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From: [REDACTED] schofield [REDACTED]
Sent: 06 January 2019 20:17
To: Future Merton; [REDACTED]
Subject: Local Plan Consultation Response
Attachments: Response to MasterPlan & Local Plan Consultation v2.docx

Please find attached my formal response to the [Local Plan](#) consultation (please also accept this as a response to the concurrent Masterplan consultation).

Kind regards,

T [REDACTED] Schofield

WIMBLEDON MASTERPLAN AND MERTON LOCAL PLAN

I write in response to the current residents' consultations on the **proposed Wimbledon Masterplan and the Local Plan (as it affects Wimbledon)**. I do not believe that the information contained therein is truthful, straightforward or reasonably explained, nor have the consultations been properly communicated.

Both consultations contain proposals to dramatically alter the town of Wimbledon – probably the most dramatic change in 130 years. Business usage is designed to increase by 50%; the town centre is to be filled with 13-18-storey towers; and there is a **doubling in building height** in some areas (which immediately back on to 2 storey Edwardian terraces) along the Broadway. The scale, height and intensity of development proposed in the plan is wholly inappropriate for Wimbledon town centre. It would adversely impact neighbouring residential areas and would change the essential character of Wimbledon. It is completely contrary to the wishes expressed by residents.

The Local Plan states “Wimbledon is a long, linear town centre set at the bottom of Wimbledon Hill and tightly bound by attractive established residential terraces, some of which are within Conservation Areas” – I am sure that councillors can therefore appreciate the incongruity of Very Tall, Prominent Buildings (as defined in the council's own Tall Buildings Policy 2010) along a narrow strip of land (eg 14 storeys as proposed in Broadway East) surrounded by said residential properties?

My specific comments are listed below:

Content

1. Both Plans refer throughout to **Mid-Rise building height**. Quote “A mid-rise approach to urbanism is the council's aim.” In fact, the Masterplan mentions Mid Rise 17 times. ***The Masterplan also refers to the Tall Buildings Policy of 2010 as still being extant for this Plan.*** Quote “The long-term spatial strategy is to promote economic development and growth initially in the St George's Road and Broadway East areas. This strategy is concurrent with Merton's Core Strategy (principally the economic development and tall buildings policies).” ***The 2010 document defines Mid-Rise as 4-6 storeys (P 43 3.5.16)*** and in fact, there is a whole page in the Masterplan (p69) which shows photos of existing Mid-Rise Buildings, two of 5 storeys and one of 7 storeys. The text (p69) goes on to state categorically that the area is “not suitable for High Rise Towers” - defined in 2010 Plan as buildings over 11 storeys and mentioning eg Brown & Root Tower in Colliers Wood. (p43 3.5.18). ***BUT***, the context and content of these two plans seem to mean something ***completely different*** by Mid-Rise, with eg the proposed development of the YMCA (see 9 below) being in the plan specifically at 13-14 storeys (currently 7 storeys) and other buildings of up to 18 storeys. ***It appears that the definition of Mid Rise has been completely changed and that the old and new definitions are deliberately comingled in a way which is utterly misleading to anyone reading the documents. The opening sentence of the Purpose And Status Of The Plan*** Quote “The draft masterplan is based on the existing adopted planning policies in Merton's Local Plan” (P12) ***is blatantly false. Given how critical the definition of Mid-Rise is to a proper understanding of the documents, I believe that these consultation exercises are invalid, and should be reformed using honest and accurate information.***

At the Future Wimbledon meeting for residents on 12 Nov 2018, many residents expressed concern about the scale and volume of development planned, transforming Wimbledon into a 'mini Croydon'. Page 69 of the Masterplan says: “Wimbledon does need to become more

dense and accept a **moderate increase in heights** to accommodate future growth.” The current tallest buildings tend to cap at 7-8 stories and any increase in this will make the new buildings very prominent, dwarfing other buildings and housing in the wide vicinity. **The plans for St Georges Quarter and Broadway East represent more than a doubling in height of existing buildings – this is not a “moderate increase in heights” as defined in the Masterplan.**

The Local Plan states as an aim “*Respecting views from Wimbledon Hill s (sic) through the town centre and beyond, with taller developments set away from the historic core, located at the station, St George’s Road and Broadway East*”. Firstly, this statement completely contradicts itself - the station is the historic core, and St George’s Road is practically adjacent to it. Secondly, no view can possibly be respected by the development of 13-18 storey towers adjacent to the station.

