



BATTLES AREA RESIDENTS ASSOCIATION



Response to the Stage 3 Draft Merton Local Plan Consultation by Battles Area Residents Association (BARA)

We are extremely disappointed to see that very limited changes have been made to the Draft Local Plan in response to the very extensive representations submitted by BARA in response to the Stage 2a consultation.

We are particularly concerned that there is no published record of the Council's response to the comments made by BARA and other consultees which clearly sets out how these have been addressed in the amended Plan and why it has been considered inappropriate for other requested changes to be made. The submission to the Secretary of State of a statement setting out how any representations made pursuant to Regulation 18 have been taken into account is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. The publication of a full report setting out the Council's response would therefore normally be expected at the Regulation 19 stage of Local Plan preparation prior to publication and submission of the Local Plan to the Secretary of State for examination by an independent Inspector. In the absence of this, it is almost impossible to understand how our comments (and the comments of other consultees) have been addressed and where changes to the Draft Local Plan have been made.

We are also concerned that consultation on the Stage 3 Draft Local Plan should have been undertaken over the summer holiday period- a time which would normally be avoided for important consultation exercises of this nature. An extended time period should have been allowed to provide adequate opportunity to review such a large and complex document and to comment.

The pandemic has highlighted the importance of communities and neighbourhoods and the need to promote the health and wellbeing of all ages- that means good access to quality green spaces, quality homes and putting people and placemaking at the centre of decision making. As previously stated, whilst we would wish to see a thriving local economy, it is also important to ensure that development protects and enhances local character, strengthens local communities and meets the needs of existing and future residents. This has been highlighted in the updated NPPF published in July 2021 which places even greater emphasis on the importance of design quality and the need to ensure local communities are fully engaged in shaping development in their neighbourhoods. The Stage 3 Local Plan was published on 22nd July (only one day after publication of the updated NPPF) and will clearly need to be amended to reflect the new NPPF prior to examination.

Having reviewed the Stage 3 Local Plan, we are of the view that further changes are required in order for the Plan to meet the tests of soundness and reiterate below our previous comments on the relevant sections and policies which have not to date been addressed in the amendments made.

We would also confirm that BARA would wish to attend the relevant examination hearings and to be kept informed of the arrangements for these.

Good Growth Strategy

We broadly agree with the Good Growth Strategy but believe that in promoting development, greater emphasis needs to be placed on protecting and enhancing neighbourhood character. We accept that it is necessary to make the best use of land and buildings but are concerned that the focus on densification may impact on the character and quality of existing neighbourhoods and residential amenity unless carefully managed.

The plan states that neighbourhoods such as South Wimbledon will 'generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting'. This needs to be qualified. Higher densities must not be taken as a 'given' and in bringing forward development proposals, an appropriate density must be established through the adoption of a design led approach which takes full account of local character and context. This is consistent with Policy D3 of the Publication London Plan (December 2020) which makes it clear that optimising site capacity means ensuring that development is of the most appropriate form and land use for the site and responds to its context and infrastructure capacity.

Particular care also needs to be taken in identifying locations suitable for tall buildings. In accordance with the Secretary of State's Direction on the London Plan in December 2020, tall buildings should only be brought forward in appropriate and clearly defined areas whilst still enabling *gentle* density across London.

We support the promotion of healthy and active neighbourhoods with a range of activities including access to quality green space and leisure facilities and the concept of the 20 minute neighbourhood. We believe such a neighbourhood can be created in South Wimbledon with the revitalisation of the Local Centre, enhancement of green spaces and public realm improvements.

The Key Diagram identifies the Wimbledon/Colliers Wood/South Wimbledon Opportunity Area as Merton's main growth area. It must be made explicit, however, that this is a very broad area and development opportunities are focused in particular locations. Extensive areas within the OA are not suitable for large scale development or change.

We are supportive of the key priorities for South Wimbledon set out in Chapter 01B p.20 but would wish to amend the first bullet point as follows:

- *Making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new homes (especially affordable homes) and affordable and flexible employment floor space provided that new development is respectful of local*

character and context and the necessary infrastructure is provided to meet the needs of new and existing communities.

