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Dear Michèle,

**CROSSRAIL 2 CONSULTATION
MERTON COUNCIL'S CROSS-PARTY RESPONSE**

Further to our meetings in October 2015, we are writing to provide Merton Council's formal cross-party response to the latest Crossrail 2 consultation. (October 2015 – January 2016).

As you will be aware from the various public meetings you and your team have attended in Merton, the proposals set out in your consultation have generated a considerable number of concerns amongst land-owners, investors, residents and business in the borough.

Merton Council continues to support the strategic case for Crossrail 2 and recognises the benefits the project will provide to the growth of London and Merton. Crossrail 2 is an essential piece of infrastructure for the future prosperity of our city. However, our support for Crossrail 2 is not at any cost and the council has significant reservations about the proposals in Merton and crucially, the potential impact during construction, particularly in Wimbledon.

The proposals as set out in the latest consultation represent an unacceptable level of upheaval and disruption to our business community and one where we cannot think of any current UK, European or global comparisons for where so much of a major town centre is lost to make way for new infrastructure. We understand that the consultation scheme is an early concept design, however the current plans place Wimbledon town centre in a uniquely vulnerable position. If the plans remain as they are, we would be forced to reconsider our support for the project.

The strategic case for Crossrail 2

Merton Council is already taking a strategic lead in planning for Crossrail 2 and encouraging economic growth in Wimbledon through our 2013 Future Wimbledon Conference and the 2014 Future Wimbledon Ideas Competition. The ideas competition was run in partnership with the Design Council, NLA and Love Wimbledon BID to explore how Crossrail 2 would be a catalyst for growth and design excellence in Wimbledon.

Future Wimbledon attracted over 100 international entries and sets the tone for the council's forthcoming masterplan for Wimbledon, central to which is the integration of a new station quarter into the urban grain of Wimbledon town centre.

The council has a number of roles relating to Crossrail 2, including;

- Place shaper
- Enabler, in terms of plan making and engaging with our communities
- Planning authority
- Highway authority
- Land owner, both in central Wimbledon and Weir Road.

Merton Council, in partnership with Love Wimbledon Business Improvement District will embark on a masterplanning process in mid-2016 to establish a long term vision for Wimbledon and to identify opportunities for economic growth and enhancement to Wimbledon's public realm. The masterplan process will also need to address how proposals for Wimbledon Station integrate with the town centre and we encourage TfL and Crossrail 2 to be part of that process with our businesses and residents.

We believe Wimbledon could be a stronger player in the London economy, capitalising on its global brand recognition, excellent transport connections, lifestyle & quality of life offer and is indeed already home to a number of blue chip companies and international headquarters.

Crossrail 2 not only provides future transport capacity and wider connectivity for Merton's businesses and residents, it is also a substantial catalyst for economic growth, particularly in central Wimbledon.

Wimbledon is already the UK's only transport hub to have all modes of transport in one place (Rail, Underground, Tram, Bus, Taxi and Cycle facilities) Crossrail 2 significantly enhances this offer and provides the much needed opportunity to reconfigure the already over-crowded and out-dated facilities at Wimbledon Station.

Crossrail 2 will undoubtedly increase the transport connectivity from Merton to London and the south-west sub-region. Better trains, higher frequencies and significant investment in stations and the public realm are all clear benefits that Merton supports. We also believe that Crossrail 2 has the potential to unlock Wimbledon as an enhanced business district; with our global brand, Wimbledon could be south London's premier choice as business location.

The council's analysis on growth capacity could see a doubling of Wimbledon's commercial floor space by 2030. It is the council's intention to grow its economic base in Wimbledon to further strengthen its role as our main town centre, with a rich mix of office, retail, hotel, conferencing and leisure offerings, whilst of course, also maintaining its unique character and heritage.

The economic impact of our commercially focussed growth in Merton will add to Crossrail 2's business case and opens up scope for Wimbledon's status in the London Plan to be elevated from Major Centre to Metropolitan Centre or alternatively, be considered an Opportunity Area (when combined with our housing-led regeneration areas in Morden Housing Zone and South Wimbledon & Colliers Wood Area for Intensification).

Merton's regeneration strategy is to intensify housing and promote growth in the Northern Line corridor in Morden, South Wimbledon and Colliers Wood. A Crossrail 2 interchange at Tooting Broadway greatly enhances accessibility to Merton's planned regeneration areas.

