

FutureMerton Team
London Borough of Merton
London Road
SM4 5DX

4 January 2019

By Email

Dear Sir/Madam

MERTON LOCAL PLAN 2020 - STAGE 2 CONSULTATION – REPRESENTATIONS MADE ON BEHALF OF KINGSTON ESTATES

On behalf of our client, Kingston Estates, we write in relation to the Draft 2020 Merton Local Plan, to express support for its strategic aims and objectives. Kingston Estates is supportive of the need for the London Borough of Merton (LB Merton) to prepare a new Local Plan, given the change in national and regional policy guidance, and the significant investment that will arise in the Borough through strategic infrastructure interventions such as Crossrail 2. The identification of the Wimbledon/Colliers Wood/South Wimbledon Opportunity Area in the draft London Plan for 5,000 homes and 6,000 new jobs means that the Local Plan needs to be updated to respond to these growth aspirations, regardless of whether Crossrail 2 is delivered. Subject to the final growth figures being agreed as part of the draft London Plan EiP process, there will be a significant increase to that currently accommodated in the adopted Local Plan. Kingston Estates is supportive of LB Merton's approach to economic and employment growth.

Kingston Estates owns 1-4 Francis Grove ('the site'), located in Wimbledon Town Centre, on land bound by St George's Road and Francis Grove. A site plan is provided alongside these representations. It currently comprises an office building, consisting of ground plus three storeys, with low quality architecture. The draft Wimbledon Town Centre Masterplan (2018) identifies the site as an unpopular building with local residents, with an unattractive streetscape. To the north of the site, along Worple Road, the properties comprise a mix of uses which are predominantly commercial.

Site allocation

The buildings surrounding the site are also predominantly in office use, and benefit from allocations in the draft Local Plan (28 St George's Road (community centre) also has an allocation in the adopted Sites and Policies Plan 2014), as set out in the below table.

PROPOSED ALLOCATION	LB MERTON'S PROPOSED USES
Wi9 – 28 St George's Road	Proposed Site Allocation: Any of the following or an appropriate mix of town centre type uses such as D1, A1, A2, B1a, C3, C1. The site is surrounded by commercial uses and neighbouring sites have also been submitted for development. There is an opportunity for a coordinated approach to design and delivery from Wi9, Wi10, Wi13 and Wi14. Opportunities to provide modern business floorspace and active frontages. [Same as Site allocation 31 in Sites and Policies Plan 2014]
Wi10 – Prospect House, 30 St George's Road	Proposed Site Allocation: B1a or C1 hotel. There is an opportunity for a coordinated approach with Wi9, Wi10, Wi13 and Wi14. Opportunities to provide: active street frontage along St George's Road, new pedestrian route to break up existing large block, and well-designed, modern, commercial floorspace to support businesses and jobs within Wimbledon Town Centre.
Wi13 – 8-20 Worple Road and 20-26 St George's Road	Proposed Site Allocation: Any of the appropriate mix of town centre type uses such as A1, A2, B1a, C1 hotel, D1. Opportunities to provide: a coordinated approach with Wi9, Wi10, Wi13 and Wi14, active street frontage along St George's Road, new pedestrian route to break up existing block, and well-designed, modern, commercial floorspace to support businesses and jobs within Wimbledon Town Centre.
Wi14 – 22-24 Worple Road	Proposed Site Allocation: Any of the appropriate mix of town centre uses such as D1, A1, A2, B1a, C1. There are opportunities for: a coordinated approach with Wi9, Wi10, Wi13 and Wi14, active street frontage along St George's Road, and to provide a well-designed, modern, commercial floorspace to support businesses and jobs within Wimbledon Town Centre.

There is a discrepancy with the site allocation references on the sites plan on page 11 of Policy N3.6 Wimbledon.

It is clear from these proposed site allocations, that there is an acceptance of the opportunity for this highly accessible (PTaL 6b) area of Wimbledon to deliver modern, commercial floorspace. The site, therefore, has the potential to contribute to this cluster of buildings, creating modern floorspace for businesses, complementing the surrounding area and providing an active ground floor street frontage to contribute towards the vibrancy and vitality of Wimbledon Town Centre. However, Kingston Estate's site does not currently benefit from a site allocation in Draft Local Plan.

Our client is in pre-application discussions with LB Merton regarding the redevelopment of its site. The site plays a key part in the future regeneration of Wimbledon Town Centre and achieving the aims of the draft Wimbledon Town Centre Masterplan, in creating an office quarter around St George's Road. Paragraph 7.1.4 of the draft Local Plan states that one of the Council's main aims is to be "open for business", providing suitable and well-located space for a wide variety of businesses, which Kingston Estates supports. As part of this, there will be an ongoing demand for modern office floorspace in Wimbledon Town Centre, commensurate with its international reputation and levels of growth anticipated in the Draft London Plan. GLA Economics Labour Market Projections (2017) estimate that Merton will have 21% additional jobs by 2041, one of the highest increases in South West London. Therefore, it is important that the Local Plan allocates a sufficient quantum of floorspace/sites at this stage to enable the growth to be realised. This is of strategic importance to London as well as LB Merton.

