTED]

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FUTURE WIMBLEDON MASTERPLAN (OCTOBER 2018)

COMMENTS ON BEHALF OF BATTLES AREA RESIDENTS ASSOCIATION (BARA)

The Battles Area Residents Association (BARA) is a group that represents the community living in the Battles Estate in South Wimbledon and some surrounding streets including Quicks Road, Wycliffe Road, Latimer Road, Ridley Road, the east side of Merton Road, the north side of Merton High Street, the west side of Haydons Road to the Sainsbury's mini supermarket and including Haydons Road Recreation Ground. We currently have some 120 members in an area with approximately 700 homes.

BARA members have attended the workshops and sessions relating to the Future Wimbledon Masterplan and welcome the opportunity to comment on the Draft Document.

BARA shares the Council's aspirations to enhance Wimbledon Town Centre by creating new employment opportunities, improving the cultural and retail offer, greening the town centre and creating new public spaces. It is essential, however, that any new development is of the highest design quality and protects the character and heritage of the town centre. We want to see a vibrant town centre- a place where people will choose to live, work and spend their leisure time, building on existing strengths and assets including the strong sense of community in the area.

However, whilst we want to see positive change, we do not consider the Future Wimbledon Masterplan provides a sufficiently robust framework to guide future development. Whilst it sets out a vision, it does not provide us with confidence about the form, scale and quality of future development (particularly given the quality of much recent development) and we are very concerned about the potential impact on the character and heritage of the town centre and local communities. We are particularly concerned that it will lead to further piecemeal development in the short-medium term and make it more difficult to resist inappropriate development of key town centre sites.

The plan is mainly a description of the historical development of Wimbledon, the current situation and the outcome of last year's workshop. The first 75 pages of the document are devoted to this. It is unclear how the masterplan and development strategy has built on this. There is a lack detail and the Masterplan appears to represent the Council's aspirations for largescale development rather than robust proposals underpinned by any detailed financial or technical assessment. The one page section on Delivery is totally inadequate for a Masterplan document of this importance.

The document actually makes reference to the Masterplan as being 'indicative' and highlights the need for further detailed assessment and discussion with Network Rail and TfL. We would therefore question whether the Masterplan can be considered ready for adoption as a Supplementary Planning Document (SPD) given that by the Council's own admission, it is in a very early stage of development and delivery cannot be demonstrated.

We are firmly of the view that if the Council's intends to adopt the Masterplan as an SPD and to give it significant weight in the determination of planning applications, it needs to be

underpinned by more detailed assessment work (in particular, relating to transport and viability) and to include a detailed Delivery Strategy including timescales, funding and arrangements for partnership working.

If the document is to be adopted in advance of any more detailed assessment work, we believe it should be retitled 'Future Wimbledon Vision' as it is misleading to refer to it in its current form as a Masterplan.

Our more detailed comments are set out below:

1. The Masterplan (p83 and reproduced again on p129) is difficult to interpret and requires a key/ annotation to explain the proposals.
2. The Masterplan is totally dependent on Crossrail 2 and a final decision on when and indeed whether it proceeds, its final alignment and funding- none of which are known and unlikely to be confirmed before 2021 at the earliest. The Masterplan gives no consideration to alternative scenarios or to assess in any detail the implications of different alignments or a delay in Crossrail 2. What are the implications for the Masterplan if Crossrail 2 is delayed or indeed postponed/ cancelled? Will the Masterplan be subject to a full review?
3. There is no quantification of the level of development proposed and more importantly no viability assessment has been undertaken. The viability of building over the railway to the extent proposed has not been tested and there is no Network Rail agreement. We would question the viability of proposals- we do not believe building over the railway to this extent has been achieved anywhere in London with the possible exception of Victoria Station. We are also aware that proposals were put forward in the late 1980s for a smaller scale development over the railway (Centre Court Phase 2) which never materialised because of viability. The feasibility of high-rise development over the railway has also not been assessed and further detailed assessment work is required.
4. Without the potential to build over the railway, the scale of development which could be accommodated in the town centre would be significantly reduced. However, consideration does not appear to have been given to different growth scenarios if building over the railway proves unviable.
5. The Masterplan aspires to make Wimbledon a Metropolitan Centre. How much growth is required for Wimbledon to surpass Kingston and Croydon as the pre-eminent business centre in south London? Can three metropolitan centres be accommodated in such close proximity? How much does Wimbledon need to grow to be categorised as a Metropolitan Centre? These questions have not been addressed and it is unclear what assessment has been undertaken to support the reclassification of Wimbledon Town Centre in the London-wide hierarchy. We are aware that a joint study is currently being undertaken with the South London Partnership (Croydon, Kingston upon Thames, Merton, Richmond upon Thames and Sutton) - Visualising Good Growth in South London and this will have implications for the future of Wimbledon Town Centre in the

wider sub-regional context. How will the findings of this study feed into and inform the Future Wimbledon Masterplan?

