



Contribution from Friends of Wimbledon Town Centre to Merton Council Stage 2a Draft Local Plan Consultation

28th January 2021

Introduction: In this document, we respond to Merton Council's consultation on its draft local plan. Where it is possible, we link our responses to the questions in the online questionnaire, under appropriate sub-headings. Elsewhere we have included freestanding paragraphs under our own sub-headings.

We welcome the draft plan, which contains many policies that have the potential to raise the standard of development in Wimbledon town centre and more widely. Our comments relate partly to the plan's overall emphasis; partly to the details of the policies; and partly to the process of ensuring that the plan is effective.

Questionnaire Section 3 Urban Development Objectives and Good Growth Strategy

Question 1: Do you agree with the vision and objectives?

More needs to be done on this policy. **The plan priorities should not be about 'Growth'**, rather, the most important issue to drive policy-making is **Climate Change**. This should be expressed as the first priority. The policies should be re-ordered to put (1) Tackling Climate Change first, then (2) Open Space and Heritage, then (3) Walking, and then (4) **ADD** neighbour protection, then pollution, inequalities, then housing and then any remaining policies.

Question 2

The priorities are wrong: First should be C = Climate Change; 'growth' has negative connotations and should be replaced by 'change'. Included in the Plan and policies should be **clear, measurable and rigorous targets**, so that we can monitor progress and shortfalls can be addressed or lead to penalties, or whatever outcome is appropriate to safeguard the priorities.

We do not agree with the development of large new office blocks in Wimbledon Town Centre

Questionnaire Section 4 Neighbourhoods

Wimbledon: Policy N3.6

Under this sub-heading, we wish to make some specific points about masterplans, the pandemic, and neighbourhood planning, in addition to those that follow them:

Masterplans for major sites

Merton should create a policy whereby masterplans should be prepared (with public consultation), and perhaps funded by a landowner or developer, for each major site at the appropriate time. The masterplan would be required to gain approval before any planning application is submitted for the site in question. There should be a 'masterplan protocol' setting out that the masterplan will be prepared by the applicant in association with the council and that it will include consultation.

Pandemic and post-pandemic planning

Given the changes we have experienced since the start of the Covid-19 pandemic, we submit that now is time to review and challenge the assumptions in the Future Wimbledon SPD, and particularly those that relate to the commercial development of Wimbledon town centre. For example, we submit that with the increase in home working there is less need for the scale of employment floorspace (and associated height of buildings) proposed in the SPD.

Merton needs to think about the implications of the pandemic and to plan for the post-pandemic city, supporting active travel and the concept of the 10-minute town / 15-minute city / 20-minute neighbourhood. It should also plan for a future in which we may still face the present pandemic, or other pandemics. But Merton faces the challenge of government policy expressed in statutory instruments and new planning law. We urge Merton Council to think about and generate more opportunities for locally-responsive placemaking rather than solely being driven by the need to accommodate housing numbers.

Neighbourhood planning

The plan should clearly acknowledge the potential importance of neighbourhood planning. A neighbourhood plan that has been passed by an examiner and ratified by the community becomes part of the 'total multi-layered development plan'. It sits side by side with the local plan. The neighbourhood plan has to conform to the local plan, but it can influence how development is undertaken within the designated area. The neighbourhood plan sets out policies that help to shape, design and guide development to meet a shared vision. It complements the local plan by providing additional detail. This might be, for example, on the quality of development expected for the area and a distinct neighbourhood approach to a strategy set out in the local plan, but without undermining it. The neighbourhood plan and the local plan each have a role to play and go hand in hand.

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The Merton Local Plan should explain what practical action the council will take to support neighbourhood planning in the borough. The council should clearly acknowledge the neighbourhood planning process and commit to supporting groups working on neighbourhood plans, recognising that they are an important part of the overall development plan (and indeed, more so than any SPD, as a neighbourhood plan carries more weight).

The council should clearly set out which policies are strategic (and thus which any neighbourhood plan will need to demonstrate conformity with) and thus those which a neighbourhood plan might supersede. The council could also commit to spending the neighbourhood portion of the Community Infrastructure Levy in the area in which the payable development took place, and it should confirm that spending this portion could be informed by projects and aspirations identified through the neighbourhood planning process.

Wimbledon: Policy N3.6 continued

Question 13: Do you agree this policy ensures that Wimbledon continues to be a thriving destination for businesses, local residents and visitors?

More needs to be done on this policy.

