

**From: Mays. J
Chairman
Wimbledon Society Planning Committee**

To: LDF

WIMBLEDON SOCIETY CONSULTATION RESPONSES TO THE COUNCIL
DRAFT SITES & POLICIES DEVELOPMENT PLAN DOCUMENT
AND DRAFT PROPOSALS MAP
3rd August 2012

PART 1: ADDITIONAL DETAILED PLANNING POLICIES

DM.H3 Affordable housing provision, rental levels:

Para 3: Omit “but no higher unless agreed as an exception”.

Adding this phrase, which encourages endless prevarication and discussion between developer and Council, is unhelpful, and waters down the clarity which should underpin all Plan policies.

This is a criticism that could be taken up through the whole Plan document, and applicants and public need to be clear what the thrust of any Plan policy is.

DM.H4 Sustainable development standards:

a & b & c: The Society supports the principle of requiring higher standards for replacement houses, but, given that new housing is going to be required to meet Code level 6 in 2016, and the closeness of the Plan to this date, it is unrealistic to specify that replacement houses should now only have to comply with Code 5 level: the Merton Rule approach has been seminal in recent years: Code 6 should therefore be specified.

It is clear from independent and continuing technical studies that the estimated additional cost of achieving Code 6 level in an individually designed detached modern house is around some £30k. The cost is reducing as experience is gained, and some equipment manufactures are claiming lower figures. When (for example) the new houses in the Firs development off Copse Hill are to be sold for between £2.5 and £4m, it seems bizarre that they were only required to incorporate Code 4 design concepts.

As has already been demonstrated in built schemes elsewhere, achievement of Code 6 is practicable in various types of new house, including social housing.

DM.EP4 This proposal to allow developers to avoid designing new buildings that properly comply with a Code level and BREEAM standards should not be accepted.

It is highly likely that such an option will be used by developers to justify inefficient development and sustainability performance in new buildings.

And there will then be time consuming and expensive “negotiations” with the Council officers, reports to and from a technical group, all probably resulting in an overall financial saving to developers and poor performing buildings.

Council Plan policy should instead say clearly that the aim must be for all new development to be built to proper modern standards, and offsetting should not be an option.

This policy should then establish the primacy of the local Plan over any other scheme, whether nationally promoted or not.

Instead of (see (a)) relying on a “Working Group” giving their value judgments on schemes, the Plan should instead set out strict technical criteria that need to be complied with. The legacy of the Merton Rule should not be fudged.

1.11 The proposal that an inefficient modern development should be allowed if it subsidizes developments elsewhere should not be accepted.

1.12 a: The whole concept of “additional measures” that are then added in to a design for a new building is misplaced.

Rather than “add things in” to an inherently outdated design, the whole design concept should start with the aim of creating a development that has sustainability thinking on energy/water etc at its heart.

Energy levels etc need to be integral to the original design of any building.

It is premature to devise arrangements now for coping with an AS system, the details of which are unclear, especially as planning for it runs the risk of making it more likely to come about. These arguments point to the conclusion that this Policy should not be added to the Sites and Policies DPD.

OTHER: The present draft Plan policies on school provision for example are not sufficient to explain how the Council is going to provide for the expected places. The opportunity should be taken to produce a robust set of actual proposals, not just policies, so that all can see how the education programme is to be achieved comprehensively.

A Policy on Basement applications is also needed, being a subject which has significant local impacts.

PART 2: POTENTIAL ADDITIONAL SITES FOR NEW HOUSES

Some general points need to be made, before dealing with the sites in detail. Although the market would like to see much more new housing being built (on open spaces or cheaper commercially occupied land for example) it is surely important to recognize:

(a) that the principal thrust of the Plan (given that the housing provision is being met) should be improvement to the quality of life; and public amenities; and protection of local employment and open spaces;

(b) that the present policies protecting open spaces and commercial/employment uses should be fully followed, and not compromised as they seem to be in a number of these sites; and

(c) that no new housing whatsoever should be built in areas which are vulnerable to flooding: that there is existing housing in such zones should not be used as an excuse for having more. We need to learn from past mistakes, not repeat them. And put in place technical measures and proposals to improve the flooding resilience in all vulnerable housing stock.

Additionally, quite apart from the “local” objections to housing on some sites, there is no pressing planning need to see any of them diverted to housing, particularly when policies on the protection of open spaces or employment could be compromised.

