

LONDON BOROUGH OF MERTON LOCAL PLAN – STAGE 3 (REGULATION 19) PRE-SUBMISSION CONSULTATION (JULY - SEPTEMBER 2021)

REPRESENTATIONS MADE ON BEHALF OF F&C COMMERCIAL PROPERTY HOLDINGS LIMITED (AS ADVISED BY BMO REAL ESTATE PARTNERS AND STANHOPE PLC)

VICTORIA CRESCENT, 35-39 THE BROADWAY, 1-11 VICTORIA CRESCENT, WIMBLEDON (REF. Wi11)

SEPTEMBER 2021

Background and Tests of Soundness

These representations have been prepared by Savills on behalf of our clients, F&C Property Holdings Limited (as advised by BMO Real Estate Partners and Stanhope Plc).

BMO is the asset manager (with Stanhope as the development consultant) for F&C Commercial Property Holdings Ltd who are the owners of Site Wi11 known as Victoria Crescent/Piazza, 39–59 The Broadway, 1–11 Victoria Crescent/Piazza, Wimbledon.

The owners are long-term and major investors in Wimbledon Town Centre having funded, managed and invested in the Victoria Crescent/Piazza since it was first developed by F&C Commercial Property Holdings Ltd's predecessor in title. They have a long term commitment to the future vitality and viability of Wimbledon Town Centre and continue to be in consultation with LBM Officers on future aspirations for the Site.

Victoria Crescent/Piazza is a mixed use, retail and leisure scheme with a site area of approximately 1 hectare in the heart of Wimbledon town centre within designated core shopping frontage. It is divided into two main buildings, laid out in a crescent shape with a piazza fronting the Broadway and with a pedestrian walkway running from the Broadway through to Hartfield Road.

Victoria Crescent/Piazza is strategically situated in close proximity to the station as one of the largest single ownership sites with a significant retail/leisure offer in the Town Centre. It has excellent public transport accessibility with a PTAL rating of 6B. The piazza is unique in presenting a large public open space which provides a sense of place within this central part of the Town Centre.

It is allocated for redevelopment (in the form of town centre uses) within LBM's Stage 3 (Regulation 19) Pre-Submission Consultation Plan (Site Wi11). It is therefore one of the most strategically important sites in Wimbledon Town Centre.

Victoria Crescent/Piazza adjoins the Hartfield Road surface car park (0.45 hectares) owned by LBM (draft site allocation Wi5). Discussions have been held between BMO/ Stanhope and LBM exploring the potential for complementary regeneration incorporating both ownerships.

BMO's objective is to enhance and develop Victoria Crescent/Piazza as a key part of the current and future plans for Wimbledon Town Centre's transformation, and these representations have been prepared on this basis.

In order to be found sound at LBM's forthcoming Local Plan Examination in Public, the policies in the draft Local Plan need to comply with the tests of soundness set out in NPPF35 (July 2021). The plan must be:

- "a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.” (author’s emphasis underlined).

NPPF8 defines sustainable development in the form of achieving economic, social and environmental objectives, in that sequential order - with economic objectives being of the priority in creating a “strong, responsive and competitive economy.”

LBM’s new local plan is required to be prepared in general conformity with the new London Plan (2021). In particular, the new London Plan encourages more tall buildings to meet the future development needs of London, and on that basis new density of development will need to be optimised at these suitable and appropriate locations. In some areas, especially town centres enjoying good public transport connections, tall and taller buildings will need to be built. The NPPF guidelines and newly adopted London Plan policy on tall buildings are considered in detail as part of these formal representations when addressing the tall buildings approach under LBM’s new tall buildings policy (D12.6) and in the context of Wi11 site allocation.

BMO welcomes and supports the continued allocation of Victoria Crescent (Wi11) for redevelopment. However, the representations provide for re-wording and certain changes to the draft allocation to ensure consistency with other parts of the pre-submission local plan and the London Plan. Such changes are made to ensure effective and positive policy more generally in the context of the NPPF’s tests of soundness. Policy recommendations are found at the end of each policy sub-section with strikethrough text representing deletion and bold as additional text.

