

COMMENTS ON STAGE 2a DRAFT LOCAL PLAN

(in particular Sites Wi2, Wi4, Wi5, Wi6, Wi9, Wi10, Wi11, Wi13, Wi14, Wi15 and Wi16)

Overall, the draft plan has many laudable aspirations. However, my main issue with it is not the words or aspirations. It is the actions that the Council takes in reality.

The following comments relate to the Local Plan for building heights in Wimbledon Town Centre.

The draft Wimbledon Masterplan had a stated goal of creating 8,000 jobs in Wimbledon town centre. The Stage 2a draft local plan has now aligned itself with the London Plan which has a target of creating 6,000 jobs across Wimbledon, South Wimbledon and Colliers Wood combined. This significant reduction in the jobs target must reduce the need for tall commercial buildings in Wimbledon town centre.

On page 14 of this draft local plan, paragraph 3.6.14 states that the Opportunity Area target for jobs is largely predicated on Crossrail 2 implementation particularly development over the railway tracks. Crossrail 2 has been acknowledged as being beyond the timeframe of the plan.

Logically, from reading the above two paragraphs, there are very good reasons for the draft SPD to lower considerably the guidance on heights of the taller buildings around the town centre, including all the sites listed above. This is what residents have been asking for. However, the draft SPD has not done so.

This is the heart of the issue I have with the draft plan and the draft SPD. The Council, despite its words in the draft local plan (e.g. accept **modest** increase in building heights), is determined to impose significantly taller buildings on Wimbledon Town Centre (as shown by the guidance diagram in the draft SPD), even to the extent of ignoring its own planning policies. Looking at some examples of the track record to date:

- 27-29 Hartfield Road (Wi4 – 18/P4447) and 12 Hartfield Road (19/P0825). Neither of these applications complied with Council planning policies with regard to tall buildings and will result in significantly taller buildings, way beyond “modest” height increases. Both were approved by the Council. I believe this was done to create a cluster of very tall buildings which will be used to approve more of the same.
- 1-4 Francis Grove (19/P3814). This application did not comply with Council planning policies with regard to tall buildings and will result in a significantly taller building (10 storeys), way beyond a “modest” height increase. It was approved by the Council even though it more than doubled the height of the existing building and is significantly taller than anything around it. I believe this was done to start a cluster of tall buildings. This cluster will include Wi9 (“surrounded by 4-5 storey buildings” per the draft local plan), Wi10 (4 storey buildings to the north and west), Wi13 (currently Sainsburys), and Wi14.

This makes a mockery of the wording in the draft local plan and the consultation process. The actions of the Council do not match the wording in the draft local plan (modest increases in height). The residents have made very valid objections, including how the Council have contravened their own policies on tall buildings in actual planning applications, but they have been ignored.

As part of this submission, I have added below two documents previously submitted to you which give more detailed evidence supporting my issue. The second document regarding the Future Wimbledon SPD also addresses my concerns about the future of Centre Court.

PLANNING APPLICATION 19/P3814

ADDITIONAL INFORMATION FOR PAC 18/6/20

The application proposes to more than double the height of the existing buildings and the new building would be significantly taller than nearly all the buildings around it. The approval of this application would ride roughshod over the views of the vast majority of local residents. These views are not ‘nimbyism’ but very valid points which clearly demonstrate why this application should be rejected, and have also been expressed by the various bodies and associations which represent Wimbledon residents. The Council are the servants of the electorate; the electorate being the residents not businesses.

The specific policies and guidance being ignored have been detailed in various objections previously raised, amongst them:

- Core strategy 2011-2026 Strategic Objective 4(a). It is obvious from the objections you received that the local residents do not find this plan attractive.
- Core strategy 2011-2026 Wimbledon Sub Area Policy 6 paragraph 16.14. An increase of more than double the height of the current building does not follow that.
- Core strategy 2011-2026 Centres Policy 7 Summary of Town Centre aims Table 17.2 Design. This proposal is clearly not compatible with existing setting and wider context.
- Core strategy 2011-2026 Design Policy 14. Local residents are significant stakeholders in the town centre’s sense of identity and the vast majority reject this application. The residents are the only stakeholders who live in the town. In addition, this application is not consistent with tall buildings guidance.
- Tall Buildings Background Paper July 2010, 4.2 Wimbledon Town Centre Urban Design Analysis:
 - a. Paragraph 4.2.9. The comment about this historic area being generally unsuitable for tall buildings so obviously applies to this application.
 - b. Paragraph 4.2.20. This application is neither infill nor complementary to the predominant height of existing buildings.
 - c. Paragraph 4.2.23. This application clearly does not comply with this.
 - d. Tall building Opportunities, paragraph 4.2.27. This application clearly does not comply with this.

