

From: wehraplanning >

Sent: 03 September 2021 11:08

To: Future Merton <Future.Merton@merton.gov.uk>

Cc: Councillor Martin Whelton; Chris Lee; stephen.hammond.mp; Councillor Nick McLean Councillor Mark Allison

Subject: MERTON STAGE 3 DRAFT LOCAL PLAN

SUMMARY

On behalf of Wimbledon East Hillside Residents' Association, I wish to share our disappointment with FutureMerton's Stage 3 Local Plan.

Wimbledon is often described as 'the beating heart' of Merton. We consider that the current proposals will not sustain or grow the town centre; rather it will lead to over-development resulting in ongoing decline of its perceived value to investors, businesses and residents as it becomes a less safe and attractive location to live, work and visit.

GENERAL COMMENTS

FutureMerton describes their draft plan quite generically:

The plan is designed to help guide how the borough develops over time and create a vision that enables the council to successfully and responsibly manage growth, while always ensuring the best interests of the borough, its residents and businesses.

Merton is rich in assets and the opportunities they inevitably create. It is a place ripe for sustained economic success, and the New Local Plan will mean that for years to come there will be a sound and consistent approach to ensuring a bright future for the borough and all who live and work here.

It would appear that despite all the changes going on in the world, FutureMerton is forging ahead with another convoluted document, incapable of guiding us safely through the next 20 years. It is written as if the pandemic is over, no social changes are happening, and no environmental challenges have emerged in the past few years. This draft needs to be replaced with a concise, actionable Plan, written by someone who has both knowledge and vision; someone who can write in crisp, simple sentences, without cliché. We require a robust Plan that can navigate Merton through these dangerously challenging times.

There are three major challenges in Merton and the wider world which should be **centre stage** in the proposed Local Plan to guide us through to 2040. These are:

1. CLIMATE EMERGENCY

There is a Climate Emergency – indeed, Merton Council has declared one. So most attention should focus on addressing this critical environmental challenge. Air pollution is a very serious problem in Merton, flash flooding threatens all our local communities, and our significant tree canopy is under threat from both developers and Merton officers. The planning department contribution appears conflicted, unable to develop, let alone enforce a zero carbon built environment within the next few years.

2. CROSSRAIL2 - The Bubble has Burst

Crossrail2 is not going to be built in Wimbledon before 2040, indeed, quite possibly never. Yet the Stage 3 Plan still envisages a skyline of tall new office buildings which will be irrelevant, many at three times the height of the existing street scene.

3. COVID-19 PANDEMIC

The Covid-19 pandemic is not over; it may never really go away, it will continue to impact the way we live, work, and socialise for many years to come. It will have/is already having a fundamental impact on our built environment.

SPECIFIC COMMENTS

The following are specific examples of references in the Council's Stage 3 Local Plan draft which illustrate how little guidance is being proposed to deal with the above world-changing events.

1. CLIMATE EMERGENCY

Look at an example from Chapter 01B, Good Growth Strategies, where Merton describe their idea of 'good growth' as 'strategy', conveying no urgency. Worryingly, there is no requirement to actually achieve any measurable success. An example is Merton's text is excerpted here: "... by **moving towards** a net-zero carbon city by 2050 and **adapting to the impacts** of climate change" (*highlights added*).

Get on the bandwagon and address the Climate Emergency head on. **Wimbledon specifically – the jewel in Merton's crown – should be the lead area, with an aim to be carbon-neutral by 2030. The rest of the borough following Wimbledon's lead, should become entirely carbon-neutral by 2050.** (This is an example of the precise language that is required, not more convoluted text within which anyone can still do anything they want, without recourse.)

For starters, simple, immediate action toward zero carbon must become the new **Merton Climate Emergency Rules**, the first being, that **No building - commercial, residential or other - may be demolished without an extremely convincing case.** Given 95% of existing buildings will be intact in 2050, why narrow your ambitions, and focus on the 5% on development sites of un-sustainably tall new office blocks? Focus on the 95%. Demand 'renovation/regeneration' of existing stock. Merton leadership/PAC appear addicted to an old-fashioned 'demolition/over-development' model. We can no longer haul away thousands of HGV-loads of brick/concrete rubble to landfill, and call it 'good growth!' (Any LETI-educated person will know the carbon footprint of all that rubble to landfill NEGATES any 'carbon neutrality' of the new building's during its lifespan.)