6. The Masterplan boundary is random (and in places cuts through streets and neighbourhoods- in particular Neighbourhood 4 Dundonald Sidings). Reference is made to Neighbourhoods but these exclude the communities living in the residential streets in the town centre. It is unclear how the Neighbourhoods have been defined or the number of residents (current and future) who will be living within the boundary of the town centre.
7. It is unclear how the southern gateway to the town centre has been defined. We believe that in practice the real gateway to the town centre is South Wimbledon station- a key part of the public transport infrastructure serving the town centre and local neighbourhoods. The boundary should be reviewed in relation to the proposed South Wimbledon Local Centre.
8. The plan focuses on the very long term - 15 years + and little is said about the short to medium term which are of critical importance to local communities and to the future character and appearance of the town centre. The Masterplan should include a detailed implementation strategy covering the short, medium and long term but the document contains scant details about the timescale for implementation and the actions needed to secure delivery. How is growth and change to be managed in the short/ medium term- this is of vital importance given current pressures for development and the concerns of local residents about the quality of recent/ current development proposals and their impact on the character of Wimbledon. Without a robust plan in place, development will continue to be piecemeal and clearer guidelines are required to ensure development is of a high quality and an appropriate form, scale and mix. There is a danger that the current focus on the very long term will blight the town centre in the short to medium term. Section 7 (Delivery) provides very little detail and is very generic. This Section needs to be further developed in order to provide a clear delivery strategy and timescale with an Action Plan and phasing proposals over the short, medium and long term. This should include the key short term initiatives which are required to take forward the proposals in the Masterplan eg: Detailed Transport Assessment, Public Realm and Open Space Strategy and Design Codes for key sites.
9. Reference is made to the Wimbledon Opportunity Area as identified in the Draft London Plan. It should be recognised that this comprises Wimbledon, South Wimbledon and Colliers Wood and the town centre needs to be viewed in this wider context.
10. The Masterplan talks about the character of Wimbledon and the need for a modern interpretation of its DNA- the precedent images are well selected and point to this but the illustration on p98 does not reflect this. Concerns raised by local communities at the consultation events relating to the design, scale, height and quality of new development have not been addressed.

11. There is no credible transport strategy to support the Masterplan proposals for dealing with traffic (and additional traffic associated with major new development) and public transport. It does not appear that any detailed transport analysis has been undertaken and this is one of the first requirements in taking the Masterplan forward. The transport section (p88-89) lacks detail and there is no explanation of the proposals set out in the plan presented on p89. In particular the proposals for making Wimbledon more pedestrian friendly and reducing traffic conflicts require further amplification.
12. There is a lack of detail about proposed land uses and no market assessment to underpin this- how many residential units, how much new office floorspace is proposed and what are the new cultural facilities and where are these to be provided? The traditional role of town centres is changing as evidenced by recent retail trends and High St closures. The Masterplan should be rethinking the future role of the town centre in the light of these market trends. Further analysis is required.
13. We are very concerned that the Masterplan does not identify key development sites or provide any detailed development/ design guidance for developers. The Masterplan provides the opportunity to set detailed design guidelines but instead provides very broad, generic advice at a neighbourhood scale. We are particularly concerned about the absence of any clear development and design advice for key sites which are likely to come forward in the short-medium term notably the YMCA and adjoining properties and the Morrisons Car Park. We are concerned that without clear guidance, development proposals will be treated in a very ad hoc and piecemeal way and will have a detrimental impact on the character of the town centre.
14. New Building Heights Guidance is set out in the plan provided on p93 but there is no explanation or rationale for the proposed changes to the current guidance and the proposals for tall buildings within the town centre. Has a Tall Buildings Study been undertaken? We are very concerned about the impact of tall buildings on the character and heritage of the town centre.
15. The section on Broadway East (p124) highlights the mid-rise context but this is at odds with the Building Heights Guidance on p93 which makes provision for a cluster of taller buildings around the YMCA. The text on p125 provides limited guidance for new development. There is no clear rationale for a cluster of tall buildings around the YMCA site (up to 14 storeys in height) which are significantly taller than any other buildings in this part of the town centre? The Masterplan should provide clear guidelines for this key area to ensure a high quality of development appropriate to its local context.
16. Our concerns about continued piecemeal development are heightened by the reference to 'incremental improvements' on p131. Any incremental improvements must form part of the longer term vision for the town centre.