From all the above policies and guidance, it is completely inappropriate to more than double the height of the existing buildings. The overriding “cluster” is significantly lower.

Allowing this application, which ignores your current planning policies and tall buildings guidance, would clearly assist in achieving the Council’s objective of creating a tall building cluster. This is something that the local residents have made clear they do not want. It would add further evidence to the claim that the Council tactic appears to be to completely ignore current planning policies and guidance until they have achieved a cluster of tall buildings, at which point they will then claim they are complying with planning policies and guidance for later application approvals.

In summary, the Council must apply current policies and guidance in processing planning applications. Even the draft SPD states that is what the Council propose to do. This application ignores the Council’s own strategic objective, disregards its current policies and does not follow its guidance. In light of this alone this application should not be approved.

FUTURE WIMBLEDON SPD
CONSULTATION DRAFT JANUARY 2020
SUBMISSION BY E-MAIL (12/02/20)

I'll start by repeating the opening lines of my submission in respect of the draft Masterplan (Survey Monkey submission 17/12/2018) because they apply equally to this SPD: "Overall, there has clearly been a lot of thought and care taken in producing this draft Masterplan and it contains many admirable features. However, it lets itself down badly by its approach to the heights of buildings".

I am pleased that the Council has dropped its goal for Wimbledon to become a Metropolitan centre (para 4.5.23 in the SPD) and I presume Policy N3.6f (moving Wimbledon towards Metropolitan centre status) will now be removed from the Local Plan. However, the SPD has completely ignored the significant number of very valid objections to the building height guidance set out in the draft Masterplan. The building height guidance in this SPD is almost identical to what was in that Masterplan even though you are no longer aiming for Metropolitan centre status. That makes a mockery of the consultation process.

As you have chosen to ignore those objections I make no apology for repeating a number of points I have made previously as they are still perfectly valid.

The comments that follow need to be taken as feedback on the draft Merton Local Plan 2020, where applicable, as well as the SPD; in particular, in relation to the planning sites listed in the current draft Local Plan. To be clear, none of those sites should be redeveloped to more than 7-8 storeys high.

Paragraph 3.6.7 of the draft Local Plan states that "the local topography and quality townscape mean that Wimbledon is not suitable for high rise towers therefore to accommodate growth in keeping with the area, sites within Wimbledon town centre need to become denser and accept a moderate increase in heights". The terminology used for building heights (e.g. mid-rise, high rise) is slightly irrelevant. The reality is that anything over 7-8 storeys high will tower over the vast majority of the existing landscape.

The SPD as it currently stands will drastically alter the skyline for residents, not only those in close proximity but also those further afield. This goes against the planning policies and objectives and is not consistent with the Council's assertion in the draft Local Plan that residents will need to accept a moderate increase in heights. The proposed building heights, particularly around St George's Road, Francis Grove, Worple Road and Hartfield Road, are significantly higher than currently. These will tower over everything around them and are unacceptable. The same point applies to all the developments highlighted for the area above and around the station, particularly in light of Crossrail 2.

If the Council's justification is that these additional storeys are needed to meet the level of economic activity required to sustain the desired shops, bars, restaurants etc then where is the evidence?

The draft Masterplan was based on increasing the number of jobs in the town centre by 8,000. As you have not amended the building height guidance in the SPD I presume this is still your target. In the draft London Plan, the Mayor of London identified Wimbledon as an Opportunity Area with an indicative growth in the number of homes of 5,000 and jobs of 6,000; but this is not just for Wimbledon town centre, it also includes South Wimbledon and Colliers Wood. So where does the 8,000 come from? Also, given that you have dropped your goal of Wimbledon becoming a Metropolitan centre why is this number not being reduced with a commensurate reduction in building height guidance?

Local residents accept that a certain level of economic activity is required to maintain a thriving town centre, but would not accept growth for growth's sake. Justification is required.