SITE PROPOSAL 37: WIMBLEDON GREYHOUND STADIUM

This is an iconic site for sport, not just locally but London-wide and nationally. The unimaginative way in which the similarly very distinctive Football ground in Plough Lane was lost, and replaced by development that failed to relate to that site’s past, should be a salutary lesson, and not repeated.

Local distinctiveness strongly suggests that a major Stadium/sports venue should be retained on the site.

Policies on the protection and promotion of sports and recreation also indicate this, as indeed should the Olympic legacy concept.

Policies on restricting retail uses to established centres should preclude retail.

Because of the limitations of its location in the flood plain, no housing would be either sensible or appropriate.

Adjoining the site there is a very significant amount of local employment floorspace, much of it in LB Wandsworth.

Accordingly, the suggested uses by the site owners, should not be accepted. The Council's preferred uses should say that the major user should be a sports stadium type venue, to preserve the sporting heritage, with additional community facilities and perhaps some employment uses.

12A RAVENSBURY TERRACE, WIMBLEDON PARK

This site, and its neighbour to the south, are significant employment sites providing excellent space for the knowledge-based and creative businesses.

Reuters for example is one of the occupiers.

Such a location, within easy reach of central London clients, good accessibility to rail, and being close to a good local centre, encourages local regeneration and housing improvements (including within LB Wandsworth).

The "warehouse" building is actually offices and studios, and is an interesting example of an early 19th century warehouse, with loading doors to the upper storeys.

It appears that this is one of the very few such buildings left along the banks of the Wandle, presumably when it was still navigable to barges coming up from the Thames.

As such this building should be immediately considered for Local Listing, and an approach made to English Heritage for statutory listing.

The river at this point makes an admirable setting, with green banks and a sitting area accessible to the local employees, all creating a very pleasant quiet & green ambience. An old stream (marked by a line of trees) running into the Wandle may lie along the northern edge of the site, but this needs to be verified.

This site (and the Haslemere site noted below) should be seen as important parts of the Wandle Regional Park linear strip.

For the reasons above, floodplain, and retaining local employment; and also because the building itself is of special historic character, demolition should not be accepted, and the use should remain as offices/studios etc. No housing use should be accepted.

The reference to the site being affected by the potential Crossrail 2 line is not understood, and if this will affect the excellent character of the river banks, and the Regional Park, then the detailing of this route needs to be rethought.

HASLEMERE INDUSTRIAL ESTATE, EARLSFIELD

This site is a neighbour to the Ravensbury Terrace site mentioned above, and provides a very significant amount of employment/commercial space close to Earlsfield centre and Station. The same points apply to this site.

For reasons of floodplain, retaining local employment, encouraging growing commercial businesses, high grade river bank character and amenity, no housing should be accepted as appropriate or desirable for this site.

Whether there is possibility of creating a riverside walk under the rail bridge could be examined.

The Council's preferred business use is favoured.

KENLEY ROAD CAR PARK, MORDEN

Being within the Morden Masterplan area, there should be no ad hoc decisions on any sizeable sites such as this until that masterplan has been produced.

This is eminently achievable as the car park site is in Council ownership.

The existing open space (Kenley Park) to the west is also Council owned, but being very narrow (it exists because of the need to protect the tunnels coming up from the underground line) it is not easily able to accommodate a wide range of activities.

It is therefore a pleasant walk, with planting, but little else.

If any of the present car park land became surplus to requirements, then rather than the suggested housing (not accepted as the site is landlocked, and there is sufficient housing in the Plan), adding this area of land to the existing Park should be considered.

This would then allow for far more activities (Tennis courts etc) to be added to the present Park's range of facilities, and make it more of a neighbourhood asset. It also resolves the issues of the site being "landlocked".

Additional access into the Park for pedestrians along existing private service roads to east and west could be examined, to improve access to the Park for local residents. The preferred use therefore should be POS, as an addition to Kenley Park.

SIBTHORP ROAD CAR PARK: FAIR GREEN: MITCHAM

The present appearance of the rear of this street block is lamentable, and contributes to the very poor quality of the local environment around Fair Green.

This is largely due to the crude road building and insensitive large scale development of recent years, and the subsequent loss of local character; the whole centre is clearly in decline and needs sensitive regeneration.