St Georges Hospital is also a major trip generator in the wider community. St George's is one of the UK's largest teaching hospitals and the major trauma centre for the whole of south west London and Surrey covering a population of around 2.6 million - and would benefit not only from improved connectivity of a Tooting Broadway Crossrail 2 station but also the opportunity to deliver step-free access for staff, patients and visitors. For these reasons; Merton Council strongly supports the Crossrail 2 interchange at Tooting Broadway over the Balham option.

Broadly, we support the key objective of Crossrail 2 unlocking residential development at the regional level, where there are obvious opportunities for much-needed housing. However, for Wimbledon, we are concerned that the focus on housing alone will lead to the creation of a dormitory suburb, dominated by one-way commuting to Central London; which is diametrically opposed to the polycentric city model which the London Plan has sought to achieve over the past 15 years; championed also by the Outer London Commission which advocates greater roles for outer London town centres.

Merton Council is absolutely clear that the focus of new development and regeneration in Wimbledon should be commercial led – addressing an existing shortage of work-spaces and unmet demand for more retail, leisure and cultural destinations in Wimbledon. It is also important that the quality of life for residents is enhanced as a result of Crossrail 2 and the accompanying development of Wimbledon town centre. The needs of both current and future residents must be met through, for example, improved station access, reduced congestion and the preservation of the best of the town's existing heritage and character.

Whilst the longer term opportunities of Crossrail 2 are undoubtedly positive and could bring about much progressive change to Merton; there are a significant number of short and medium term challenges that we now need to plan for in collaboration with your team and others in TfL, the Mayor of London's office and our business and residential communities.

Crossrail 2 Consultation process

Merton Council expressed concerns in October 2015 that a public consultation consisting of a single option for Wimbledon Station was flawed and not a genuine consultation. There was little information in the public domain regarding alternative route options through Wimbledon or alternative station configurations including deep level tunnels. I appreciate the considerable resource your team has since put in place to work with Merton Council officers to understand the range of station and track options looked at by TfL and to help gain a greater understanding of the rationale behind why these options were not progressed. It is disappointing that alternative scenarios were not presented in the public consultation as genuine alternatives to the proposed single option, but we are encouraged by your commitment to work with Merton to revisit and understand these options as the concept design progresses into 2016.

The council also questions the Crossrail 2 stance of seeking to acquire commercial properties only, rather than considering alternatives that may provide a more satisfactory station design. The socio-economic impact of this stance in Wimbledon is unprecedented and we remain to be convinced that Wimbledon could remain a vibrant town centre with the scale of loss of commercial floor space in the identified Crossrail 2 work-sites.

Given that residents have already expressed considerable concern about the potential loss of residential property, we would encourage Crossrail 2 to minimise third-party land-take as far as possible and to plan accordingly. We would also push for the Crossrail 2 team to consider creative station design such as over-line decking in order to retain commercial space whilst works are underway.

The identification of non-safeguarded work-sites has generated a substantial degree of commercial uncertainty to businesses and land-owners which has already dented market confidence and delayed investment decisions in Wimbledon town centre and is also causing legitimate concern over the future of businesses in Weir Road. The paucity of information available to land-owners during the consultation is unsatisfactory and the council hopes that moving forward, the Crossrail 2 team will engage much earlier with land-owners 1:1 in a more meaningful dialogue.

Consequences for Merton

The proposed option for Wimbledon Station includes a cut-and-cover station box for Crossrail 2, requiring the demolition of Centre Court shopping centre and Wimbledon Bridge House. This presents a double dis-benefit as not only would Wimbledon lose the majority of its retail offer for up to a decade, the scheme wouldn't provide any substantial improvements to the existing Wimbledon Station.

We have serious doubts as to whether a town centre could recover from the proposed downtime in retail offer, given the retail investment going on in competing town centres. The council wants Wimbledon to grow, not contract and we have increasing feedback from land-owners and businesses that there is much more demand for business space than is presently available in Wimbledon.

Wimbledon Town Centre is Merton's economic engine, with over half of the borough's jobs and around 80% of the borough's comparison retailing jobs. The impact of Crossrail 2's construction on Wimbledon and Weir Road could lead to the loss or displacement of between 3000-5000 jobs. We need more detail on phasing and decanting of valuable employment spaces to fully understand the impact of constructing Crossrail 2.