Requirements for both new builds and regeneration/renovation of existing buildings must include a basement moratorium, 'insulating the box', reduced glazing to cut heat loss & solar gain, rainwater retention, free-draining soil areas with seating/active frontage, energy-efficient heating/cooling system, rooftop biodiversity (bat/swift boxes, solar panels etc), all following guidelines from LETI (London Energy Transformation Initiative). The time for action is now.

With such a secure asset as Wimbledon (the place, the Brand), Merton planners must be much more confident, be brave. Merton must demand that any investor doing business in Wimbledon from now on will need to invest EVEN MORE here, to ensure delivery of zero carbon projects starting today, and by 2030.

2. CROSSRAIL2 - THE BUBBLE HAS BURST

Despite central government having pulled the plug on the CR2 programme, Merton's draft local plan still lists as their Vision and Strategic Direction, Spatial vision 1.26,

and I quote, “Crossrail2 is still under construction, nearing the end, and residents, community groups, civic societies, Love Wimbledon, businesses, the council and CR2 has worked together on a plan for the future of over-station development” There should be no attention given in the new Local Plan for big, ambitious planning and development in Wimbledon town centre in expectation of CR2. All efforts must focus on this Climate Emergency, and the Pandemic fallout (increased working from home; dramatic changes in office space requirements, reduction in commuting etc). Why do dreams for a new Crossrail2 hub persist within the ‘Wimbledon section’. Your authors cling to a fantasy that CR2 will still come during the life of this Local Plan. Meanwhile, pension funds and investors generally are selling out of Wimbledon, as they know CR2 isn’t happening.

3. COVID-19 PANDEMIC

Major social changes have come about, not least the need for people to be kept safe, and to make every effort to reduce transmission of this unusual virus. Working from home, social distancing, not travelling on public transport, and the resultant changes to former ‘plans’ to dramatically densify Wimbledon town centre area. Localism is replacing Globalism. All these plans must be set aside and re-drafted, to the ‘new world order’ coming into view.

Any ‘improvement’ to Wimbledon town centre must accept that the potential for the town comes from the HERITAGE/CHARACTER of Wimbledon Village. In Wimbledon: Policy 9.1, para 1, you describe Wimbledon (not the town on its own – but grown from the Village. The link to the Village, and to the wider heritage and renown of Wimbledon Village must be enhanced, not severed.

Chapter 9, P264 Wimbledon “A vibrant town centre” (sic)

Merton continues to demonstrate a lack of appreciation for the asset that is **Brand Wimbledon**. There is mention of ‘overarching vision’ and ‘character’ but the word missing is **HERITAGE**. It is the Heritage and Character of Wimbledon, drawn from a long, complex history back to the stone ages, that draws millions of people to Wimbledon, and at the core, the attraction stems from the Village, the Common and the tennis. The town must improve as an integral part of this Asset, not try to establish a separate identity. The past ten years of BID have shown there is still ‘no heart’ in the town, because the BID doesn’t understand the need to draw connections to the heritage/character of the Village and especially the essence of Brand Wimbledon. For example, why aren’t all the Conservation Area Victorian retail facades being restored to their former glory, as done across from Centre Court?! Neighbourhood CIL funds are perfect for such regeneration of the rich heritage/character that people flock to Wimbledon to see. (NB: on The Broadway, from McDonalds to Flights Direct, these lovely Victorian facades are in urgent need of regeneration, and CIL should be used for enduring projects that we all benefit from; similarly on the west side of Wimbledon Hill Road, a dozen facades should be restored.)

Wimbledon Policy 9.1

Item a) There is no mention of the existing primary stakeholders i.e. local residents. Homeowners’ outnumber Business stakeholder value by 15 to 1. It is unacceptable that FutureMerton discredit the importance of Wimbledon residents to the success of any future for Wimbledon (village, town, chase, park, south or west). For example, Wimbledon homeowners repeatedly have told FutureMerton of the need for affordable rental accommodation for essential workers in Wimbledon (nurses, carers, teachers, Tas, police and emergency responders). Where is the commitment to

develop local (i.e: 'within walking distance') housing for these people? The luxury flats beside the new YMCA are a mistake: a block of 'luxury flats' right next to 110 vulnerable men? As WEHRA and others advised, 'care workers' living right next door would have been a truly sustainable solution. Now coming into focus is the redevelopment of Centre Court; that provides a similar opportunity; Future Merton should amend the site proposals to include truly affordable rental accommodation for lowly paid but highly valuable local staff.