<p>Chapter 01B: Good Growth Strategy</p> <p>Chapter 01B sets out the Council’s commitment to high quality developments and that higher densities will be appropriate in certain areas:</p> <p><i>“In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough’s acute housing needs.”</i></p>	<p>BMO acknowledges and supports the approach in encouraging higher densities within highly accessible town centre locations such as Wimbledon Town Centre – this is a well-recognised and well-established NPPF and London Plan policy stance. Wimbledon is identified as a defined “Major Centre” within the London Plan (with “high” residential and commercial redevelopment potential). It is a major Opportunity Area (within the wider Colliers Wood and South Wimbledon area) identified for new jobs and homes with excellent public transport accessibility (6b). The London Plan actively encourages “significant levels of mixed use development” within such locations including town centre uses such as retail or leisure, with emphasis on development optimisation.</p> <p>The London Plan is clear that given the significant “step change” in capacity and connectivity offered by Crossrail 2, this will transform Wimbledon into a major transport hub. In turn, it states that there is “opportunity to plan for significant growth and intensification, with residential and commercial development.”</p> <p>It is therefore considered that the commitment should be towards encouraging “high and higher densities” in order to fully utilise the unique development opportunity within these town centre locations. This approach will significantly enhance their vitality and viability in accordance with the NPPF and London Plan guidelines.</p> <p>Therefore densification and intensification of new development should be actively embraced and hence the reference required to “high densities” also. Optimisation of sites encourages innovative design and high quality, place making and this should be actively promoted within the new local plan.</p>
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	<p><u>Policy Recommendation</u></p> <p>The above policy wording change should therefore be read as follows: <i>“In accordance with the London Plan, neighbourhoods with good public transport accessibility level (PTAL) such as Wimbledon, Morden, South Wimbledon, Morden and Colliers Wood will generally expect high or higher densities towards the higher end, considering all aspects of local character such as heritage assets, open spaces and setting, while having regard to the borough’s acute housing needs.”</i></p>
<p>Chapter 01C: Urban Development Objectives and Vision</p>	<p>The overall vision is acknowledged (see separate comments on draft climate change policy) for the borough including that by 2036 the Council will have created attractive, safe and secure 20 minute neighbourhoods to live, work and socialise. In order to achieve this objective it is important that a vibrant mix of uses is encouraged within town centres at optimal density (subject to impacts) in order to ensure that this vision is achievable, viable and deliverable (see also formal comments on draft allocation Wi11 below which form part of these formal representations).</p>
<p>Chapter 9: Wimbledon</p>	<p>BMO support Wimbledon Policy N9.1 and in particular the following commitments:</p> <p><i>“a. Promoting Wimbledon as south west <u>London’s premier location</u> for business, leisure, living and culture: an exemplar for good quality and sustainable place-making.</i></p> <p><i>b. Driving investment and innovation in workspaces to support the local economy and jobs in the town centre commensurate with <u>Wimbledon’s role as a Major Centre</u>. Encourage development that attracts residents businesses, visitors and tourism to the area all year round, including high quality hotels, conference facilities and cultural activities.</i></p> <p>.....</p> <p><i>f. <u>Strengthening the position of Wimbledon as a Major Centre in south London through the redevelopment of key sites within the centre.</u>”</i> <i>(author’s emphasis underlined).</i></p> <p>It is important that these aspects of this important growth related policy are reflected within Site Allocation Wi11 to ensure that the objectives set out can be delivered. This will ensure that the policies in the plan are effective, positively drafted and meet the NPPF soundness tests.</p>
<p>Site Allocations: Site Allocation Wi11</p> <p>The draft allocation (at site allocation sub-section), identifies:</p> <p><i>“A mix of uses including retail, pub or drinking establishment, financial and professional services, assembly and leisure, hotel with the re-provision of public realm. The priority for the site</i></p>	<p>BMO actively supports the allocation of Victoria Crescent (Site Wi11) for comprehensive redevelopment and acknowledges the recognition within the draft allocation that this is a prominent town centre site. More detailed comments are provided below in relation to certain parts of the draft Wi11 allocation with recommended policy change.</p> <p>i. Mix of uses (“site allocation” sub-section)</p> <p>The draft allocation states that the priority for the site should be town centre uses. Main town centre uses are defined in the NPPF 2021 Glossary (page 68) as:</p> <p><i>“Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and</i></p>