I also reject your assertion in paragraph 6.2.59 on page 60 of the draft SPD that the building height guidance in Figure 56 is consistent, and in accordance with Merton's tall buildings policy for Wimbledon (CS6), which advocates a mid-rise level of growth for Wimbledon. Your building height guidance in the charts in this SPD even contradicts paragraph 6.2.53 which states "Taller buildings should contribute to creating a consistent scale of development based on a range of similar but not uniform building heights

that are determined by reference to the surrounding building heights and townscape characteristics.” In particular, the proposed building heights guidance around St George’s Road, Francis Grove, Worple Road and Hartfield Road, is significantly higher than the current properties.

To illustrate my point, I refer to planning applications in Hartfield Road (19/P0825) and Francis Grove (19/P3814) which you are currently processing. The proposed heights for these buildings are consistent with the guidance in this SPD. However, please refer to Appendices 1 and 2 which are copies of the objections I have raised to these applications. You will see in both cases that the applications do not comply with your planning policies or guidance on tall buildings. The points I have made would apply equally to any other application in these areas where the proposed height is as set out in your guidance in this SPD. I therefore do not accept your assertion in paragraph 6.2.59.

In the context of building heights I would also highlight paragraph 4.5.13 in this SPD which states that each application will be judged on its individual merits in accordance with local planning policy. This has not happened for 18/P4447 (hotel in Hartfield Road) as the appendices to this submission make clear.

With regard to the proposals for the YMCA I was very pleased to see the revised plans with the proposed height being reduced from 15 storeys to 9. However, I was very troubled by a comment made to me when I attended the consultation event at the YMCA to publicise the revised plans. I asked how they had managed to make the reduction in height and keep the plans viable. I was told that they would have actually put forward the revised plan in the first place had the Council not told them that they could go up to 15 floors. This seems to undermine paragraph 7.1.10 on page 85 where you state “Factors that influence a successful development coming forward include:

- The financial viability of a scheme. If it isn’t financially worthwhile to invest in a site then development won’t happen.
- Clarity at the planning stage. Uncertainty or mixed messages as to what might be acceptable and what wouldn’t will result in a compromised development that no-one is really happy with.
- Business and local support. Once the development, whether shop, office, cultural venue or home, is built then it will be the users of that building that will have the greatest influence in its long-term success or otherwise.

The YMCA comment, the complete disregard for the many valid objections to your building height guidance, and your complete disregard for your own planning policies (the approval of the hotel in Hartfield Road 18/P4447 being an example) just increase my scepticism as to how genuine this whole consultation process is in respect of building heights.

I believe the building height guidance in this SPD should be redrawn based on the Mayor’s indicative growth in jobs for Wimbledon, South Wimbledon and Colliers Wood. This would reduce the growth number for jobs in Wimbledon Town Centre by approximately 50% (i.e. to no more than 4,000, assuming the other 2,000 are absorbed by Colliers Wood and South Wimbledon) compared with the current draft. This may well result in none of the buildings needing to be higher than 7-8 storeys.

In the absence of any reasonable justification for either the 8,000 increase or if redrawing the guidance based on the Mayor’s Opportunity Area numbers is not an option, a formula-based approach to building heights should be adopted for planning guidance. It should be couched in terms of the lesser of a % increase in height of the current building and a cap, and it should apply to buildings which are shown in the plan as intended to be more than 4 storeys high. For example, using a 50% increase in the number of storeys (rounded up) with a cap of 8 storeys, then:

1. Any building on the draft SPD plan proposed to be up to 4 storeys high stays as it is.
2. Any **current** 3 storey building, other than those included in 1 above, could become 5 storeys, current 4 storey buildings could become 6, and 5/6/7 current storey buildings could become 8.

All of the above are counting from ground level. This could result in a significant increase in the number of 7-8 storey buildings but takes on board the need to accept a moderate increase in height. It also complies with current planning policies and tall building guidance.

Finally, whilst I accept some of the benefits that Crossrail 2 could bring, I am still very concerned about the impact on the town centre during the construction period. I believe it will kill Centre Court, may well make using the station very unattractive (building site dirt, increased overcrowding due to reduced space during construction work etc) and have a significant adverse impact on the immediate vicinity (noise, dirt and air pollution) as well as the local neighbourhoods (Alexandra Road, Queens Road and Ashcombe Road in particular) due to construction traffic and sites.