With rear elevations fully exposed to the major highway, there is a need to repair the structure of the remaining part of the street block, and form a street frontage to Holborn Way, if the Fair Green centre is to regain some of its earlier character. The short sections of London Road and Sibthorp Road still have some of this character, and formalizing the existing pedestrian links into them from this site should be a priority.

Creating a central Square within the street block would make a place of local interest, allow the existing business frontages to remain, and draw together the pedestrian routes.

Small scale business uses are needed locally, and could help to regenerate the economic activity of the Fair Green area, and these could be considered as well as some retail/café etc type uses.

Residential is not considered to be appropriate as a major user.

Enough car parking for the proper operation of the whole centre is an essential, and therefore no decision should be pre-empted for this site, until the overall Plan for Mitcham Fair Green has been produced.

WEIR ROAD/DURNSFORD ROAD CORNER

The site forms part of an extensive area of commercial and employment related land, including service industry and depots. Introducing housing into this zone would be contrary to Plan policy on protecting employment; the site is also not well served by public transport, and no housing should therefore be accepted.

The Council's preferred use of industrial/warehousing could be accepted, although the addition of some more office based accommodation could act as a stimulus to local start-up business.

WOLFSON: COPSE HILL

This site is actually somewhat larger than is shown on the consultation plan. It extends further to the west, and includes part of the Council-defined Metropolitan Open Land (MOL). Current pre-application drawings illustrate the site boundary, but do not yet correctly show the defined MOL boundary.

The description therefore should say that the site includes some MOL and a bus turnaround.

The proposed uses therefore should include not only housing but also MOL, joined to the main body of the MOL to the south and west.

And there should be a public entrance to the MOL from Copse Hi II, with a public path down to the lower level playing fields, wooded areas etc.
Should the bus turnaround cease to be used as such, it should revert to MOL.
The Council's preferred use should therefore read Residential, Public Open Space (ie MOL) and Bus turnaround.

SOUTHEY BOWLS CLUB: LOWER DOWNS ROAD

This is a site clearly defined as open space in the Council's draft Proposals Map 2012 (PO11 on maps C1 & B2). Vehicle entry is via Lower Downs Road, with a pedestrian entry to the Clubhouse & site from the path linking Kingston Road & Abbott Avenue. It is possible that if the Dundonald Road Bowls green were to be closed (noting the current proposals for the local school and open space) then the existing members of that Club would need to find another.

Introducing housing into the site would be contrary to Plan policy that protects open spaces, and should not be accepted.

However, open air Bowls clubs by definition operate during the summer months, with winter being largely given over to such social activities as can be supported by the Clubhouse etc.

Such facilities at this site appear to be very limited, and instead of adding in housing (which would be contrary to Plan policy and not improve winter facilities), consideration could be given to enhancing the present indoor accommodation to provide a wider social/recreational amenity for the locality as well as the Club members.

Introducing housing as suggested by the Council should not be accepted.

RAYNES PARK SERVICE STATION: BUSHEY ROAD

This site is in the main used by the automotive trades. It is close to Wimbledon Chase Station and easily accessible to the A3.

Being long and narrow, it is unsuited to the proposed housing use, with the need for an access road, space around the dwellings, and the need to keep any development low in height, to protect the privacy of the rear gardens of surrounding houses.

Instead, it provides an opportunity for a range of small scale commercial/studio type business uses, geared towards the knowledge-based firms. These would then be less likely to cause disturbance to the adjoining houses with noise and smell etc.

The frontage building beside Bushey Road could be higher.

Such an approach would also comply with Council Plan policy on protecting and promoting local employment.

The Council's suggested preferred use as housing should not therefore be accepted.

DRAFT PROPOSALS MAP REVISIONS

RAYNES PARK LOCAL CENTRE

The Station entrance is from the south, and this is a significant part of the operation of the whole centre: suggested that this building be retained within the new boundary. The rationale for removing the zone to the south of the rail tracks is unclear and needs to be explained.

TRAM LINE NETWORK: MITCHAM etc

Whether this is the best route for the tram should depend on whether a detailed design assessment shows it to be acceptable for pedestrian activities and local frontage uses. Failing this, an alternative alignment could be along Holborn Way.

It appears that the Tooting to Sutton link has been omitted: the rationale for this also needs to be explained.

ENDS.....

The suggested location of the route through the Fair Green area passes along one of the very few roads (London Road) that have some vestiges of the original character.