should be town centre uses. There may be some scope for residential on upper floors facing Hartfield Road where this improves viability.”

recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)” (author’s emphasis).

Both the London Plan and the Pre-submission Local Plan (at paragraph 9.1.20) recognise Wimbledon Town Centre as an ideal location for new office investment and development. This needs to be accurately reflected within the Wi11 allocation to ensure **offices** are described within the wider description of allocated town centre uses. Post-pandemic, draft policy land use allocations need to be as flexible and inclusive as possible in order to be adaptable and responsive to market demand change. Further, on a very similar basis, **restaurants and cafés**, as important defined town centre uses should also be explicitly referenced within this section of the draft Wi11 allocation. There is high demand for these uses at this part of Wimbledon which will only contribute further to the vibrancy of strategic, mixed use development at this location with much improved public realm through the regeneration. Both such uses identified will, in turn, ensure lasting vitality and viability for the town centre, now and for the future. This policy change will therefore ensure consistency and conformity with the NPPF and London Plan and leave no ambiguity at the time of a later planning application.

Wi11 currently restricts residential to upper floors on the Hartfield Road frontage, stating “*there may be some scope for residential on upper floors facing Hartfield Road where this improves viability.”*

This restrictive approach is not justified in the absence of any planning policy, design feasibility or market demand justification. Residential on the upper floors, to support viability of the overall scheme, would be entirely appropriate and in line with LBM’s “Good Growth Strategy” objectives which encourages residential within highly accessible town centre locations and which the NPPF and London Plan actively promotes also. New residential uses incorporated into a wider mixed use, town centre regeneration proposal would be subject to high quality design and accommodation and could be applied across all parts of the site including the Broadway frontage. Delivering high quality residential accommodation is a key part of creating 20 minute neighbourhoods in which to live, work and socialise, which is one of the main objectives set out in the Council’s vision for the borough within Chapter 01C (Urban Development Objectives and Vision). The London Plan actively encourages high density, residential development at well-connected, town centre locations. Wi11 offers a significant opportunity therefore in contributing towards LBM’s minimum housing target having regard to the acute housing need facing the borough and London, as a whole.

Policy Recommendation (Wi11: site allocation sub-section):

*A mix of **town centre** uses including retail, pub or drinking establishment, **cafes and restaurants**, financial and professional services, assembly and leisure, hotel **and offices** with the re-provision of public realm. The priority for the site should be town centre uses (in line with definition in the NPPF). **There is also opportunity for ~~may be some scope for~~ residential uses of a range***