The objectives should be changed to encourage:

- 1 **incremental change to a zero energy** and sustainable locality, commensurate with Climate Emergency goals; without this emphasis, nothing in Wimbledon will contribute to a thriving destination;
- 2 Then to **conserve local character**, which is an important factor in residents' and visitors' experience of Wimbledon, then
- 3 **Greening** and lastly
- 4 **Vibrant** town centre, characterised by appropriate change, rather than growth.

Question 14

Hotels: We dispute the need for any further hotel development in Wimbledon.

Building height: Any and all development to attract business and visitors, conferences and culture must **respect local character and heritage and be no more than 6/7 storeys high**.

We do not accept a height of 44m for any location (in and around station, St George's Road, etc): the **height limit for those locations should be 22m** as the public has consistently said.

Renovation of buildings: We do not accept the proposal that key sites should be redeveloped: existing (often modern) buildings should be **renovated to be sustainable**, not wastefully demolished.

Concert hall: We wish to see a concert hall or centre for performing and creative arts included with stronger commitment and enthusiasm in the plan (see under Wi5 below).

Conservation areas: A new policy is needed to promote the retention and renovation of both Conservation Areas (Broadway & Wimbledon Hill Road) as places with smaller units.

Vibrant but controlled: The **promotion of a vibrant day/night economy** should be explicitly balanced by the effective protection, through policy, of the quality of life of the residents nearby and a character in Wimbledon that is attractive to other users.

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Crossrail 2: The new railway is unlikely to be built in the foreseeable future, but the safeguarding and continuing long-term planning will blight the town centre. The local plan must show how the council will plan in a way that remediates this and provides a flexible strategy for an uncertain future.

Station redevelopment, new bridges over tracks, links to nearby sites, new town square: the Plan does not give enough detail/ is too vague. **Detailed plans required for public consultation,** to protect local character and residents' quality of life, given the significant impact this will make on people living in the residential areas that surround the town centre.

Location of tram stop: Tram stop to continue to be located inside the current and any future or rebuilt station.

SITE ALLOCATIONS Question 14 continued:

Please see below our comments in relation to the Local Plan proposals for certain Wimbledon sites.

Our general comment on all site allocations is that they are vague. More detailed consideration and information is needed to prevent inappropriate and speculative development that contributes nothing to the character of the local area, its community or its economy. Every development of a town centre site should be the subject of a detailed masterplan (see above) and a public consultation.

Wi 2 Broadway car park, adjoining the council-owned listed theatre: there is a wide variety of proposed uses and there is a regrettable lack of detail in the draft plan. As landowner the Council is in a strong position to enhance the area and its character, for example by giving the College of Art a strong presence in the town centre. We would hope to see the site developed primarily for community use.

Wi 5 Hartfield Road Car Park (council-owned) The proposal says development could include taller buildings (see the Future Wimbledon SPD) with a wide variety of uses. The statements are vague. As owner, the council can control development to ensure that the site delivers a public good, rather than a short-term profit. There is a clear opportunity to create a concert hall or centre for performing and creative arts that would be of local, London-wide, national and international significance. The creative arts functions could link very productively with a College of Art building on the Wi2 site. Higher buildings on this site would not be acceptable; they should be limited to 22m as repeatedly expressed by local people, not 44m as in the SPD.

Wi 6 Highlands House, 165 The Broadway: We oppose higher buildings: heights should be restricted to 22m or 6/7 storeys.

Wi 8 South Wimbledon Underground Station: TfL-owned: This threatens to demean the listed Holden frontage. The vague list of uses is unhelpful.

Wi 9 8 St Georges Road (former Community Centre site): Council ownership means community interests can and should be prioritised. More detail on the use of this site is needed and community use should be included and prioritised. Building height should be limited to 22m as the public has repeatedly said, not 44m.

Wi 10 Prospect House, St George's Road: The height limit should be 22m as public has repeatedly said, not 44m.

Wi 11 Victoria Crescent, including Piazza: The local plan should mention that the Broadway frontage is a conservation area. The route through the site is a public highway and must be kept. The piazza-type space is now a part of the town and should be kept; and there is need for a phased development plan as sub-site leases fall in.

Wi 13 Sainsburys, 8 -20 Worple Road: There is an opportunity here for new public routes to include cycleway, road widening to accommodate cycle lanes and a tree-lined boulevard (Future Wimbledon SPD). The height of the building should be limited to 22m as the public has clearly said, not 44m as in the Future Wimbledon SPD.

