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Dear Sir/Madam,

Please see below our response to the consultation on the draft Local Plan as it relates to Wimbledon town centre:

## **1. Building heights**

We are extremely concerned that the draft Local Plan assumes a need for denser development and more “mid-rise” buildings in Wimbledon town centre, to enable commercial growth. These could be up to 18 storeys high.

Definitions of “high-rise” and “mid-rise” may vary, but the fact is that any new buildings exceeding 7-8 storeys will tower over the existing townscape and radically alter the skyline for residents – not just those living in neighbouring streets but also those further afield.

The proposed scale and intensity of development are wholly inappropriate for Wimbledon town centre. They would adversely impact neighbouring residential areas and would change the essential character of Wimbledon, whilst exacerbating current traffic congestion and pollution issues in the town centre.

The building heights assumed in the Local Plan – particularly around St George's Road, Worple Road, the station and the area around the current YMCA – are significantly higher than existing buildings and represent much more than “a moderate increase in heights”. The height of buildings should be subject to a comprehensive cap of 7-8 storeys.

We also believe that building heights should be capped at a certain number of storeys in relation to their current height. It should not be possible for example to replace a 2 storey building with 8 storeys. As part of the Local Plan process, the Council should adopt a formula whereby it permits the lesser of a % increase in the height of the current building and a cap; and the formula should apply to buildings which are shown in the plan as intended to be more than 4 storeys high. For example, with a maximum 50% increase in height with a cap of 8 storeys, then:

- ) Any building on the plan proposed to be up to 4 storeys high stays as it is.
- ) Any current 3 storey building, other than those included in the point above above, could become 6 storeys, 4 could become 8, but 5 could only be 8 as well.

## **2. Evidence base**

The draft Local Plan contains little or no data to justify the suggested need for a projected 50% increase in commercial space in the town centre. Growth in demand appears simply to be assumed, on the basis that ‘if we build it, they will come’.

No account appears to have been taken of new technologies, more flexible ways of working and changing shopping and commuting patterns, which taken together are likely to reduce the demand for traditional office and retail space over the next 20 years.

### **3. Definition as a Metropolitan Centre**

In the Mayor of London's draft London Plan, Wimbledon is defined as a "Major Centre", with high commercial and residential growth potential.

But in the draft Local Plan, Merton Council states that it would like to see Wimbledon recognised as a "Metropolitan Centre". This would allow much larger scale development akin to centres like Croydon or Kingston.

We reject this vision of Wimbledon's future as fundamentally undesirable. The town centre is bounded by residential streets on all sides, making large scale redevelopment problematic. Whatever the Leader of the Council may say, we do not want Wimbledon town centre to become a "mini Croydon".

### **4. Crossrail 2**

The Council has a duty to plan for the future of Wimbledon town centre, regardless of whether the Crossrail 2 project proceeds.

In reality however, the levels of investment needed to develop Wimbledon in line with the vision set out in the draft Local Plan are heavily dependent on Crossrail 2 going ahead. For example new railway crossings are clearly necessary to relieve the pressure on Wimbledon Bridge and tackle the terrible traffic congestion in and around Wimbledon. Yet these are not promoted via the draft Local Plan.

### **5. Historic buildings**

The Council's own research has shown that Wimbledon's heritage and sense of community are highly valued by residents. Yet the draft Local Plan - and the 10 relevant sites already under consideration for development - give insufficient weight to residents' clearly expressed wish to preserve historic buildings and facades wherever possible. It is vital that the heritage of Wimbledon is preserved for future generations and not sacrificed for the sake of ever denser development.

### **6. New concert hall**

Plans have been developed by the Wimbledon Concert Hall Trust for a new performance venue in central Wimbledon. An obvious location would be the Council car park next to Morrisons, but the Council has yet to give its backing to this use of the site.

A world-class performance venue would be a huge asset to the cultural life of Wimbledon. It would also help to attract visitors and businesses to Wimbledon, increase the number of overnight stays and boost overall economic activity. The Council should give the Concert Hall proposal more enthusiastic support and more prominence through the draft Local Plan.

## **7. Consultation process**

The consultation process for the draft Local Plan has been inadequate. Given their importance to everyone who lives and works in Merton, it is not enough simply to publish the documents on the Council's website and place hard copies in libraries. With such 'passive' methods of communication, most residents are likely to remain in ignorance.

The Council should have been more proactive and should now consider further promotional activities prior to making any further decisions on the draft Local Plan.

## **8. Building materials**

The building materials promoted in the draft Local Plan should be in line with those that form Wimbledon's heritage characteristics e.g. Portland stone and London stock bricks. They should not be synthetic materials such as those seen on an increasing number of the recently constructed buildings along the Broadway.

## **Conclusion**

The nature and scale of development proposed for Wimbledon town centre in the draft Local Plan are such that we cannot support it as currently drafted.