<p>In terms of approach to tall buildings, the draft allocation states:</p> <p><i>“Development proposals must have regard to the design led Future Wimbledon SPD.”</i></p> <p><i>“Development of the site could include taller buildings subject to consideration of impacts on existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD.”</i></p>	<p><i>of mix and tenure type to improve vibrancy and viability and positively add to the place making regeneration of this strategically important town centre site.”</i> on upper floors facing Hartfield Road where this improves viability.</p> <p>ii. Tall Buildings (“<i>design and accessibility guidance</i>” sub-section and summary of “<i>site location</i>”)</p> <p>In the first instance, pre-submission policy D12.6 identifies “tall” buildings being appropriate for designated Town Centres to include Wimbledon.</p> <p>D12.6 defines tall buildings in the borough as relating to those of a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey (in accordance with adopted Policy D9 of the London Plan).</p> <p>The adopted Future Wimbledon SPD (2020) identifies potential for “up to” 8 storeys on the majority of the Wi11 Site and also potential of “up to” 10 storeys within the south eastern area of it. Therefore, taken simply in terms of tall building definition, the reference within draft Wi11 allocation - should be to “tall” building not “taller” building in compliance with D12.6 (sub-section (p), in particular) and London Plan D9.</p> <p>Further, D12.6 in defining Wimbledon Town Centre as a location suitable for “tall” buildings by definition, indicates that “<i>tall buildings must be appropriately sized and located and will be appraised case by case.</i>” It further states that “<i>in the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and a sense of place.</i>”</p> <p>The SPD itself recognises at paragraph 5.3.54 that “<i>applicants will need to justify height in line with other relevant local and Mayoral policies</i>” implying that the detailed impact testing (for example, heritage impact, townscape and views and sunlight and daylight) have not been undertaken in identifying indicative heights for sites within the SPD document. Such detailed design and technical impact assessments will clearly need to be undertaken in support of future application proposals. Further, paragraph 5.3.60 states that “<i>the building height guidance should not be taken as writ, but be used to inform what level of uplift in height may be considered appropriate for the context of each site. Building height guidance must be considered alongside architectural quality, mix, contribution to public realm, neighbouring context, sustainability and other relevant policies.</i>”</p> <p>It is further stated at paragraph 5.3 .61 that identified building height should not be “<i>over-prescriptive in this guidance document.</i>” That is entirely correct given that no detailed design feasibility has been undertaken to support the “<i>building height guidance map</i>” (at page 51 of the SPD); it is only through detailed design and impact assessments to support future application proposals will the exact height and density be determined with appropriate design mitigations and enhancements in place. This is recognised within the SPD itself.</p>
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Therefore, the reference to future application proposals at Wi11 being “*in line*” with the Future Wimbledon SPD, must be removed to ensure consistency with draft D12.6, London Plan D9 and the SPD itself.

BMO submitted previous representations to the SPD at the time of its consultation identifying Wi11 as having clear potential for much taller buildings (than that indicatively identified within the draft document) with the suggestion of a “tall buildings cluster” around the station to include Wi11 (see also recommended policy recommendation to Policy D12.6 in relation to an identified “tall buildings cluster”). The SPD has not been subject to an examination (as this new plan will be) and it has been subject to objection particularly in relation to the tall buildings approach. These factors need to be accounted for in attaching weight to it as a material planning consideration when future planning applications are determined. Naturally, LBM will consider it as a backdrop to future planning application proposals and apply a certain weight to it and therefore it is not considered necessary to incorporate within site allocation references, and in particular Wi11.

It is therefore recommended that all **references to the SPD within Wi11 are removed on the above basis**. Applying references which indicate that proposals are required to accord with SPD guidance would present a situation where storey heights would be unduly restricted (based on no evidential justification). It is only at the time of an application scheme when impact assessments which underpin it are undertaken, will appropriate density and height (alongside other core design considerations) be determined. This is also concluded in the wider context for Wimbledon as a Town Centre being “*competitive and resilient*”; where high density, tall building schemes at sites such as Wi11 will only positively contribute towards this important vision.

Recommended Policy Change

Design and Accessibility Guidance

*“Development proposals ~~must~~ should aim to **demonstrate optimisation through an innovative, design-led approach in creating high quality regeneration of the site. The Future Wimbledon SPD should be a benchmark for minimum height and density considerations (acknowledging part of the site is already identified for up to 10 storeys) and with the scheme application itself (robustly supported by design and technical impact assessments) dictating exact parameters.**”*

