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From: S Hadjioannou [Redacted]
Sent: 05 January 2019 13:00
To: Future Merton
Subject: Future Wimbledon Masterplan Consultation
Attachments: Representations to Merton Local Plan Review and Future Wimbledon Masterplan December 2018.pdf

Dear Sir, Madam,

We act on behalf of Hermes Property Unit Trust and hereby submit representations to the current consultation for Future Wimbledon Masterplan, before the deadline of Sunday 6th January 2019.

We would welcome acknowledgement of receipt of these representations, including being kept informed of future consultation.

If you have any queries or require additional information, please do not hesitate to contact me.

With regards

[Redacted]

S Hadjioannou

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[Redacted]

[Redacted]

[Redacted]

04 January 2019

Delivered by email

Future Wimbledon Masterplan Consultation
London Borough of Merton
Civic Centre
London Road
Morden
Surrey
SM4 5DX

Dear Sir, Madam,

FUTURE WIMBLEDON MASTERPLAN CONSULTATION

We act on behalf of NATWEST Trustee and Depository Service Limited as Trustee for Hermes Property Unit Trust and have been instructed to submit representations to the Future Wimbledon Masterplan consultation document, consultation for which ends on 6th January 2019.

The Development Plan for Merton comprises Merton's Core Planning Strategy (2011) and Merton's Sites and Policies Plan (2014). In addition, Merton's new Local Plan is also published for Consultation at Stage 2, which ends on 6th January 2019.

These representations are therefore submitted having reference to the Development Plan, the National Planning Policy Framework (NPPF) (2018), the adopted London Plan (Consolidated with Alterations 2015) and the emerging replacement London Plan (2017).

General Comments

We consider the Masterplan document to be very informative, providing a thorough understanding of the development of Wimbledon Town Centre, the challenges it faces, including incorporating Crossrail 2. It is clear that extensive front loading of community engagement has been undertaken to inform the Masterplan which accords with the principles laid out in the NPPF.

We also commend the approach taken in recognising economic development as a central plank to moulding future development opportunities.

Our Client

Hermes Property Unit Trust maintains a long term interest and holdings within Wimbledon Town Centre, specifically within the Hartfield and Victoria Neighbourhood (No.09). A sister fund also has long standing interests, principally Wimbledon Bridge House, also within the same Neighbourhood which has recently undergone extensive refurbishment.

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These representations are formulated to provide overall support for the Merton's vision for Wimbledon Town Centre to ensure a vibrant and viable town centre for the future. However, our comments are tempered against the need to ensure realistic economic considerations faced by land owners and developers in bringing the development envisaged forward, including the balance that should be struck when considering economic benefits against preserving the heritage character of the area. In particular, development viability in terms of commercial floorspace demand, including height, scale and massing should form an important driving consideration to delivering the overall aims of the Masterplan.

National Planning Policy Framework (NPPF) 2018

We therefore consider that the guiding principles for the Masterplan should be the NPPF, the key guiding principles forming the starting point i.e. the presumption in favour of sustainable development and not providing over restrictive obstacles to development. For the plan making process such as the Masterplan and the new Local Plan, this means (as set out at paragraph 11.):

a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as needs that cannot be met within neighbourhood areas, unless:

i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

In terms of non-strategic policies as set out in paragraph 23 should be positively prepared, justified, effective and consistent with national policy.

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

Against this backdrop, the Masterplan should draw upon the guidance provided in Section 6 of the NPPF, i.e. 'Building a strong, competitive economy', especially that at paragraph 80 which states that: "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

In terms of achieving physical development, paragraph 122 encourages support for development that makes efficient use of land, including local market conditions and viability and at paragraph 127 c) be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

Merton Masterplan- Building Height Guidance

Building Height Guidance for the Masterplan area is provided on Pages 92 to 93, which stipulates building heights. Notwithstanding the close colour coding for proposed heights, which is considered confusing, we consider that stipulating storey heights alone does not provide the flexibility or a true representation as to what can be delivered on the ground. We therefore suggest that alongside storey heights, an option of AOD should be provided, as some buildings may achieve 9 storeys and still fit within the maximum AOD

of some existing sites i.e. the Pinnacle and Wimbledon Bridge House. This would in our view allow sufficient flexibility for the design of new development, especially where plant requirements are taken into consideration, forming as they do an important part of the overall design of modern buildings.

Moreover, and although the context sections of the Masterplan attempt to set out the baseline for the consideration of height, it is not clear how the proposed heights have been derived. The guidance is overly rigid in designating blanket height limits across the proposed neighbourhoods. If this is meant to be a guide, then the Masterplan should explicitly stage degrees of flexibility and how these will be assessed, for instance and in addition to our comments regarding storey versus AOD height, market demand and viability considerations. The Masterplan should also recognise the difficulties of site assembly for some sites, given their restrictive nature and the requirement to provide a mixture of uses, especially at lower levels, plant and other servicing requirements.

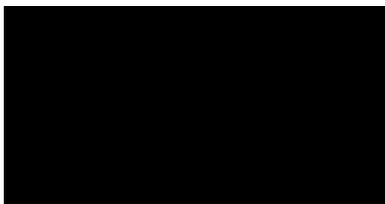
Neighbourhood No. 9- Hartfield and Victoria

We support the general vision for the neighbourhood, especially the mixture of uses, including commercial, retail, leisure and cultural facilities. We also support the notion of delivering intensified development as redevelopment opportunities arise.

Within the context of our comments to the building height guidance above, we consider that a blanket restriction on upper limits for height is unreasonable as some sites are more restricted by size, depth and site assembly, especially along Hartfield Road, which reduces the ability of some sites to provide the floorplates and gross internal floorspace per floor required by tenants. The Masterplan should therefore allow flexibility on a site by site basis whilst ensuring that the developments cumulatively remain within the 'Building Height Guide'.

We would welcome the opportunity to comment on further stages of the Masterplan. In the meantime, if you have any queries or require additional information please do not hesitate to contact me at this office.

Yours sincerely



S Hadjoannou
Director

