

## **Response by PlanWimbledon, the prospective neighbourhood forum, to Merton Council Stage 2a Draft Local Plan Consultation**

### **PlanWimbledon's responses**

The responses and representations to Merton Council on its draft Local Plan are linked below to the questions in the online questionnaire, under appropriate sub-headings. Elsewhere we have included paragraphs under our own headings.

As the prospective neighbourhood forum for Wimbledon, PlanWimbledon welcomes the draft plan, which contains many policies that have the potential to raise the standard of development in Wimbledon 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**

We propose that the plan's **urban development objectives** should be reordered to reflect different priorities. In the draft the order is:

1. Supporting Resilience
2. Good Growth
3. Tackling Climate Change
4. Place plans and the 20-minute neighbourhood
5. Places for people

We propose a new order for the urban development objectives:

1. Tackling Climate Change – make Merton an exemplary borough in mitigating and adapting to climate change.
2. Place plans and the 20-minute neighbourhood – to promote a high-quality urban and suburban environment in Merton.
3. Supporting Resilience – supporting resilience and recovery, to create the conditions for sustainable growth and direct the benefits of growth.
4. Good Growth – to create the conditions for growth and minimise the impact of development.

5. Places for people – to provide new homes and infrastructure within Merton’s town centres and residential areas.

#### **Questionnaire Section 4: Neighbourhoods**

##### **Wimbledon: Policy N3.6**

**PlanWimbledon wishes to make some important points about four issues:**

- Neighbourhood planning
- Pandemic and post-pandemic planning
- Future of Wimbledon SPD
- Masterplans for major sites

#### **Neighbourhood planning**

The local 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 must 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.

The 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 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.

But Merton faces the challenge of government policy expressed in statutory instruments and new planning law. We urge Merton Council to generate more opportunities for locally responsive placemaking.

### **Pandemic and post-pandemic planning**

Merton Council needs to think about the implications of the Covid-19 pandemic and to plan for the post-pandemic borough, supporting active travel and the concept of the 20-minute neighbourhood. Additionally, it should also plan for a future in which we may face other pandemics. While the local plan (7.1.3) recognises that *“there are a variety of predictions regarding the shape of post-pandemic economic recovery”*, the local plan continues to focus on the same pre-pandemic priorities.

### **Future of Wimbledon SPD**

In the light of the impact of the Covid-19 pandemic, it is now time to review and challenge the assumptions in the Future of 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 likely to be less need for the scale of employment floorspace (and associated height of buildings) proposed in the SPD.

The Future Wimbledon SPD says that it *‘sets out [how] Crossrail 2 could fit into the urban fabric of Wimbledon and create new development sites above and around the rail infrastructure’*. The new draft local plan says (3.6.2) that *‘The Future Wimbledon Supplementary Planning Document (SPD) outlines the priorities for Wimbledon town centre’*. But the draft local plan also says (3.6.13) that *‘it is likely that Crossrail 2 will not be completed much prior to 2040, outside the lifetime of this Local Plan’*. This means that these major aspects of the SPD need to be reviewed. There is much in the SPD that the Wimbledon community has welcomed but we contend that the SPD cannot be a sufficient basis for *‘outlin[ing] the priorities for Wimbledon town centre’*.

### **Masterplans for major sites**

The local plan should create a policy specifying that 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 were submitted for the site in question. The local plan should set out a *‘masterplan protocol’*, specifying how the masterplan will be prepared by

the applicant in association with the council and that it will be subject to public consultation.

### **3.5 South Wimbledon**

We welcome the three key objectives for South Wimbledon, stated as:

1. Improving public realm and public space
2. Improving the environment
3. Promoting the town centre

‘Promoting the town centre’ would be better expressed as ‘Promoting the local centre’, as the draft local plan is proposing a new ‘local centre at the heart of South Wimbledon’, focused around the Underground station and junction, whereas ‘the town centre’ may seem to refer to Wimbledon town centre.