Crossrail 2 have estimated that this could last 10 years based on the experience of Crossrail, and that estimate was made before the significant delays now being experienced in delivering Crossrail. Given the track record of managing and delivering major travel infrastructure projects I think it is probably safe to add a few years. How does that make Wimbledon town centre attractive to anyone during that time? This could completely de-rail the Merton plan for Wimbledon.

Appendix 1: Planning Application 19/P0825

Dear Sir/madam,

I'm writing to register my objection to this application, particularly on the grounds of its proposed height.

In your core strategy 2011-2026 Strategic Objective 4(a) is to make Merton more prosperous with strong and diverse long term economic growth by ensuring that Merton's town centres (including Wimbledon) are attractive and accessible to local residents. It is obvious from the objections you received to 18/P4447 and now to this one that the local residents do not find either of these plans attractive. Why did you ignore your own strategic objective for 18/P4447? This should not be repeated for this application.

In your core strategy 2011-2026 Wimbledon Sub Area Policy 6 paragraph 16.14 states that "Wimbledon town centre includes clusters of existing buildings which are substantially taller than the surrounding residential area. New tall buildings should contribute to these clusters to create a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to extant building heights and townscape characteristics." Until the arrival of the Pinnacle building there were no tall buildings in Hartfield Road; it is not referred to anywhere as being relevant to tall buildings policy. The Pinnacle building alone does not constitute a cluster. The other buildings along that stretch are no more than 4 storeys high and are a proper cluster. Therefore, you should be following your stated policy and creating a consistent scale of development based on a range of similar but not uniform building heights. An increase from 4 to 9 storeys does not follow that. Why did you countermand this policy for 18/P4447? This should not happen for this application

In your core strategy 2011-2026 Centres Policy 7 Summary of Town Centre aims Table 17.2 Design, it states for Wimbledon town centre "Consider tall buildings where they are compatible with existing setting and wider context." This proposal is clearly not compatible with existing setting and wider context. Neither is 18/P4447. On this basis, why did you approve 18/P4447 and why are you even considering approving this proposal?

In your core strategy 2011-2026 Design Policy 14 states "All development needs to be designed in order to respect, reinforce and enhance the local character of the area in which it is located and to

contribute to Merton's sense of place and identity". Local residents are significant stakeholders in the town centre's sense of identity. You have ignored them in approving 18/P4447. Why? You should not ignore them again.

This policy states it will achieve its aims by "Protecting the valued and distinctive suburban character of the borough by resisting the development of tall buildings where they will have a detrimental impact on this character. Tall buildings may therefore only be appropriate in the town centres of Colliers Wood, Morden and Wimbledon, where consistent with the tall buildings guidance in the justification supporting sub-area policies, where of exceptional design and architectural quality, where they do not cause harm to the townscape and significance of heritage assets and the wider historic environment, and where they will bring benefits towards regeneration and the public realm. Even with the identified centres, some areas are sensitive to tall buildings." The last sentence is particularly relevant. Neither this application nor 18/P4447 are consistent with tall buildings guidance (see 5 below). You ignored your tall buildings guidance for 18/P4447. Why? It should not be ignored for this application.

In your Tall Buildings Background Paper July 2010, 4.2 Wimbledon Town Centre Urban Design Analysis:

Paragraph 4.2.9 states "The consistent height, scale and upper level architectural detail to these buildings make this historic area generally unsuitable for tall buildings which by their definition will change the skyline and appear significantly different than their surroundings in terms of height." This comment so obviously applies to these Hartfield Road proposals. Why did you ignore this for 18/P4447? This should not be ignored for this application.

Paragraph 4.2.20 states "There are several infill development opportunities within the centre and it is considered that there is potential to accommodate tall buildings complementary to the predominant height of existing buildings, given the existing precedence and the importance of Wimbledon as a major centre within the borough." This application and 18/P4447 are neither infill nor are they complementary to the predominant height of existing buildings. Why did you ignore this for 18/P4447? This should not be ignored for this application.

Paragraph 4.2.23 states "The linear structure of the centre with surrounding high quality residential areas limits the acceptable height of town centre development. It is anticipated that any future tall building development in the centre would be relatively consistent with the height and scale of current buildings. Tall buildings should be considered only where they complement the existing scale and character of the centre and its historic surroundings. New development proposals for tall buildings should be managed to ensure that the height, scale and massing is appropriate having regard to the surrounding sensitive residential areas, ensuring that a transition is achieved between the major centre and low rise development." This proposal clearly does not comply with this and neither did 18/P4447. Again, this was ignored by you for 18/P4447. Why? It should not be ignored again.