We would also like to add an additional priority:

- *Promoting the health and wellbeing of residents through the enhancement of green spaces and improved access to recreational facilities.*

Urban Development Objectives

We are generally supportive of the Strategic Objectives set out in Chapter 01C and the focus placed on meeting the needs of Merton's communities and tackling climate change. However, we would again emphasise the need to ensure that the necessary infrastructure is provided alongside new development to meet the needs of both new *and* existing communities and that in seeking to optimise development, a design led approach is adopted which respects local character and context and engages local communities in shaping their neighbourhoods - a key objective of the updated NPPF.

Strategic Objective 5: places for people should include a commitment to ensuring that new homes include provision of adequate outdoor amenity space and to providing new and improved green spaces. This is essential in promoting wellbeing. Working with key stakeholders should include working with the local community and ensuring they are fully engaged in shaping their neighbourhood.

Spatial Vision

We are generally supportive of the Spatial Vision in particular, the focus on addressing climate change and health and income inequality. We would like to see reference to the greening of Merton with an extended network of new and improved green spaces accessible to all and rich in biodiversity, respectful, high quality design and distinctive neighbourhoods.

We note there is no Chapter 2- has this been omitted in error?

Neighbourhoods: South Wimbledon

We welcome that the Council has taken into account our previous representations and the Plan now recognises South Wimbledon as a distinctive neighbourhood. We also note the statement that the Council '*supports developments that enhance the local environment*' and we would strongly endorse this.

We would however wish to make the following comments on Policy N3.5 and the supporting text.

Boundary of South Wimbledon

We are pleased to see the boundary of South Wimbledon has been amended and extended to better reflect the character and homogeneity of the area. However, whilst the revised boundary now includes Wycliffe Road, Ridley Road and Latimer Road, it cuts through the centre of Haydons Road Recreation Ground and excludes the eastern part of Quicks Road and the full area covered by the Battles Area Residents Association. This is illogical- particularly the exclusion of half of the recreation ground which is such an important facility and serves the whole of South Wimbledon.

We would request that the boundary of South Wimbledon is further amended as shown in red on the following plan extract.



Figure 1: Proposed revised boundary to South Wimbledon

Key Objectives

We are generally supportive of the objectives for South Wimbledon, however we would like to propose amendments to these as follows:

- Add to Improving public realm and public space- *‘enhancing the community and biodiversity value of green spaces’*
- Add additional objective- ***Enhancing local character and heritage: Promote new development which respects and enhances local character and opportunities to celebrate the area’s unique local heritage***

Character: South Wimbledon

We do not consider the selected photos adequately reflect the heritage and character of South Wimbledon. The CGI of High Path represents future development and does not reflect the existing character. We would like to see some further images of the Local Centre and green spaces.

South Wimbledon: Policy N7.1 (previously Policy N3.5)

We are disappointed that no amendments have been made to this Policy in response to our previous representations and we would again request consideration is given to the following amendments. In particular, reference should be included to Haydons Road Recreation Ground given that it has now been recognised by the Local Planning Authority as being within the boundary of South Wimbledon in the Stage 3 Local Plan. We would also suggest that the policy should make clear that South Wimbledon Station has been identified as a site allocation (Ref: Wi8).

Proposed amendments to Policy N7.1:

'Recognising South Wimbledon as a distinctive neighbourhood in its own right

We will do this by:

- a. Proposing a new and improved Local Centre at the heart of the South Wimbledon, focussed around the underground station and the junction where Morden Road, Merton Road, Kingston Road and Merton High Street meet;*
- b. Supporting shops, services and businesses commensurate with a Local Centre, particularly those that serve the day-to-day needs of local residents;*
- c. Supporting developments and occupiers that help improve or strengthen local character, reflecting the area's rich architectural history or providing a modern interpretation which respects heritage assets and local character;*
- d. Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;*
- e. Supporting measures to enhance and maintain the streetscene and public realm in South Wimbledon, ~~particularly including~~ along the main roads where most travel takes place, including the provision of waste disposal facilities to prevent street litter;*
- f. Encouraging measures that help to minimise and mitigate pollutants associated with the busy road network, including planting and green cover, measures to encourage walking and cycling and, electric vehicle charging points;*
- g. Protecting and enhancing the public open space at Nelson Gardens and Haydons Road Recreation Ground and improving links to Abbey Rec, Wandle Park and other nearby open spaces*

