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Dear Sirs

Local Plan 2020 Stage 2 Consultation

The Society is grateful for the consultation on the new local plan (the Plan) and presents its comments below. We have already commented in the previous round of consultation (October 2017 – January 2018) and our views expressed then still stand.

Unfortunately, we have not the resources to review the Plan in the detail that we normally would. The extent of the Plan and the need to review the Wimbledon Town Centre Masterplan with the same consultation end-date have made this impossible. To some extent, we are therefore compelled to reserve our position regarding the Plan.

Wimbledon Town Centre

We are aware of the on-going consultation regarding the Wimbledon Town Centre Masterplan and have commented as part of that consultation. Our vision for the future of Wimbledon Town Centre - Vision 2040 Proposals for Wimbledon Town Centre (Vision 2040) - has been submitted as part of that consultation and we would like it to be taken into account as part of the consultation for this New Local Plan.

The Council's approach to planning the future of Wimbledon Town Centre appears to be to maximise commercial growth and returns for developers. We do not object to appropriate and sustainable economic growth in our town centre: it is necessary for the prosperity of us all. However, the attractive nature of our town centre must not be compromised. This is not just for the benefit of residents – it is the attractive nature of the town that supports the economy. To be economically successful people must be drawn here to work, take leisure and particularly to live – this is after all primarily a residential town.

We note that few specific details are given of building heights and intended increases in commercial floor space in the Plan. Para 3.6.7 of the plan indicates 'modest increase in [building] heights'. This requires greater clarity: if this means the heights proposed in the Masterplan then we would not consider these increases 'modest'. Our approach is to limit building heights to a maximum of 22 metres and less in some areas (see page 27 of Vision 2040).

Specific Sites

The Plan identifies a number of key development sites within Wimbledon. These sites are discussed and each is presented with a number of options for their future use and development. While we do understand the need for further consultation regarding these sites, we believe that the Plan should provide greater clarity on the Council's intentions regarding these sites.

We have provided our vision for three sites in our document 'Vision 2040 Proposals for Wimbledon Town Centre'. The section on this is provided as an addendum to this letter. The three sites involved are:

Site Wi2 – Broadway Car Park. This site is currently owned by the Council: we believe that, it would be financially beneficial for the Council to retain the freehold for the site and that it would also provide a level of influence of its use.

Site Wi5 – Hartfield Road Car Park. We believe that this site should be developed as a concert hall. We understand that discussions for this are underway and are surprised that this potentially excellent use of the site is not even mentioned in the Plan. We also believe that retention of parking on this site is essential to the vitality of the town centre.

Site Wi11 – Victoria Crescent. Our Vision 2040 (p. 42) document sets out our intentions for this site, Retention of the characteristic shape of the Piazza, and a covered approach to the concert hall on Site Wi5 would be a fine addition to our town Centre.

Other Sites

There are of course other sites within Wimbledon. Our Vision 2040 document sets out parameters, such as height and design parameters that we believe the Plan should follow.

We note that several sites are contiguous in the St. Georges Road / Worple Road area (Wi9, Wi10, Wi13 and Wi14). We are pleased that the site descriptions acknowledge the opportunity for a co-ordinated approach to design and delivery of developments on these sites. In particular, it we would expect shared vehicle and pedestrian access.

Site Wi4 – Hartfield Road. The rear of this site overlooks a residential area, so it is essential that the rear of the building is limited in height. Buildings should also be set back from the edge of the site to provide flexibility for road design in this area.

(As an observation we note that the site numbers on the map included in this chapter do not correspond with the site descriptions that follow.)

Design

We would like to make the following observations regarding sections in this chapter of the Plan.

D5.3 i. This section should include reference to the protection of building lines. Gaps between buildings both at ground level and higher should also be protected where they provide the street with space, light and views to green areas to the rear of buildings.

D5.3 ii. We would suggest the insertion of 'urban design' in this paragraph to read 'Use appropriate architectural and *urban design* forms....' to bring out the need to give a coherent design to the town not just the individual building.

D5.3 v. This section needs to take into account the fact that gardens are not the only areas surrounding buildings that need protection. We would propose changing the wording to '...to proposed and adjoining buildings, gardens and lands.'

D5.3 ix. It is quite common for planning proposals to be accepted on the basis that trees are replaced, often by trees elsewhere. To ensure that replacement is adequate and that mature trees are not replaced by a similar number of small trees with detriment to the landscape we propose that replacement should be on the basis of tree years. (That is, for example, if a 50 year old tree is to be replaced by 5 year old trees, at least 10 would be required).

D5.10 iii. Excavation under listed buildings should not be permitted. The qualification 'that could affect the integrity of the building' should not be included in this paragraph – it allows too much latitude for developers to justify their proposals.