Wi 15 YMCA in The Broadway: See Friends of Wimbledon Town Centre representation to Planning Applications Committee (July 2020), in particular concerns about the scale and mass of the building and the impact on local residents, public space, materials.

Wi 16 Centre Court Shopping Centre: SLI agents' teaser has caused great concern. It is essential that the council protects the conservation areas along Queens Road and The Broadway, two listed buildings and the South Park Gardens Conservation Area. Redevelopment of such a modern 1980s complex fails against policy CC8.14. Building height should be limited to 22m, as the public has repeatedly said, not 44m. Space for a wider tram stop should be incorporated into the station site, and not be sited in Hartfield Road. Centre Court would benefit from some renovation/refurbishment without any increase of scale; it should not be developed independently of Crossrail 2.

Questionnaire Section 5 Housing

Question 17 H4.2 Housing provision

Do you agree this policy supports the aims of delivering additional homes for the plan period?

More needs to be done on this policy. **It is not clear how the target of 13,770 additional homes to be provided up to 2035, which is 918 homes pa, will be achieved, nor how it will be financed. There is insufficient detail on the proposal and its implications.**

Question 18 H4.2 Housing provision

New build: Optimising/maximising the density of new build must not be at the expense of local character nor at the expense of quality of life for residents. More policy detail is needed to ensure that design preserves/enhances local character and promotes all residents' experience.

Questions 27-28 H4.7 Build to rent

Do you agree that this policy sets out the requirements concerning Build to Rent proposals?

More needs to be done on this policy. The statements are too vague; there is insufficient detail or justification; the figures and targets have not been justified and appear not to consider effects on local areas or public funds. They threaten developments of unwelcome density.

Questionnaire Section 6: Places and spaces in a growing borough

Question 29 D5.1

Do you agree that this policy clearly sets out the strategic requirements of good design? More needs to be done on this policy. The policy needs to incorporate strong protection for neighbours on daylighting, sunlighting, privacy, archaeology.

We do not agree to tall buildings in Wimbledon Town Centre: local people have consistently said that new buildings should not be higher than 6/7 storeys/22m.

Question 30 D5.1

High architectural/design quality: more detail and rigour are needed so that this is more than a meaningless phrase that threatens cynical and exploitative misinterpretation. Policy needs to be more positive on enhancing conservation areas and other heritage.

Questions 31-32 D5.2 Urban design and public realm

Do you agree that this policy ensures the creation of sustainable, efficient and high quality design and layout of the urban environment?

More needs to be done on this policy. **The policy needs explicit targets and standards.** Policy also needs to emphasise the **protection of privacy and daylight/sunlight** against potentially intrusive development.

Questions 35-36 D5.4 Alterations and extensions to existing buildings.

Does this policy achieve its aim of achieving high quality design and protection of amenity within the borough for alterations and extensions to existing buildings?

More needs to be done on this policy. The draft plan notes (5.4.2) that 'the council's Borough Character Studies [and] Conservation Area Character Appraisals guide applicants'. The local plan should include a commitment to keep these documents up to date to reflect changes that have taken place since they were originally written, and to write those documents which are still missing.

The draft plan says (5.4.3) that the council will 'encourage new extensions to be contemporary in form where the architectural quality is exceptional and the building and context can sustain this without having a negative impact on the host building or adversely affecting a positive prevailing street character.' It is not clear what this means. Every new building is contemporary in form, unless it is a copy of a historic building. The plan should explain clearly that the quality of design and the response of a building to its context is usually more important than the specific architectural style that is adopted.

Questions 37-38 D5.5 Managing heritage assets.

Do you agree that this policy will conserve and where appropriate enhance Merton's heritage assets and distinctive character?

More needs to be done on this policy. The draft plan mentions here again 'Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Studies.' The local plan should include a commitment to keep these documents up to date to reflect changes that have taken place since they were originally written, and to write those documents which are still missing.

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Questions 41-42 D5.7. Digital infrastructure

More needs to be done on this policy. The draft plan specifies: 'In particularly sensitive areas, notably where heritage assets are affected, locate equipment in underground chambers.' The plan should recognise that there are likely to be many places that are particularly sensitive to the impact of telecommunications equipment.

Section 9 ECONOMY**Question 67 Policy EC7.1 Promoting economic growth and successful high streets:**

Do you agree this policy supports economic recovery, business investment and jobs growth? More needs to be done on this policy. The draft plan writes of 'Providing a presumption in favour of development that raises the number and range of jobs and increases the diversity of businesses where it meets other policies in this plan.' This sounds like facilitating the creation of jobs and increasing the diversity of businesses is the main goal, to which other policy areas are subsidiary. Job creation is important, but it must be seen as part of a balance of goals that include tackling climate change and creating an environment where people will enjoy living and working.