The loss of associated business rates is a critical concern of the council, at a time when the government are promoting greater retention of local business rates. The scale of potential loss in Merton during construction will be detrimental to the council's medium term financial strategy. Merton Council will push strongly for appropriate financial compensation for any loss in revenues during construction in order to maintain our council services. Any loss of income to the council needs to be factored into the Crossrail 2 business case.

Merton Council will be seeking a commitment that Crossrail 2's construction would not de-value Merton's employment base or lead to a significant loss of jobs and vitality in Wimbledon town centre. We will seek financial assistance to maintain a truly viable town centre during construction.

Merton Council has continued to invest in economic development activities throughout the recession which has led to a decline in the borough's commercial vacancy rates. Our industrial stock is fully let and our retail vacancies are consistently below the London average, with Wimbledon town centre having only 1.7% retail vacancies and 8% office vacancies. There is unmet demand for commercial premises in Merton and we are one of the only southwest London boroughs experiencing economic growth and we have recently been recognised by the Federation of Small Businesses and London Councils as London's most small-business friendly borough.

The current Crossrail 2 proposals completely undermine the borough's recent successes and pose a threat to our ambitious growth plans for Wimbledon town centre. We are a pro-growth, pro-development borough; but only if the design quality is of the highest standard and if proposals fit well with the ambition of the council and our residents. The consultation proposals have a long way to go to achieve this.

The council has previously highlighted the serious lack of any socio-economic analysis of the impact of the consultation proposals on our local economy in terms of the construction phase and the timescale for which work-sites may be required. This information is now critical to inform land owners and investors of key decisions over the next decade. There is also little indication of how any phasing or de-canting may be managed as well as by whom, TfL or LBM?

Supporting infrastructure to unlock growth.

Lessons learned from Crossrail 1 recognise that major infrastructure investment is a catalyst for growth and intensification around stations. We are also more aware of the potential for over-site developments and ensuring that infrastructure is proactively planned in such a way to future-proof sites for future development opportunity.

Crossrail 1 has also demonstrated how successfully large engineering works can be undertaken with minimal disruption to business, commuters and residents alike. As well as the loss of shops and businesses, residents have already raised worries about, for example, construction vehicle movements, the length of building works and traffic gyratory congestion during construction and so we would like to see the same measures put in place for Crossrail 2 as have worked well in the City and Bond Street, the latter of which of course includes a similar mix of business premises and residential homes.

Over-station (OS) and over-track (OT) developments in Wimbledon have long been part of Merton's local plan, as far back as the 2003 Unitary Development Plan and featured heavily in the 2014 Future Wimbledon competition responses. We believe the following supporting infrastructure is critical to minimise the construction impact of the project and also provides opportunity for new development up-front to re-accommodate businesses prior to any demolition of current facilities (if deemed necessary at all depending on future options pursued), thus sustaining Wimbledon's vitality.

Merton's infrastructure asks;

1. Wimbledon North Bridge: connecting Alexandra Road and Queens Road (subject to consultation with residents and minimisation of the loss of residential properties)
2. Revisions to Wimbledon traffic flows including traffic modelling and a revitalised public realm to be explored through a masterplanning process. This will allow us to fully understand the impact and deliverability of new bridges or decking structures as a potential solution to Wimbledon's through-traffic problems.
3. Wimbledon Station OS & OT decking adjacent to and north of Centre Court. This is a pre-requisite development opportunity to provide decant commercial provision and should connect with the North Bridge proposal (1)

4. Wimbledon Bridge House (southern deck). Whilst Crossrail 2 proposals indicate a new tram viaduct, the council believes this should be a fully decked structure above the railway to provide an integrated tram interchange and world class public realm flanked by new commercial development. This proposal should also open up access to Dundonald Yards as a longer term development opportunity.
5. Long term solutions are sought for Lower Downs tunnel in Raynes Park, which is frequently struck and blocked by vehicles and is an ongoing problem for Network Rail and Merton.
6. Long term solutions are sought for Durnsford Road bridge which is narrow, challenging for pedestrians and cyclists and would require upgrading to support any redevelopment or intensification of Weir Road industrial area.
7. More detailed work, including traffic modelling is required on options for West Barnes and Motspur Park level crossings to mitigate any further severance caused by the railway in these communities. The crossings provide vital access to many local schools and the Burlington Road / Shanon Corner business area. The crossings are also vital to our local shopping parades. Local residents and businesses are rightly concerned at the traffic impact of additional trains using the crossings and the prospect of crossing closures. Full exploration of bridge and underpass options are vital to the prosperity of the community.
8. Further design detail is required to allow us to fully understand the implications of additional tracks in the Raynes Park area. Proposals to date for the line south of Wimbledon have been less well developed.