Suggested new policies. We believe that new policies are required:

-) To preserve whole buildings and not just facades when buildings are renovated. The interior of buildings is an integral part of their value and character. The rear of buildings should not be allowed to become out of step with their frontages.
-) A policy should be included to ensure that buildings should be adaptable in the light of changing use or requirements. Ceiling heights and floor loadings are particularly important in this regard. This will often enable buildings to be adapted rather than demolished and rebuilt which is obviously more sustainable and less disruptive.

Yours faithfully

Chris Goodair
Chairman, Wimbledon Society Planning and Environment Committee

Please send all correspondence by email to chairmanpc@wimbledonsociety.org.uk

Addendum

**Extract from Vision 2040 Proposals for Wimbledon Town Centre
Regarding specific sites in Wimbledon**

PIAZZA

- A Retain existing Piazza shape and character and height: being now a valued 'character' space in the Town and Conservation Area: The Broadway to be a fully pedestrianised area
- B Retain a public highway route (now Victoria Crescent) through between Piazza and Hartfield Road
- C Retain existing building height along The Broadway, being a Conservation Area
- D Active (maximum 7m wide) frontages along Piazza, Victoria Crescent, Broadway, whole eastern side: consider colonnades along Broadway frontage, and facing the Concert Hall, for pedestrian interest and weather protection: consider lining' the large blank facades of bigger units with small specialist units for interest (ie not to repeat the existing dreary frontages of a long supermarket)
- E Selective setting back/road widening if required to operate the probable 3 lane Hartfield Road
- F New covered and high glazed internal mall/atrium between new buildings, used as a market, and for events, and leading the pedestrian directly to the iconic Concert Hall and the new plaza G
- G Pedestrian Plaza facing the new Concert Hall, a major sitting out and tourist area
- H Note strategic cycle (and public pedestrian) route passes through from Broadway to Herbert Road
- J Provide public car parking for c200 spaces approached from Hartfield Road: headroom to be 3.5m minimum and designed to allow future conversion to other uses as needs change:
- K The elevation facing towards the future iconic Concert Hall needs to be suitably imaginative
- L Whole development to be energy neutral and a major component of the town's CHP scheme



P3 SITE: THE NEW CONCERT HALL

Owned by the Council, this is a site with very high (likely to be National as well as London-wide) potential as a major Concert Hall, and being an iconic architectural project, unique in the UK. It could add immeasurably to the range of 'offer' of the town centre, and to the current 'brand' which is fixated to a large extent on the tennis name.

From the notes above, the main public approach to the Concert Hall is to be from the northwest, ie via the Piazza and the potential internal mall/atrium and the attendant pedestrian Plaza. Such a view towards the Concert Hall could be very dramatic, with the space around the Concert Hall entrance interacting with the space G. Another potential 'pocket park'.

Car parking for patrons is needed, in order to protect local residential streets: as with note J above, it should have high headroom (at least 3.5m) and be designed specifically to be converted to other uses in the years ahead, as needs change. Is the Museum of Music History a potential occupant? Local community-related arts and educational activities need to be integral to the whole concept.

L Development to be energy neutral and a major component in the town's CHP scheme

P4 SITE BESIDE THE THEATRE

Owned by the Council, this is a site beside the Statutorily Listed and Council-owned Theatre. It currently provides car parking for this part of the town centre, and supports the users of both the Theatre and the Polka. Any disposal should be on the basis of a lease, with the Council retaining the freehold. This ensures that the Council is able to both gain financially from rents enhancements in the future (including from eventual redevelopment), it also gives the Council leverage in how the building is being used. Disposal of the lease via a formalised developer/architect competition, working to a common defined urban design framework, is the suggested method.

- A The ground floor frontage of the adjoining Theatre is poorly designed and of little interest: the new building's elevation needs to compensate for this, perhaps a colonnade, smaller units
- B The junction with the Theatre corner needs care: a negative set-back detail?
- C Height of the building should not be above the current Theatre coping: the current roof plant is ugly in the long views from the east, and shielding this should be an aim
- D Provide car parking for c100 spaces, approached from side roads; headroom to be 3.5m minimum, and designed to allow future conversion to other uses as future needs change
- E Set back elevation beside Palmerston Road to match building line: tree planting in frontage
- F Establish whether additional facilities are required for the proper future operation of the Theatre, either servicing or access or additional floorspace, potentially additional access at upper floors
- G Ground floor to be for cultural and café uses: any residential uses to be suitably insulated from performance noise Set back building to safeguard privacy to adjoining properties
- H Set back building to respect privacy of adjoining sites
- J Development to be energy neutral, and a major component of the town's CHP scheme