The Site Location/ Approach to Tall Buildings

*Development of the site ~~eshould~~ include taller buildings subject to consideration of impacts on existing character and townscape **and in the context of optimisation and high quality, place-making design.**” and in line with the height parameters set out in the Future Wimbledon SPD.’*

iii. Site Deliverability

	<p>The site should not be restricted in terms of the timescale for coming forward given there could be opportunity for short to medium term delivery and this should be reflected within the draft allocation. It is therefore recommended that “5–10 years” is substituted with “0–5, 5–10 years” in the context of draft policy proactively encouraging early town centre regeneration at strategically important sites within the town centre.</p> <p>This is also consistent with the draft policy set out in Chapter 9 in actively promoting significant levels of development pre and post Crossrail 2 which is entirely in line with optimising growth potential within this Opportunity Area as per the London Plan.</p>
<p>Site Allocations: Site Allocation Wi5</p>	<p>The same formal comments (see Wi11 above) are applied in relation to Wi5 draft allocation concerning: referencing of “tall” building potential; consistency in range of town centres uses allocated as per Wi11 proposed changes; early site delivery; and matters relating to SPD referencing.</p>
<p>Policy D12.6 Tall buildings</p> <p>The policy identifies that “<i>proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the wider Morden Town Centre Area.</i>”</p>	<p>BMO actively supports draft D12.6 in terms of defining “tall buildings” within designated Town Centres to include Wimbledon Centre. As expressed in recommended policy wording change to allocation Wi11 (within BMO’s wider representations), this tall building definition should be translated to strategically important town centre sites such as the Victoria Crescent site.</p> <p>London Plan Policy D9 indicates that London boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the plan. This process should involve a consideration of the areas identified for growth.</p> <p>The spatial strategy for the borough, as outlined in early chapters of the Pre-submission Local Plan, identifies Wimbledon as one of the key growth areas in the borough, in creating significant levels of new development both pre and post Crossrail 2 through developmental “<i>step change.</i>”</p> <p>Draft D12.6 identifies where the Council will generally support tall buildings and cites Wimbledon Town Centre, as below, at sub-sections (p), (s) and (t).</p> <p>“ <i>We will generally support tall buildings where:</i></p> <p>.....</p> <p>p. <i>They’re within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document.”</i></p> <p>The pre-submission policy goes on to state that:</p> <p>“<i>Development proposals for tall buildings should be supported by:</i></p> <p>s. <i>A detailed townscape analysis that includes short, mid and long views and analysis of its impact on the setting of heritage assets such as parks or buildings.</i></p>

t. A digital 3D model in agreement with the council that can be used to evaluate its visual impact across the borough and beyond.”

As set out above (under comments provided under Site Allocation Wi11), the draft local plan as currently drafted creates ambiguity around the approach to tall buildings in Wimbledon Town Centre. There are numerous draft policy references across the plan actively promoting significant redevelopment at Wimbledon, however continued reference also to the SPD to include at D12.6, under sub-section (p).

When read plainly, sub-section (p) identifies the potential for tall buildings within Wimbledon Town Centre with such heights (6 storeys or 18 metres and above) also identified within the SPD. However, it needs to be clear that the SPD should not be used to prescribe development parameters to include height at key sites such as Wi11 given the lack of evidential justification to support indicative height references within it which the document itself recognises.

The SPD has not been subject to an examination, there has been a level of objection to it on the tall building matters to include BMO's earlier representations in relation to Wi11, and the SPD itself recognises it is not a prescriptive set of guidelines where application proposals will dictate appropriate height and density based on detailed assessments. Design mitigation and enhancement to address any such impacts will be integral to the proposals in moving forward and in particular deal with matters identified in subsection (s) and (t) in terms of heritage, townscape and visual impact.

It is therefore questioned why sub-section (p) gives reference to the SPD given it will become a material consideration in the normal way at the time of an application being determined. It is therefore recommended that this sub-section removes such reference given also other design related criteria set out in D12.6 (and other criteria based, design-related policies elsewhere in the draft plan) which provides the Council further assurances that such particular impacts will be dealt with in terms of tall buildings and their design. At the application stage, of course, such proposals will need to achieve London Plan D9 tall buildings design criteria also.