Under Tall building Opportunities, paragraph 4.2.27 states "In Wimbledon Town Centre, tall buildings should contribute to creating a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to surrounding building heights and townscape characteristics." This proposal clearly does not comply with this and neither did 18/P4447. Yet again, this was ignored by you for 18/P4447. Why? It should not be ignored again.

In all the above examples, it is completely inappropriate to use the height of the Pinnacle building to justify increasing building heights from 4 to 9 storeys. The overriding "cluster" is 4 storeys high. You appear to be trying to create a 9 storey cluster which countermands your current planning policies and ignores your current tall buildings guidance, but would seem to comply with your current draft Masterplan (see below).

Masterplan. I spoke to the case officer to find out what account is being taken of the draft Masterplan and related feedback thereon in current planning application reviews. He told me that this could not

be taken in to account because it was not yet a finalised document and that they had to go by current policies and guidance. I told him that there was a clear message in the feedback they were receiving on building heights from that consultation process, and it should not be ignored otherwise it would make a mockery of the whole consultation process. He did, however, undertake to raise the matter with his manager and the Design department. I have twice requested feedback on those conversations but have yet to have the courtesy of a reply.

Notwithstanding this, as can be seen from all the examples I have given above, the Council seem to have countermanded a number of the current policies and ignored its own guidance in processing 18/P4447, and applied a building height consistent with what is in the draft Masterplan. At the very least the public deserve an explanation.

In summary, per the Case Officer, the Council must apply current policies and guidance in processing planning applications. I have listed above eight examples of the Council ignoring its own strategic objective, countermanding its current policies and not following its guidance in processing 18/P4447. If that strategic objective is not ignored and these policies and guidance are properly adhered to, 19/P0825 should not be approved and the ruling on 18/P4447 should be overturned.

In addition, per the Case Officer, the draft Masterplan and clear feedback thereon from the consultation process cannot be taken in to account in processing current planning applications. Why then does approval appear to be being given to applications which mirror what is in the draft Masterplan? Notwithstanding this, common sense should prevail and the planning process should take in to account the draft Masterplan and related consultation feedback where there is a clear theme; in this case many objections to significant increases in building heights. An alternative could be to freeze planning applications until the Masterplan comes in to force. Otherwise the Masterplan could be overtaken by events and the whole consultation process will have been a sham.

Appendix 2: Planning Application 19/P3814

Dear Sir/madam,

I'm writing to register my objection to this application, particularly on the grounds of its proposed height. The application proposes to more than double the height of the existing buildings and the new building would be significantly taller than anything around it.

1. In your core strategy 2011-2026 Strategic Objective 4(a) is to make Merton more prosperous with strong and diverse long term economic growth by ensuring that Merton's town centres (including Wimbledon) are attractive and accessible to local residents. It is obvious from the objections you received to 18/P4447 and 19/P0825 that the local residents do not find either of these plans attractive. You ignored your own strategic objective for 18/P4447. This objective should not be ignored for this application or 19/P0825.
2. In your core strategy 2011-2026 Wimbledon Sub Area Policy 6 paragraph 16.14 states that "Wimbledon town centre includes clusters of existing buildings which are substantially taller than the surrounding residential area. New tall buildings should contribute to these clusters to create a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to extant building heights and townscape characteristics." There are no buildings in Francis Grove which are anything like the height being proposed in this application; it is not referred to anywhere as being relevant to tall buildings policy. Therefore, you should be following your stated policy and creating a consistent scale of development based on a range of similar but not uniform building heights. An increase of more than double does not follow that. This should not happen for this application or 19/P0825.
3. In your core strategy 2011-2026 Centres Policy 7 Summary of Town Centre aims Table 17.2 Design, it states for Wimbledon town centre "Consider tall buildings where they are compatible with existing

setting and wider context.” This proposal is clearly not compatible with existing setting and wider context. Why are you even considering approving this proposal?

4. In your core strategy 2011-2026 Design Policy 14 states “All development needs to be designed in order to respect, reinforce and enhance the local character of the area in which it is located and to contribute to Merton’s sense of place and identity”. Local residents are significant stakeholders in the town centre’s sense of identity. You have ignored them in approving 18/P4447. You should not ignore them for this proposal or 19/P0825.