I fully concur with the view expressed by residents, that “*the Masterplan should state unequivocally that new buildings in excess of 7-8 storeys are unlikely to receive planning approval because of their visual impact on the surrounding area, their incongruity with existing historic buildings and the increase in traffic congestion and pollution to which more intense development would inevitably lead.*”

2. **The Local Plan** states “*Promoting a vibrant daytime, evening and night time economy through a mix of uses*”. It is entirely clear from police reports, representations at Licensing Committee and the general state of the town centre re litter, vomit etc in the mornings, not to mention fights , late night noise and violence, that this council is unable to provide the amenities that even the existing infrastructure requires. It’s well known that the waste contract is not working, and police numbers have been cut significantly. And the local police station is scheduled to close. Until the council has a proven record in maintaining the cleanliness and safety of Wimbledon Town centre’s night-time economy, and keeping streets clean and free of litter, there should be no question of further development.
3. Quote from the Masterplan, “Within the mini-neighbourhoods, the priorities establish themselves into either distinct developments, enhancement projects or a more specific interpretation of existing Local Plan policies.” **This implies that the existing Local Plan is extant for guidance.** *In fact, nowhere in the Masterplan does the council explain that the Local Plan is being rewritten and consulted on **concurrently** with the Masterplan.* From the Council’s Future Wimbledon website, “This Masterplan supplements Merton’s existing planning policies to provide guidance for development, public spaces and to attract investment in SW19.” (2011 Core Strategy, 2014 Sites & Policies DPD). Because the proposed new Local Plan is not referred to as currently undergoing consultation throughout the Masterplan, both documents are misleading for public consultation.
4. Additionally, the dividing up of the town centre into “**Mini Neighbourhoods**” is an arbitrary and undemocratic delineation not agreed or consulted upon. For example, the “neighbourhood” area defined in the Masterplan as Broadway East takes no actual account of the **neighbourhood** (Victorian and Edwardian housing, substantial amount of which is included in a conservation area, parks, schools ie all residential except for the narrow strip that is The Broadway) in its proposal to make this an area earmarked for the building of Very Tall, Prominent Buildings (over 11 storeys as defined in the council’s own Tall Buildings Policy 2010). ie YMCA at 14 storeys

5. Although the Masterplan does state once that Wimbledon is defined as a **Major Centre** in the Mayor's London Plan, it then arbitrarily decides to refer to the town centre from thence forward as a **Metropolitan Centre**. In fact the latter is capitalised whereas "major" is not. At the Meeting held to discuss the Plan on 12th November, it became clear that this was **completely misleading** and Paul McGarry admitted that Wimbledon was **not** defined in the London Plan as a Metropolitan centre, but a Major one. The Future Wimbledon team has used this Metropolitan definition throughout the Plan and this has misled residents reading the Plan into thinking that this a London Plan definition of the town and therefore outside our control. **This is not the case**. The Local plan has as an aim, "*Strengthening the position of Wimbledon towards being a Metropolitan Centre in south London through the redevelopment of key sites within the centre*" – it was quite clear at the Meeting that this is against the wishes of residents.
6. The **London Plan**, referred to in the Masterplan, is mainly about the desire to achieve **strategic housing targets**. In its own consultation response, Merton considers this "proposed target unrealistic, unachievable" and yet the Masterplan makes no attempt to address strategic housing targets. **The Mayor's Plan also discourages speculative office development, which is the main focus of the Masterplan**. In its responses, Merton states, "*Part B precludes boroughs supporting any speculative development of offices.... Part B should be removed as unnecessarily restrictive and harmful to economic growth and jobs as it prevents boroughs from supporting office development unless there is "authoritative, strategic and local evidence of sustained demand for office based activities, taking into account projected demand for office based employment and office floorspace to 2014 in Table 6.1"*". This seems to support concerns raised at the Residents' Meeting regarding the lack of evidence of need for such an exponential increase in office space (8000 new jobs) in Wimbledon town centre. At the Meeting, residents reminded officers of the change in the way people work now – more and more employees work from home, hot-desk or rent a desk on an occasional or temporary basis – all reducing the demand for fixed office spaces.
7. The Masterplan includes 25 pages about the history of Wimbledon and also references at length the **workshops held throughout 2017 with residents** (including myself) to determine the future of the Town Centre and "*To shape the priorities for the Masterplan*". At these workshops, residents consistently expressed serious opposition to Tall Buildings and the plan produced is in **direct opposition** to these views. It is **completely misleading** to assert that residents' views have "*Helped define the range of priorities and ideas in advance of writing the Masterplan*" - the stated aim of the workshops. Residents consistently and emphatically stated that they did **not** want Wimbledon to look and feel like Croydon.
8. **The YMCA building – Masterplan** - has been slipped into the area map of Building Height as 13-14 stories, with no explanation of this doubling in height. Residents made it abundantly clear 5 years ago that this height is unacceptable and there was huge dissent at the time and the development was abandoned. For this to be slipped in as a tiny coloured dot on a map – an incongruous Very Tall, Prominent Building (as defined in the council's own Tall Buildings Policy 2010), backing on to the residential area of South Park Gardens, stealing light and sunshine from the whole neighbourhood, is manipulative, dishonest and disingenuous. In fact, all questions asked about this at the Residents' Meeting were ignored and the team specifically stated that they had no knowledge of any current plan from the YMCA or its developer partner. I believe from several sources that this is untrue and that residents were **intentionally misled** at the meeting. Residents will be responding to this plan without believing that there any imminent plans to develop the YMCA. One must also take note of

the precedent that such a development would start – PAC would not be able to refuse similar sized buildings once this was granted permission.