Demonstration of how impact assessments (in particular townscape impact and views analysis) can support tall building proposals even if they sit outside defined tall building locations is apparent from a recent appeal decision in New Malden (appeal reference: APP/T5720/W/20/3250440 dated 29 June 2021).

In order to ensure policy is positive and effective in supporting regeneration of important strategic sites in highly accessible Town Centre locations such as Wimbledon, it is recommended that the policy wordings are changed as set out below.

Policy Recommendation

It is recommended that within D12.6 (at criterion (p)) **reference to the Future Wimbledon SPD should be removed** for all the reasons set out above and to ensure consistency with other pre submission growth policies for Wimbledon as a town centre.

	<p>In order to ensure that the policies are effective and in line with Policy D9 of the London Plan which states that boroughs should determine locations where tall buildings may be an appropriate, LBM should identify a defined “tall buildings cluster” within Wimbledon Town Centre of new building heights of up to 10 storeys and higher, subject to impact assessments.</p> <p>This designated cluster should include the Wi11 allocation which is already designated for up to 10 storeys within the southern western part and is entirely appropriate for such heights and potentially higher, subject to high quality design and impact testing.</p> <p>It is therefore recommended that sub section (p) is subject to the following change:</p> <p><i>“We will generally support tall buildings where:</i></p> <p>.....</p> <p><i>p. They’re within Wimbledon town centre as a location appropriate for tall buildings more generally with a strong presumption in favour of tall, dense buildings within the identified tall buildings cluster around the station.” as set out in the Future Wimbledon supplementary planning document.</i></p> <p>The “tall buildings cluster”, to include Wi11, could be identified on the summary site allocations plan within Chapter 9 or on the pre-submission proposals map, for the Local Authority to determine.</p>
<p>Chapter 02. Climate Change</p>	<p>BMO supports the promotion of environmentally sustainable design as an overarching principle for new development. It is noted that the draft Local Plan outlines the intention to set requirements beyond London Plan 2021 requirements via Policies CC2.2, CC2.3 and CC2.4.</p> <p>The result of meeting more stringent targets will be increased development build costs. Such additional development costs should be explicitly recognised within policy as having a direct impact on viability. The increase of a carbon offset payment from £95 per tonne (set out in the London Plan) to a minimum of £300 per tonne would also have impact on scheme viability, and the justification for this is inadequate as it does not recognise physical site constraints which can also restrict the ability of a site to deliver net zero carbon i.e. limitations in roof space including having regard to competing planning considerations such as plant associated with air source heat pumps or the delivery of amenity roof gardens. The Council should robustly test the additional costs through their viability evidence base for the draft Local Plan to ensure that the additional costs arising do not render development unviable such that this could impact the delivery of development to include those of strategic significance with other significant regeneration and other planning benefits.</p>

6 September 2021



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Dear Ms Butler,

LONDON BOROUGH OF MERTON LOCAL PLAN – STAGE 3 (REGULATION 19) PRE-SUBMISSION CONSULTATION (JULY - SEPTEMBER 2021)

On behalf of our clients, F&C Property Holdings Limited (as advised by BMO Real Estate Partners and Stanhope Plc), please find enclosed representations in relation to London Borough of Merton's Local Plan Pre-Submission Version.

BMO is the asset manager (with Stanhope as the development consultant) for F&C Commercial Property Holdings Ltd who are the owners of Site Wi11 known as Victoria Crescent/Piazza, 39–59 The Broadway, 1–11 Victoria Crescent/Piazza, Wimbledon.

As highlighted within the representations, the owners are long-term and major investors in Wimbledon Town Centre having funded, managed and invested in the Victoria Crescent/Piazza since it was first developed by F&C Commercial Property Holdings Ltd's predecessor in title. They have a long term commitment to the future vitality and viability of Wimbledon Town Centre and continue to be in consultation with LBM Officers on future aspirations for the Site.

BMO welcomes and supports the continued allocation of Victoria Crescent (Wi11) for redevelopment. However, the representations provide for re-wording and certain changes to the draft allocation to ensure consistency with other parts of the pre-submission local plan and the London Plan. Such changes are recommended to ensure effective and positive policy more generally in the context of the NPPF's tests of soundness.