h. Support well designed development commensurate with the excellent public transport access of the area of a scale and form which is respectful of local character and context

i. Support improvements to the transport infrastructure that will help to reduce road congestion and improve the public realm, particularly for pedestrians and cyclists;

j. ~~Work with~~ Integrating the regeneration phases being delivered on the High Path estate over the next 10- 15 years and ensuring the development enhances the local environment, guided by the Estates Local Plan; this includes the proposed public park at High Path;

k. ~~Supporting~~ Promoting an appropriate development at South Wimbledon station (Site Allocation Wi8) which respects and enhances the Grade II listed ~~building~~ heritage asset and other local heritage assets within the area, improves the station facilities and delivers a range of benefits including a public space, cycle parking and secondary pedestrian entrance to the underground station’.

Places and Spaces in a growing borough

We support the objective of sustainable, efficient and high quality design. However, it must also be respectful of context and character and maintain and enhance local distinctiveness.

Strategic Policy LP D12.1 Delivering well designed and resilient neighbourhoods

An additional criterion should be added relating to the capacity of local infrastructure to accommodate development and the need to ensure that necessary infrastructure is provided to meet the needs of new development as they arise. This is consistent with London Plan Policy D3.

Policy D12.2 Urban design

Criterion d should be expanded to state that all proposals for new development should demonstrate how local context and character has been taken into account and how the new development will enhance local character and distinctiveness.

An additional criterion should be added to ensure that provision for future management and maintenance of public realm is secured through new developments.

Policy D12.3 Ensuring high quality design for all developments

We would like to see a stronger reference to the need to demonstrate that local context and character has been fully assessed and respected in development proposals. Given the current problems arising from waste in South Wimbledon and throughout the Borough, we welcome the reference to adequate provision of refuse facilities and the identification of a suitable locations for bins and recycling in all developments. This applies particularly when residential properties are sub-divided. When there is no or inadequate provision for waste, rubbish accumulates on the streets to the detriment of the whole environment. This has an adverse impact on the quality of neighbourhoods and results in a loss of civic pride. There is

express reference to the disposal of construction waste and we would like to see similar reference to general household and commercial waste included in this policy.

Policy D12.4 Alterations and extensions to existing buildings

An additional criterion should be added which requires new development to respect and enhance heritage assets.

Policy D12.6 Tall Buildings

We support the proposal to only permit tall buildings in Wimbledon, Colliers Wood and Morden town centres. However outside town centres, it must be acknowledged that taller buildings (up to 6 storeys) can impact on the character of an area and will also need to be carefully sited taking into account local context and good urban design principles.

Economy and Town Centres

Strategic Policy E13.1 Promoting economic growth and successful high streets

We are supportive of the objective of encouraging business investment and jobs growth, in particular the creation of successful high streets including South Wimbledon Local Centre. Changes in the Use Classes Order and the introduction of new Class E and extended Permitted Development rights need to be considered in protecting employment space and ensuring the future vitality of our high streets.

We would like to see more detail about how the Council will support the regeneration of local centres commensurate with the character of the area and providing services to local residents and to work with the Council in bringing forward proposals. Consideration needs to be given to changes in working practices due to the pandemic.

Policy E13.4 Local Employment Opportunities

With changes in working patterns, there is likely to be an increased demand for shared and affordable workspace in the local area. This is also in keeping with the concept of the 20 minute neighbourhood. We would like to see reference to support for shared and affordable workspace for new and expanding small businesses.

TC13.5 Merton's town centres and neighbourhood parades

Changes in the Use Classes Order and the introduction of new Class E and extended Permitted Development rights need to be considered in protecting employment space and ensuring the future vitality of our high streets.

TC13.9 Culture, Arts and Tourism Development

We support the principle of promoting culture and the arts and see great potential for this in South Wimbledon given its strong local heritage. The history of South Wimbledon is not widely known or appreciated and we would like to see all new developments in the South

Wimbledon area to contribute to culture and the arts and a wider programme of events and projects to celebrate local heritage. This should be referenced in the policy.

Green and Blue Infrastructure

Strategic Policy O15.1 open spaces, green infrastructure and nature conservation

We welcome the Council's commitment to the protection and enhancement of our open spaces and to working with partners to deliver sport, recreation and play facilities. The pandemic has demonstrated how valuable these are to the health and wellbeing of communities.