Question 68 Policy EC7.1 Promoting economic growth and successful high streets:

The draft plan calls for 'Strengthening the NPPF's "town centre first approach" by encouraging a range of appropriate town centre uses, not limited to retail, that generate a large number of trips towards Wimbledon (major town centre)' and 'Encouraging complimentary [sic] businesses, services and activities in our town centres that will enhance the vitality and vibrancy of the centre, including uses that will add to the visitor attraction of the town centre and meet the changing needs and desires of tourists and high street visitors'. The plan should recognise that the aim should be not just to generate trips, but to make Wimbledon town centre a great place for the people who already live and work there.

Question 75. Policy TC7.5 Merton's town centres and neighbourhood parades

Do you agree this policy supports our town centres and neighbourhood parades, through improving the character and local environment?

More needs to be done on this policy. The draft plan states (7.5.8): 'Changes to the Use Class Order in 2020 support greater flexibility (either by permitted development or prior approval) to a wide range of commercial, business and services, local community and learning. Merton is supportive of the principle of greater flexibility in what business or community space can be used for and may help to accelerate opportunities for new enterprises, jobs and different ways of working, thus helping with the Covid19 recovery and providing new services to residents. However Merton also wants to avoid unintended consequences of greater flexibility, such as the loss of small shops or other vital businesses that provide local services and support a thriving town centre.' The plan needs to reflect how – or if – being 'supportive of the principle of greater flexibility' can be reconciled with avoiding 'unintended consequences of greater flexibility', making the most effective possible use of the planning system.

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Question 76 Policy TC7.5 Merton's town centres and neighbourhood parades

The draft plan states that 'The Future Wimbledon supplementary planning document should be used to guide development proposals in Wimbledon'. While the SPD does provide some useful guidance (supplementary to the previous version of the plan), its status in the planning process is much weaker than the local plan. For the council's vision for the borough to be brought into effect through development of buildings and spaces, that vision needs to be embedded (in appropriate detail) in the plan's policy, or in one or more neighbourhood plans (whose status in the planning process will be the same as the local plan, and much stronger than the SPD).

Questions 81-82 TC7.8 Food and drink / leisure and entertainment

Do you agree this policy supports food, drink, entertainment and leisure uses?

More needs to be done on this policy. The draft plan states (7.8): 'Protection of leisure and entertainment (j) Proposals for the loss of entertainment and leisure facilities will be supported where the applicant can demonstrate to the council's satisfaction that the leisure and entertainment uses are no longer viable.' The plan should demonstrate (in a situation where there is intense pressure to create valuable housing, with the loss of valued local facilities), what level of evidence it will insist on.

Question 83 TC7.9 Culture, arts and tourism development

Do you agree this policy supports the provision of cultural, arts and tourism uses?

More needs to be done on this policy. As neither the description nor justification of this policy seem to be accessible online, we cannot agree that this policy supports the provision of cultural, arts and tourism uses.

Question 84 TC7.9 Culture, arts and tourism development

The omission of any reference to seizing the opportunity to create a music centre for local, London-wide, national and international performers and audiences is to be regretted. Such a project has had significant public support in Wimbledon for many years.

Section 12 CLIMATE CHANGE**Questions 118-119 CC8.10 Promoting sustainable design to mitigate and adapt to climate change**

Do you agree this policy supports the aim of making Merton a more environmentally sustainable place and net-zero carbon by 2050?

More needs to be done on this policy. To mention just one particular issue, the draft plan notes (1.1.155) that 'The borough is very susceptible to surface water flooding. ... With climate change predicting more frequent short-duration, high intensity rainfall and more frequent periods of long-duration rainfall, coupled with an ageing Victorian sewer system and increasing pressure from growing populations, surface water flooding is likely to be an increasing problem.' In this context the plan should explain the importance of front gardens and include policies to protect them. The plan should explain that front gardens can make walking a pleasure, promote sociability, contribute to biodiversity, reduce the danger of

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flooding and make streets safer. Front gardens have more impact on the face of residential areas within our towns and cities than any other element of the streetscape. Yet every year thousands of front gardens are paved over: their qualities are being eroded at an unprecedented rate.

-----Response to consultation from Friends of Wimbledon Town Centre ends.-----