The representations relate to the following policies / chapters in the plan (a brief summary of the key points is provided below - this should be read alongside the representations, which discuss the issues in full):

- **Chapter 01B: Good Growth Strategy** – BMO support with minor wording changes recommended to ensure high or higher densities are encouraged in order to fully utilise unique development opportunity within these town centre locations.
- **Chapter 01C: Urban Development Objectives and Vision** – In order to achieve the vision set out it is important that a vibrant mix of uses is encouraged within town centres at optimal density (subject to impacts) in order to ensure that this vision is achievable, viable and deliverable.
- **Chapter 9: Wimbledon** – BMO support Wimbledon Policy N9.1. It is critical that the commitments made in this important growth related policy are reflected within Site Allocation Wi11 to ensure that the objectives set out can be delivered.
- **Site Allocation Wi11** - BMO actively supports the allocation of Victoria Crescent (**Site Wi11**) for comprehensive redevelopment and acknowledges the recognition within the draft allocation that this is a prominent town centre site. Detailed comments are provided within the representations in relation to certain parts of the draft Wi11 allocation (including mix of uses, tall buildings and site deliverability) with recommended policy change, to include identifying future development potential of "tall" buildings at

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this strategically important town centre location. In terms of land use, offices, restaurants and cafes, as important town centre uses, should be explicitly referenced within Wi11 allocation for the reasons set out in the representations.

- **Site Allocation Wi5** - The same formal comments (see representations in respect of Wi11) are applied in relation to Wi5 draft allocation concerning: referencing of “tall” building potential; consistency in range of town centres uses allocated as per Wi11 proposed changes; early site delivery; and matters relating to SPD referencing.
- **Policy D12.6 Tall buildings** - BMO actively supports draft policy D12.6 in terms of defining “tall buildings” within designated Town Centres policy to include Wimbledon Centre. As expressed in recommended policy wording change to allocation Wi11 (within BMO’s wider representations), this tall building definition should be translated to strategically important town centre sites such as the Victoria Crescent site. In order to ensure that the policies are effective and in line with Policy D9 of the London Plan which states that boroughs should determine locations where tall buildings may be appropriate, LBM should identify a defined “tall buildings cluster” within Wimbledon Town Centre of new building heights of up to 10 storeys and higher, subject to impact assessments. This cluster should include Wi11 as a strategically important town centre regeneration site close to the station. To ensure consistency with other pre-submission growth policies for Wimbledon as a town centre all reference to the future Wimbledon SPD should be removed. Changes to the policy wording are therefore recommended to address these concerns (again, as set out in the representations themselves).
- **Chapter 02 Climate Change** - BMO supports the promotion of environmentally sustainable design as an overarching principle for new development. It is noted that the draft Local Plan outlines the intention to set requirements beyond London Plan 2021 requirements via Policies CC2.2, CC2.3 and CC2.4, which are likely to lead to increased development costs. The Council should robustly test the additional costs through their viability evidence base for the draft Local Plan to ensure that the additional costs arising do not render development unviable such that this could impact the delivery of development to include those of strategic significance with other significant regeneration and other planning benefits.

BMO are supportive of the general thrust of the plan, however, as set out in the representations there are a number of areas where it is considered that changes are required to the policies in order to ensure that they meet the tests of soundness set out in the NPPF.

We ask that the Council continues to engage with BMO in its consultations. We request the right to participate in the Examination and attend any relevant hearings in order that the Inspector can fully understand our client’s position.

BMO looks forward to working closely with the Council to deliver high quality redevelopment of this strategically important town centre regeneration site for Wimbledon and the borough.

Jane Barnett (Director) (JABarnett@savills.com) or Catherine Mason (Associate Director) (07870 999336, cmason@savills.com) are available should the Council wish to discuss the representations or any aspects of the site.

Yours faithfully

Savills