



Dear Sir/Madam,

I am writing on behalf of the Wimbledon East Hillside Residents' Association (WEHRA) in response to LBM's Consultation on their draft Local Plan.

WEHRA represents residents living in ten roads (c.800 households) located to the north of the perimeter of the town centre. WEHRA is a formal organisation, working together for over 40 years, with the mandate to 'preserve, protect and enhance our community'.

We are a stable community consisting of family homes, the majority owner occupied, with many young families with schoolchildren, plus empty nesters and older people who have resided here for many years.

We welcome the draft Local Plan which aims to raise the standards of planning across the whole Borough. We thank you for the opportunity to comment on these proposals which will significantly impact our local environment.

General Comments:

- In responding to these proposals, we are very much aware that the Coronavirus pandemic is resulting in radical and fundamental changes in how we live, work, travel, shop and socialise which will continue to evolve for some years to come and will significantly impact the type of developments required to underpin our new future. Historical data is now inadequate to forecast future developments on. LBM needs to fully investigate the implications of the Covid pandemic so it can plan for the post-pandemic town centre. Now is the time to review and challenge the assumptions relating to the commercial development of Wimbledon town centre. For example, given the increase in homeworking, will there be enough demand for the level of office space planned.

The successive lockdown restrictions have also placed more emphasis of the type of housing required for these new lifestyles, also the need for open spaces and by far the most important, the need to address climate change.

- The pandemic has also cancelled the development of Crossrail2 for several decades at least so this Local Plan will play out before it even comes back as a possibility. This means that the growth targets for greatly increased office space/ evening and night-time economies will not be underpinned by increases in transport capacity and therefore should be scaled back. Any developments dependent on Crossrail2 should be removed from the plan including safeguarding areas which will hold back progress in the town for no substantive reason.
- Many of the statements/proposals made within the draft Local Plan are not substantiated with defined standards or action plans. We propose that the whole Local Plan should assign clearly defined planning and building targets to all developments and redevelopments which can be strictly monitored and any shortfalls then identified and remedied.
- The draft Local Plan does not mention Neighbourhood Planning, a section on this should be added detailing how LBM plans to work with any future Neighbourhood Groups / Fora in the development of Neighbourhood Plans.

Specific Comments:

Section 3: URBAN DEVELOPMENT OBJECTIVES AND GOOD GROTH STRATEGIES

Question 1: Over the plan period, WEHRA believes that addressing climate change is more important than growth. Whilst we support growth this should adhere strictly to an overarching policy addressing climate change.

We propose that the urban development objective should be reordered to:

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.

Section 4: NEIGHBOURHOODS

Wimbledon: Policy N3.6

Question 13: More needs to be done if Wimbledon is to continue to be a thriving destination for businesses, local residents and visitors. Conserving local character is a priority, as well as 'greening' the town centre – the latest attempt at this outside Wimbledon theatre is woefully inadequate. If this is not addressed Wimbledon Town Centre will increasingly become an 'urban jungle' with tall building canyons which will impinge on the overall safety of residents, businesses and visitors thus making it a much less attractive place and, therefore, less valuable to all.

Question 14: Additional Comments

- **Promoting a vibrant day/night economy** is only acceptable to an extent which protects, as a matter of policy, the safety of the streets and the quality of life of the residents nearby and a character in Wimbledon that is attractive to all users.
- **Hotel development:** It is debateable whether more hotel space is needed in Wimbledon. If it is, then the requirement is more for upmarket developments
- **Building height:** Proposed building heights of 44 metres are proposed. Local people have repeatedly said they wish **buildings to be limited in height to 22m maximum** to respect local character and heritage. If buildings are to grow in height then they will need more surrounding open space rather than the much more dense and tall buildings which are currently proposed
- **Concert Hall:** We think there should be a commitment to a new centre for performing and creative arts – the building of which has been promised for years and would now bring a huge new dynamism to the Town Centre.
- **Future location of tram stop:** The tram stop terminus should continue to be located inside the station.

Question 14 continued: Specific SITE ALLOCATIONS in Wimbledon Town Centre:

The proposals for all the sites are vague and require far more definition:

Wi 2 Broadway car park, adjoining the theatre: The Council owns this site and could enhance the area and its character by developing the site primarily for community use.

Wi 5 Hartfield Road Car Park (Council owned): The proposal says development could include taller buildings with a wide variety of uses. As owner, the Council can take the opportunity to create the much-promised centre for the performing and creative arts that would be of great significance to the local area and the whole of London.

Wi 6 Highlands House, 165 The Broadway and Wi 10 Prospect House, St George's Road: Heights should be restricted to a maximum of 22m or 6/7 storeys.

Wi 9 8 St Georges Road (Community Centre site): Council ownership means community interests can and should be prioritised. Here again, building height should be limited to 22m.

Wi 11 Victoria Crescent, including Piazza: The Plan should protect the Broadway frontage Conservation Area and the public highway through the piazza. The Piazza should be subject to significant greening and seating areas.

Wi 16 Centre Court Shopping Centre: It is essential that the Council protects conservation areas along Queens Road & The Broadway. Building height should be limited to 22m as the public has repeatedly said, not 44m. Centre Court would benefit from some renovation/refurbishment without demolition or any increase in scale.

Section 6: PLACES AND SPACES IN A GROWING BOROUGH

Questions 29-30 D5.1 More detail and rigour are needed to explain 'high quality' and facilitate enforcement. Policy needs to be more positive on enhancing conservation areas and other heritage assets.

Questions 31-32 D5.2 The policy needs explicit targets and standards and to emphasise the protection of privacy and daylight/sunlight against potentially intrusive development.

Questions 37-38 D5.5 Managing heritage assets. More needs to be done on this policy. The draft plan mentions here 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.

Questions 41-42 D5.7. Digital infrastructure. More needs to be done on this policy. The plan should recognise that there are likely to be many places that are particularly sensitive to the impact of telecommunications equipment and these should be all be included in the Plan

Section 9: ECONOMY

Question 67 Policy EC7.1 Promoting economic growth and successful high streets: More needs to be done on this policy. Job creation is important, but it must be seen as part of a balance of goals that include tackling climate change and creating an environment where people will enjoy living and working.

Question 68 The plan should recognise that the aim should be not just to generate trips to Wimbledon, but to make Wimbledon town centre a great place for the people who already live and work there.

Question 83 TC7.9 Culture, arts and tourism development 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.

Question 84 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 10: BLUE AND GREEN INFRASTRUCTURE

Questions 85-106 Any policies devised should include protecting back and front garden land, a major tree-planting programme and an effective policy for maintaining and protecting trees. In terms of water, restrictions should be introduced on the scale of basement and swimming pool developments given the high water table and local topography, conversely policies also need to be put in place to maintain/improve the already stretched mains water supplies if overall demand rises due to increased development.

Section 12: CLIMATE CHANGE:

Questions 118 to 131 There could be more details on flooding and water shortage, subsidence and overheating.

In the town centre, the plan's emphasis on retrofitting existing buildings & improving energy performance and on re-using building materials is welcomed, unfortunately it is not well supported by current practice in encouraging big new office blocks in the town centre. There should be significant financial penalties for developers who harm biodiversity