Placemaking and Growth

Again, learning from Crossrail 1, the project is a momentous opportunity to provide for economic growth, transform our public transport provision and to re-think Wimbledon town centre's traffic system to create a place for people. Crossrail 2 could significantly contribute to Wimbledon's success through a holistic and seamless integration of a major transport hub and urban centre.

However, there are barriers to the delivery of great placemaking, for which the council will seek resources from TfL and the Mayor to ensure that Wimbledon station and town centre developments are of the best design possible and that Merton maximises the benefits of Crossrail 2 whilst ensuring that disruption is kept to a minimum.

Barriers to unlocking our growth potential:

1. Wimbledon gyratory & traffic flow – a new solution is required, aligned to the emerging masterplan and enabling infrastructure listed above.
2. Dundonald yards – a phased release of the Network Rail site will create a new mixed use neighbourhood for Wimbledon
3. Clarity sought over the best solution for Weir Road, including any decant offer for business, compensation for lost business rate income, support to help businesses relocate and compensation to LBM as freeholder.
4. Clarity sought on the future of the Rainbow Yards development in Raynes Park
5. Funding towards masterplanning and development management to enable Merton Council to lead and shape plans to maximise the growth potential of the borough

6. Commitment to working with the GLA to progress swiftly, revisions to the London Plan for Wimbledon Metropolitan Centre or Opportunity Area (including Planning Frameworks) and to proactively plan for any phased release of industrial land and adequate provision of community infrastructure.

In conclusion, we appreciate that this is the first of many consultations on Crossrail 2 and that the scheme design is at a concept stage. However, at such an early stage, it is clear that the proposals have such significant and unparalleled consequence for the economic sustainability of Merton, notably in Wimbledon Town Centre.

Whilst we can all recognise the long term benefits of Crossrail 2 to London and Merton, we remain unconvinced of the design solution thus far for Wimbledon Station and believe that the real growth opportunities for Wimbledon have not fully been exploited (e.g., over-rail developments). We are also fundamentally opposed to any residential led regeneration in central Wimbledon which must be also allowed to flourish as a place of work and culture.

There are considerable issues to overcome, not least that the current consultation only considers one option. We require a thorough, critical analysis of other options for Wimbledon Station, but we are in the early days of planning. I appreciate the commitment of your team to work with Merton officers to fully integrate any Crossrail 2 proposals with the council's emerging masterplan for Wimbledon.

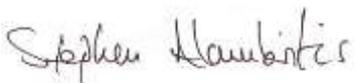
We trust this provides you and your team with the opportunity to revise the proposals in a way that moves away from engineering and respects the grain and character of Wimbledon as a place, to significantly reduce the impact of construction on our residential and business communities.

We all look forward to reviewing the next iteration of Crossrail 2 proposals in tandem with the council's masterplan; and to be in a position to strongly support Crossrail 2 which is vital to London's economy and transport infrastructure.

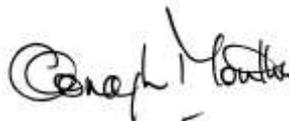
Yours sincerely,



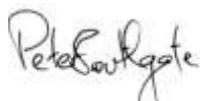
Councillor Andrew Judge
Cabinet Member for Regeneration & Environmental Sustainability



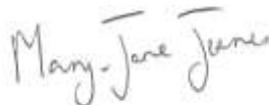
Councillor Stephen Alambritis
Leader of Merton Council



Councillor Oonagh Moulton
Leader of Merton Conservatives



Councillor Peter Southgate
Leader of Merton Park Independent Residents



Councillor Mary Jane Jeanes
West Barnes Ward Liberal Democrat Councillor