Policy O15.2 Open Space and Green Infrastructure

We are pleased to see the value placed on Green Infrastructure and open spaces and the contribution they make to health and wellbeing, social cohesion and mitigating climate change. We have witnessed at first hand how Haydons Road Recreation Ground has become a focus of community activity and an increasingly important facility for residents of all ages in South Wimbledon.

We welcome the policy commitment to protecting designated open spaces from inappropriate development but would like to see O15.2a extended to include protection of open space from *'inappropriate uses'*.

Previous Policy O8.5 Sport and Recreation

We are disappointed to see the omission of Policy O8.5 and the commitment to helping residents lead healthy and active lifestyles and improving mental wellbeing through sport and recreation. The policy stated that the Council will encourage opportunities for sport, recreation and play and safeguard existing sport and recreation facilities and support proposals for the refurbishment of existing recreation facilities on sites designated as open space. BARA has been campaigning to bring the existing games area at Haydons Road Recreation Ground back into community sport and recreation use and we look forward to working with the Council to achieve this shared objective for the benefit of the South Wimbledon community.

The single line added to Policy IN 14.1f to the effect that the Council will work with partners to facilitate the delivery of sport, recreation and play facilities and to encourage the shared use of sites and spaces is inadequate and we strongly advocate the reinstatement of Policy O8.5.

O15.6 Wandle Valley Regional Park

We support the objective of enhancing the Wandle Valley and maintaining it as a strategic biodiverse and accessible corridor. We would like to see the inclusion of an additional criterion to improve accessibility by foot and cycle to the Wandle Valley from adjacent neighbourhoods

Health and Wellbeing

We welcome the Council's commitment to promote more active and healthier lifestyles and to tackle the causes of ill health and health inequalities in Merton. This adds further weight to the case for improving access to sport and recreational facilities and for the refurbishment of existing facilities and the need for the reinstatement of Policy O8.5 in the Stage 2a Draft Local Plan.

Infrastructure

Policy IN14.2 Social and Community Infrastructure

We welcome the commitment to the improvement of social and community infrastructure to support existing residents and to accommodate future growth but would place greater emphasis on the requirement for necessary infrastructure to be provided at the time of need to ensure there is adequate capacity to meet the needs of new and existing residents. The policy should include reference to working with local communities to understand existing provision and future needs and priorities. This reflects the London Plan (Policy S1).

Transport and Urban Mobility

Policy T6.8 Parking, deliveries and servicing

We are supportive of the proposals to promote sustainable transport choices. However, in limiting car parking in new developments it is necessary to consider the impacts on existing communities and the limited capacity of residential streets to accommodate additional parking stress and increased levels of deliveries and servicing activities and how this can be effectively managed.

Site Allocations

We would comment as follows on the sites that directly impact South Wimbledon:

Site Wi1 Battle Close, North Road, Wimbledon SW19 1AQ

Whilst outside the BARA area, we would nonetheless like to comment on this allocation because of its wider importance to the local community. We are concerned that as currently drafted, the site allocation could allow for a purely residential development without any community uses. Given the previous leisure use of the site, we believe it is important to ensure some re-provision of leisure and community uses in any future development. As it is a council owned site, the Council has the opportunity to promote an exemplar scheme which promotes their commitment to health and wellbeing and other policy objectives in the Local Plan. We would therefore propose that the site allocation should be amended as follows:

~~‘Any of the following uses or A~~ suitable mix of community (including education), sport/leisure facilities and residential’.

Site Wi8: South Wimbledon Station

It is unclear why Site Wi8 (South Wimbledon Underground Station) has been included in Wimbledon rather than South Wimbledon and we would propose that it should be moved to the latter section of the Plan for ease of reference.

The redevelopment of this important site needs to be very carefully handled given the site constraints. We would therefore suggest that a masterplan is required to show how it would integrate with the Local centre and wider area and the site allocation be amended to reflect this. The future of this site is key to the regeneration of South Wimbledon and it must not be considered in isolation. The Council should work in collaboration with Transport for London in the preparation of the masterplan and development proposals. The local community should be fully engaged from the outset in shaping proposals and this should be referenced in the site allocation.

 Chair and the Committee

Battles Area Residents Association (BARA)

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