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Ms Carmel Edwards
Programme Officer
Merton Local Plan Examination
Merton Civic Centre
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19/05/2022

Via email to
programmeofficer@carmeledwards.com

Dear Ms. Edwards,

**CENTRE COURT SHOPPING CENTRE, WIMBLEDON, SW19 8YE
TOWN AND COUNTRY PLANNING ACT 1990
REPRESENTATIONS MADE ON BEHALF OF ROMULUS**

We write on behalf of our client, Romulus Limited, the owners of Centre Court Shopping Centre, SW19 8YE ('the Site' / 'Centre Court'). Their ownership includes proposed site allocation Wi16 as identified within Merton's Local Plan document '0D4aii Proposed Main Modifications to Merton's Local Plan dated 28th March 2022'.

On behalf of Romulus, this letter seeks to provide formal written representations to the Merton Local Plan Stage 1 Hearings, which are due to take place in June 2022. This follows the issuing of the Inspectors Matters, Issues and Questions ("MIQs") in April 2022.

It should be noted that Romulus have submitted representations in relation to the following Main Matters to be covered by the Stage 1 Hearings in June 2022:

- Matter 3 – Climate Change; and
- Matter 10 – Employment uses, town centres and the Opportunity Area.

For clarity and as requested by the Inspectors, Romulus have prepared a separate written statement for each Main Matter to which they make representations.

This letter therefore provides Romulus' written representations to the examination of the Merton Local Plan, Stage 1 Hearings, in relation to **Main Matter 3 only**.

For reference, Main Matter 3 covers the following:

"Does the Plan include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change? And are the climate change aspects of the plan consistent with national policy, in general conformity with the London Plan, justified and effective?"

ABOUT ROMULUS

Romulus are a London-based property investment and development group which owns and manages over 1 million sqft of prime office, retail, hotel and leisure space in London and the USA.

Romulus have been successfully developing and managing properties for over 40 years and their strategy focuses on continual investment to redevelop and add value to their assets. This includes through refurbishment and repurposing.

Romulus acquired Centre Court in Spring 2021 and has since undertaken a detailed review of the current operations of the Site, its function, current layout and use of space. As part of this review, Romulus has identified significant opportunities to bring new life and experiences into Centre Court to ensure the Site retains its position as a hub of community activity for local residents and businesses.

The pandemic has highlighted the structural changes taking place in terms of how people work and live. This has highlighted the need to provide adaptable, high-quality places to work and live. Romulus believes that the Site can be that hub, providing new shopping experiences, places to eat, leisure, flexible workspace and new homes, adjacent to a major public transport interchange.

To enable such opportunities to be realised, Romulus are seeking to undertake a phased programme of improvement works to Centre Court.

Phase 1 of the improvement works, which are already underway, seek to focus upon repurposing elements of the existing floorspace, introducing a mix of new uses and undertaking amendments to the internal configuration of the Site. The aim is to retain and adapt successful elements of the existing Site, whilst making targeted interventions which address historic issues with Centre Court, which has resulted in parts of the Site becoming vacant in recent years.

Phase 2 of the works are yet to be formalised but there is a strong aspiration from Romulus for the Site to become a destination to live and work. In line with proposed Site Allocation Wi16, Romulus foresee the Site as being capable of achieving *“a mixture of Town Centre Type Uses such as community (including health and wellbeing), retail, restaurants and cafes, financial and professional services, leisure, offices, hotel, residential and last mile distribution.”*

MAIN MATTER 3

Whilst Romulus do not wish to provide detailed commentary on each issue and question raised by the Inspectors in their MIQs, we do wish to make a number of site-specific comments in relation to how any current and future development proposals at the Site will align with the themes outlined in Main Matter 3.

The Merton Local Plan seeks to mitigate and adapt to climate change through promoting development which maximises energy efficiency, incorporates green technologies, and promotes effective resource use including circular economy principles.

Romulus are committed to ensuring that both Phase 1 and Phase 2 development proposals at the Site are brought forward in a sustainable manner in line with London Plan and Merton Local Plan policy. This includes the implementation of a re-use, retrofit and adaptation-first policy at Centre Court, in line with circular economy principles.

Under Phase 1, Romulus have sought to repurpose and reconfigure units within the Site for alternative uses, including provision of office, leisure and private medical floorspace to attract new tenants and visitors to the Site and wider Wimbledon Town Centre.

For Phase 2, Romulus have made a guarantee that they will not be undertaking wholesale demolition of Centre Court. Instead, Romulus will be working with the existing structure of Centre Court, aspiring to retain over 90% of the building and thereby saving significant embodied carbon in line with Policy CC2.5 of the Merton Local Plan. Romulus support the Council's policy in this regard.

The energy strategy for future Phase 2 development will also seek to help deliver Merton's net-zero ambition, through the construction and operation of a highly energy efficient development, which maximises the use of low-carbon and renewable energy technologies and includes for the provision of significant green infrastructure.

Merton's aspirations for low-carbon development are being delivered under Phase 1 through the introduction of new landscaping to Queen's Road and The Broadway, installing beehives on the roof of the Site and increased natural ventilation into the retail areas of Centre Court through installation of a retractable roof.

Whilst details of Phase 2 are yet to be finalised, the proposals will seek to incorporate PV panels, green walls and roofs, water-saving technologies including rainwater harvesting and ecological enhancements where possible. This will help ensure the future proposals meet Policies CC2.2, CC2.3 and CC2.4 of the Merton Local Plan.

Regarding construction, Romulus are keen to ensure that any Phase 2 proposals incorporate modern methods of construction and the use of sustainable materials wherever possible, including the potential use of timber-framed structures. This will maximise the efficiency of the building form and fabric.

Aspirations for new development within Merton to support healthy and sustainable lifestyles will be at the heart of the Phase 2 proposals. Promoting active travel to Centre Court and improving connections to local public transport infrastructure, most notably Wimbledon Train Station, will form the basis of the Site's future transport strategy, helping to reduce congestion and improve air quality within the town centre.


Romulus are also considering how they can support local food growing initiatives, including through the provision of an 'Urban Farm' or similar concept which would enable sustainable, locally grown produce to be used in the cafes and restaurants at Centre Court. This would help promote low-food miles and sustainable farming practices to the local community.

CLOSINGS

We would be grateful if the Programme Officer could confirm that our representations have been received and will be considered as part of the Stage 1 Hearings in June 2022 in relation to Main Matter 3.

If you have any outstanding queries on this matter, please contact Julian Stephenson (julian.stephenson@montagu-evans.co.uk / 07818012537), Lauren Hawksworth (lauren.hawksworth@montagu-evans.co.uk / 07392139441) or Tom Pemberton (tom.pemberton@montagu-evans.co.uk / 07554346120) of these offices in the first instance.

Yours sincerely,



MONTAGU EVANS LLP