For LB Merton, the draft Wimbledon Town Centre Masterplan (page 43) notes that the supply of office space within Wimbledon is “extremely limited, with availability of less than 2% being available” and also highlights that the majority offices with large floor plates are fully occupied, with limited Grade A quality office space. To help combat this, the draft Wimbledon Town Centre Masterplan encourages more office growth in Wimbledon. Within this, St George’s Quarter is identified as an area suitable for employment led intensification.

We request that 1-4 Francis Grove is included in the emerging Local Plan as a site allocation for new, high density B1 office floorspace and/or any of the appropriate mix town centre types (A1, A2, A3, B1a, C1, C3). This would be commensurate with the surrounding site allocations of the draft Local Plan, assist in achieving the employment growth ambitions of both LB Merton and the GLA in its Draft London Plan, and ensure consistency with the aims of the draft Wimbledon Town Centre Masterplan. It would also strengthen the adopted and emerging planning policy and guidance context for delivering an office quarter in this area of Wimbledon, including the Council’s commitment in draft Policy Ec7.1 (Economic Development) to ensure an adequate supply of viable and appropriate sites/premises for employment use in sustainable locations.

Taller buildings

Kingston Estates fully supports draft Policy N3.6 (Wimbledon Town Centre) objective “to ensure that Wimbledon continues to be a thriving destination for businesses, local residents and visitors” and LB Merton’s aspiration for Wimbledon to be a Metropolitan Centre. As identified elsewhere in the draft Local Plan and this draft policy, St George’s Road (including Kingston Estates’ site) is identified as an appropriate location for taller buildings and higher density development in Wimbledon town centre. Criterion c) supports “midrise contextual architecture with traditional urban blocks of high quality design, active streets and a tight grain to promote pedestrian routes”. Kingston Estates agrees that flexibility is required in the scale of taller buildings in the area and that this needs to be well-considered as part of a robust contextual analysis. No definition is provided for the term ‘mid-rise’ and we agree that this should be defined on a site by site basis.

Alongside the aspirations to deliver office floorspace in St George’s Quarter is the ambition to deliver high quality design, which Kingston Estates supports, particularly on sites which are suitable for higher density development and/or for a taller building. Kingston Estates supports the acknowledgment that views from Wimbledon Hill should be respected, with taller developments set away from the historic core and instead located at St George’s Road (amongst other locations) (draft Policy N3.6d). In relation to tall buildings and local views, part d) of Draft Policy D5.2 states that an important principle of good urban design is “the maintenance and enhancement of identified important local views, panoramas and prospects and their settings”. This policy should define a local view and clarify where these are identified, for example on the Policies Map and the differentiation between a local view and an important local view. We suggest that the policy wording is also amended to read “the maintenance **and/or** enhancement” given that some of the identified development sites may change the character of the local views.

Taller developments can be a way of signifying change and regeneration in an area, and draft Strategic Policy LP D5.1 is supportive of taller buildings in the town centre, providing certain criteria are met. Kingston Estates is supportive of a criteria-based approach, rather than providing an indication of what height may be acceptable for each allocation, given that this is best assessed on a site by site basis with design being a key consideration. We do however have comments in relation to draft criteria f(ii) and f(iii):

- f(ii) states: “Ensure the ground and first floors are designed for a human scale and maximise the amount of active frontage and natural surveillance.” The requirement for an active frontage is

usually targeted at the ground level and we request that the policy makes this clear, with first floor not being a requirement and to be assessed on an individual site basis.

- f(iii) states: *“Be of exceptional design and architectural quality”*. Kingston Estates fully supports the need for high quality development. The wording of this criterion however needs to reflect the NPPF 2018 and the draft supporting text to the policy. The NPPF requires design to be of a high quality and well-considered, there is no requirement for ‘exceptional’ design – this requirement is only in relation to isolated homes in the countryside.

Public realm

Draft Policy D5.2 states: *“Proposals for all development and works to the public realm must be of the highest standard and adhere to the most appropriate policy guidance and best practice”*. There is no national policy requirement for works to generally be of the “highest standard”. The draft London Plan is explicit and seeks the highest standard of ‘inclusive design’. We request clarity on this policy requirement and that it reflects the NPPF.

Transport and infrastructure

The current Draft Plan does not provide maximum and minimum cycle or car parking standards, which should be included to ensure that sustainable modes of travel are encouraged throughout the Borough and to ensure such standards are incorporated into developments from the outset.

Summary

In summary, these representations have been made to confirm that the site at 1-4 Francis Grove is deliverable in the short term i.e. 1-5 years and suitable for redevelopment in line with the other proposed draft allocations in St George’s Quarter. Kingston Estates will continue to progress its application for an employment-led scheme on its site and requests to be notified of upcoming consultations.

Yours faithfully



SARAH STEVENS
SENIOR DIRECTOR