#### **Wimbledon: Policy N3.6 continued**

##### **Question 13**

We do not agree that this policy ensures that Wimbledon continues to be a thriving destination for businesses, local residents and visitors. Wimbledon should be regarded as more than a potential ‘destination’. We suggest that the policy should be ‘to ensure that businesses, local residents and visitors benefit from a thriving Wimbledon’.

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, gradual change, rather than unsustainable growth.

##### **Question 14**

##### **Building height**

Any and all development to attract business and visitors, conferences and culture must respect local character and heritage.

### **Renovation of buildings**

We do not accept the proposal that redevelopment will be appropriate for all key sites. Many 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 local plan (see under Wi5 below).

### **Vibrant but controlled**

Promoting 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.

### **Crossrail 2**

The new railway line 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**

Detailed plans will be 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**

The tram stop should continue to be located inside the current and any future or rebuilt station.

## **SITE ALLOCATIONS: Question 14 continued**

The draft local plan's proposals on site allocations are vague and reflect too little thought about the planning issues that the draft plan itself has identified as being important. This is the reason why we have proposed (above) that a masterplan should be prepared for every major site. Such 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 were submitted for the site in question.

### **Questions 17-18 H4.2: Housing provision**

We do not agree that this policy supports the aims of delivering additional homes for the plan period.

It is not clear how the target of more than 13,000 additional homes to be provided up to 2035 will be achieved or how it will be financed. There is insufficient detail on the proposal and its implications.

### **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 or enhances local character and promotes all residents' experience.

## **Questionnaire Section 6: Places and spaces in a growing borough**

### **Questions 29-30 D5.1**

We do not agree that this policy clearly sets out the strategic requirements of good design.

The policy needs to incorporate stronger protection for neighbours on daylight, sunlight, privacy, archaeology.

### **High architectural/design quality**

More detail and rigour are needed. We look for the local plan to recognise the potential role of neighbourhood planning in supporting the local plan's commitment to raising the standard of design in Wimbledon.

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

We do not agree that this policy ensures the creation of sustainable, efficient, and high-quality design and layout of the urban environment.

The policy needs explicit targets and standards. We also look for the local plan to recognise the potential role of neighbourhood planning in achieving this.

The policy also needs to emphasise the protection of privacy and daylight/sunlight against potentially intrusive development.

### **Question 35 Alterations and extensions to existing buildings: Policy D5.4**

This policy aims to achieve high quality design and protection of amenity within the borough for alterations and extensions to existing buildings.

### **Questions 35-36 D5.4**

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.

#### **Managing Heritage Assets: Policy D5.5**

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

#### **Questions 37-38 D5.5 Managing heritage assets.**

More needs to be done on this policy. The draft plan mentions here (5.5a) 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.

### **Section 9 ECONOMY**

#### **Question 67: Promoting economic growth and successful high streets: Policy EC7.1**

Do you agree this policy supports economic recovery, business investment and jobs growth?

#### **Questions 67-68 EC7.1**

More needs to be done on this policy. The draft plan (7.1.2a) 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 part of a balance of goals that include tackling climate change and creating an environment where people will enjoy living and working.

The draft plan (7.1.3a) 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 (7.1.3c) *'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 also make Wimbledon a great place for the people who already live and work there.

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

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

**Questions 75-76 TC7.5**

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 Covid-19 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.

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).

**Question 83: Culture, arts and tourism development: Policy TC7.9**

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

**Questions 83-84: TC7.9 Culture, Arts and Tourism**

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.

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**

### **Question 118: Promoting sustainable design to mitigate and adapt to climate change: Policy CC8.10**

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

### **Questions 118-119: CC8.10**

More needs to be done on this policy. For example, the draft plan notes (F8.10: 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. It is not sufficient to state (D5.2.j) *"Proposals for the conversion of front gardens for vehicle parking should not be detrimental to the character of the street or highway safety, such proposals are required to incorporate sustainable drainage"*. The plan should explain that a building's frontage can make walking a pleasure, promote sociability, contribute to biodiversity, reduce the danger of 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.

**PlanWimbledon**  
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