9. **Local Plan - Site Wi15 YMCA Wimbledon** – please see everything else contained in this response in reference to the proposed YMCA development. Neither the map area nor the text (deliberately?) mentions that this plot is immediately adjacent to some of the densest and historic housing in the area (Trinity & Abbey wards) and a Conservation Area (South Park Gardens) that it would dominate and overshadow. All that is mentioned is that *“The site is visible from South Park Gardens conservation area to the north.”* **This needs a lot more emphasis and impact assessment of any development.** It’s also on a busy junction. Insufficient parking restrictions already mean that local roads are full of cars using the theatre, cinemas etc in the town centre. Additional eating and recreational sites on this plot would exacerbate this problem. Experience shows that it is nonsense to assume that users of such facilities will all arrive on public transport.
10. **Local Plan - Site Wi8 South Wimbledon Station** makes no mention whatsoever of the proposed nearby new Harris Academy school and its massive impact on station and bus use in the vicinity. This is negligent and needs to be considered carefully with respect to the health and safety of both transport and road users at this busy station and intersection.

Context

11. The Plans as they refer to Wimbledon (& therefore presumably a knock-on financial effect to the rest of the borough), are totally dependent on the existing Crossrail 2 proposals for Wimbledon being agreed. **If Crossrail 2 does not materialise as predicted by the team producing the Plan, then we have the worst possible scenario.** The council will have given Planning Guidance allowing the building of Very Tall, Prominent Buildings (as defined in the council’s own Tall Buildings Policy 2010) down areas of the length of Wimbledon Broadway which will radically and drastically change the nature of the town centre. The increase in traffic will be unmanageable with only one road/ rail crossing – the Wimbledon Station Bridge and, as Paul McGarry stated at the meeting, there is no money for the council to build extra bridges without Crossrail 2 support. Infrastructure will not be in place to afford or manage such redevelopment. These documents should not be adopted until such a decision is more certain. It is right and proper that this potential impact should be planned for, but the Plans should remain as working documents, adapting to circumstances as required until there is further certainty as to the status of CrossRail2. Rushing through any guidance (Masterplan) or statutory interpretation (Local Plan) before CrossRail 2 or Brexit have been decided is hasty and restrictive.
12. See 12 above and without a concurrent, full and proper **Traffic Management Plan**, the Masterplan and Local Plan are both meaningless and incomplete for consultation.

Consultation process itself

- 13 **Inadequate and meaningless consultation.** Neither consultation has been sufficiently publicised by the council. They haven’t leafleted residents. No hard copies are available (other than a few placed in libraries). Given lack of space and quiet in our libraries, together

with restricted opening times and size of documents, this is not sufficient and they should be available to residents on request. They aren't. The proposed Local Plan, which I understand has statutory authority, is hardly even mentioned within the public realm. Given that a very full and glossy brochure, "Future Merton", is produced and distributed to all households regularly (metallic headlines on cover!), cost cannot possibly be used as an excuse for this paucity of consultation, which excludes large sections of the Wimbledon community whose age makes access to lengthy online documents impossible. The current issue of Future Merton, which dropped through doors in November, is a 46 page long magazine. Wimbledon Masterplan is mentioned on p22, with no reference to a consultation or a link to the proposals for comment. Quote from the magazine's current issue, "Wimbledon needs to be greener, to have more mid-rise buildings as opposed to tower block development and better design principles" – this is the interpretation of the Wimbledon Masterplan (far from the truth) that is all most residents will read. It is dishonest and misleading. Here was a perfect opportunity for full and meaningful consultation which was (intentionally?) overlooked. The Masterplan is also full of spelling and grammar inaccuracies, duplications and inconsistencies which, taken together with a deliberate intention to mislead about building heights and the definition of the town as a Metropolitan Centre, gives residents no faith in the quality of content or context of the document nor the professionals involved in writing it. Given the dramatic impact of the proposals, the lack of adequate publicity is frankly astonishing, and **I believe this invalidates the current consultation process.**

Democracy

- 14** The company partnering with Merton Council to develop Future Merton describes itself on the Future Merton website as, *"Specialises in strategic marketing for regeneration programmes, particularly magazines, websites and events to promote big development schemes to investors, developers, consultants and end-users and to help those companies raise their profile with planning authorities, investors and clients."* There is no mention here of the electorate – the residents. I feel that the Council and the Future Merton team itself have lost sight of the purpose and function of a Local Authority's remit – to represent the electorate, not to promote redevelopment or local business against the wishes of residents. Residents have chosen to live in Wimbledon because of its character and ambience – if they'd wanted to live in Croydon, Kingston or Nine Elms (!), they would have done so. It should be abundantly clear to anyone living in the Wimbledon area that the key Planning priority should be to address the critical shortage of residential accommodation, rather than building office blocks – indeed this is what the London Plan emphasises. In fact, building office blocks will presumably bring more people into the borough from outside, and make the housing shortage even worse. There are surely other areas of Merton, London and the UK where the need for these office jobs is more severe, without the need to blight Wimbledon's town centre.

Overall, I think the documents raise massive concerns about Merton Council. The lack of publicity around the documents and the fact the documents themselves are clearly misleading would suggest that they have been captured by the business lobby and/or are pursuing some other undisclosed agenda.

Kind regards,

T [REDACTED] Schofield

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