This policy states it will achieve its aims by “Protecting the valued and distinctive suburban character of the borough by resisting the development of tall buildings where they will have a detrimental impact on this character. Tall buildings may therefore only be appropriate in the town centres of Colliers Wood, Morden and Wimbledon, where consistent with the tall buildings guidance in the justification supporting sub-area policies, where of exceptional design and architectural quality, where they do not cause harm to the townscape and significance of heritage assets and the wider historic environment, and where they will bring benefits towards regeneration and the public realm. Even with the identified centres, some areas are sensitive to tall buildings.” The last sentence is particularly relevant. Neither this application nor 19/P0825 are consistent with tall buildings guidance (see 5 below). You ignored your tall buildings guidance for 18/P4447. Why? It should not be ignored for this application or 19/P0825.

5. In your Tall Buildings Background Paper July 2010, 4.2 Wimbledon Town Centre Urban Design Analysis:

- a. Paragraph 4.2.9 states “The consistent height, scale and upper level architectural detail to these buildings make this historic area generally unsuitable for tall buildings which by their definition will change the skyline and appear significantly different than their surroundings in terms of height.” This comment so obviously applies to this proposal. Why did you ignore this for 18/P4447? This should not be ignored for this application nor 19/P0825.
- b. Paragraph 4.2.20 states “There are several infill development opportunities within the centre and it is considered that there is potential to accommodate tall buildings complementary to the predominant height of existing buildings, given the existing precedence and the importance of Wimbledon as a major centre within the borough.” This application is neither infill nor complementary to the predominant height of existing buildings. Why did you ignore this for 18/P4447? This should not be ignored for this application or 19/P0825.
- c. Paragraph 4.2.23 states “The linear structure of the centre with surrounding high quality residential areas limits the acceptable height of town centre development. It is anticipated that any future tall building development in the centre would be relatively consistent with the height and scale of current buildings. Tall buildings should be considered only where they complement the existing scale and character of the centre and its historic surroundings. New development proposals for tall buildings should be managed to ensure that the height, scale and massing is appropriate having regard to the surrounding sensitive residential areas, ensuring that a transition is achieved between the major centre and low rise development.” This proposal clearly does not comply with this. Again, this was ignored by you for 18/P4447. Why? It should not be ignored again.
- d. Under Tall building Opportunities, paragraph 4.2.27 states “In Wimbledon Town Centre, tall buildings should contribute to creating a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to surrounding building heights and townscape characteristics.” This proposal clearly does not comply with this. Yet again, this was ignored by you for 18/P4447. Why? It should not be ignored again.

In all the above examples, it is completely inappropriate to more than double the height of the existing buildings. The overriding “cluster” is significantly lower. Allowing this application, which countermands your current planning policies and ignores your current tall buildings

guidance but would seem to comply with your current draft Masterplan (see below), could pave the way for the creation of a 12 storey cluster. This is something that the local residents have made clear they do not want.

6. Masterplan. I have been told that this could not be taken in to account because it is not yet a finalised document and that the planning department had to go by current policies and guidance. However, there is a clear message on building heights (i.e. no more than modest increases) in the feedback the Council have received on building heights from the Masterplan consultation process, and it should not be ignored otherwise it would make a mockery of the whole consultation process.

Notwithstanding this, as can be seen from all the examples I have given above, the Council seem to have countermanded a number of the current policies and ignored its own guidance in processing 18/P4447, and applied a building height consistent with what is in the draft Masterplan. At the very least the public deserve an explanation.

In summary, the Council must apply current policies and guidance in processing planning applications. I have listed above eight examples of the Council ignoring its own strategic objective, disregarding its current policies and not following its guidance in processing 18/P4447. If that strategic objective is not ignored and these policies and guidance are properly adhered to, this application should not be approved, neither should 19/P0825 and the ruling on 18/P4447 should be overturned.

In addition, the draft Masterplan and clear feedback thereon from the consultation process cannot be taken in to account in processing current planning applications. Notwithstanding this, common sense should prevail and the planning process should take in to account the draft Masterplan and related consultation feedback where there is a clear theme; in this case many objections to significant increases in building heights. An alternative could be to freeze planning applications until the Masterplan comes in to force. Otherwise the Masterplan could be overtaken by events and the whole consultation process will have been a sham.