Item e) You talk about making Wimbledon town 'green'. In ten years, BID LoveWimbledon has allowed nearly every tree to die or become so starved of water and care, that they will not survive another year or so. The town is barren, filthy and unwelcoming. The first thing really needed in the town is a properly, democratically represented business association, that allows both chain and independent businesses equal say in how to improve the town. (Just look at the success in Wimbledon Village and Leopold Road, as examples of successful, locally managed business precincts.)

Item g) "Promoting a vibrant day, evening and night-time economy through a mix of commercial and community uses." This concept is not sustainable. Wimbledon town homeowners chose this area because it is a traditional community of primarily family homes, filled with young families with infants and school-aged children. Wimbledon, as it stands, is a dense, residential, sustainable community. It operates as an independent estate, and there are requirements for a good night's sleep that must be respected.

Continued pushing from LoveWimbledon and/or FutureMerton that a night-time economy must be permitted is poorly construed. For starters, Wimbledon people are in the main a professional lot, many dual income households, and they all need to SLEEP AT NIGHT.

Since the Licensing Act, 2003, many Application Hearings have dealt thoroughly with the problems associated with licensing activity after midnight. Indeed, nearly all the serious crime, ASB, noise nuisance and vandalism occur because of the very few venues that take advantage of 'later night-time liberty'. Illegal drugs are in abundance in the town, alcohol flows generously in both venues and from off licences in WTC after midnight. The 'real economy' is visible any given morning: vomit on the footpaths, urine and faecal matter in dark corners (even beside the Library entrance), litter and broken bottles, food scraps tossed, foraged by pigeons and rats. (This might be acceptable in Camden, but it is not here in Wimbledon town, village, indeed anywhere in the Borough. Please remove the suggestion that any night-time economy be encouraged in Wimbledon in the future. Local residents and arriving workers suffer a loss of amenity; they have to pay the price by having litter on their streets, bottles and butts tossed in our front gardens and even drunks sleeping in our alleys. You are squandering our council tax revenue on catering to visiting drunks and druggies. (It has been said that Croydon people come to Wimbledon to fight, leave blood on our streets, then get on the tram back home.)

Item i) Merton must ensure the increasing number and size of HGVs using our roads is reduced dramatically in the coming few years. Wimbledon Hill Road and the Broadway are the primary commercial areas for shopping and offices. Yet these roads are being compromised due to the continued and increasing level of HGVs tearing down the roads, ripping up tarmac and crushing mains water pipes and sewers. Even Richard Caring has noted the increasing number of HGVs tearing around the corner just outside his illustrious Ivy Cafe. One HGV a minute now crosses major junctions from Weir Rd, Alexandra Rd and Wimbledon Hill Road! This

is ruining not just the town, but the Village as well - reducing road safety, polluting our already dirty air and tearing up the tarmac and water/sewer pipes in their wake. Item k/l) Again, no mention of Heritage/Character of Wimbledon. There are many schools here, this is a major draw for residents to Wimbledon. And there exists a wonderful, mature green canopy, yet Merton appear bent reducing the canopy, not increasing it. The primary cause of deterioration of these assets are because of Planning decisions being made in the past five years or so, waving through unsustainable, overly-dense schemes in Wimbledon town area.

Item q) Tennis et al: Wimbledon is not only the finest tournament in the world; the event was founded here. Tennis is a metaphor for a well-lived life in Wimbledon. It is a major draw for residents, businesses, tourists and curious visitors. In the game of tennis, there are clear, strict and fair rules, and mutual respect for all. Likewise, a great respect here for wellbeing of its residents: for knowledge/education and lifelong learning, attention to detail, a love of nature, wildlife, green-ness, tidy gardens, large trees with generous, healthy canopies, fresh air. Merton needs to demonstrate appreciation for the Assets that are Brand Wimbledon. Yet FutureMerton is degrading the area with poorly conceived, unsustainable over-development, particularly in the town areas adjoining residential areas.

Policy 9.1.2 “Station and Railway”

Merton describes ‘a world class station, a sense of arrival.’ Why? What about: **Form follows Function**, especially for a busy commuter hub, working with a small footprint. Wimbledon is not a showy, 'extrovert' place like Essex. Such architecture is expensive, and belongs in Dubai; it is entirely inappropriate for Wimbledon. Please amend this policy accordingly.

Policy 9.1.12 “CR2 will be a key driver of change in Wimbledon.” Well, CR2 is not happening. Pension Funds/investors are now selling up and leaving Wimbledon, looking for better value and return on their investment. FutureMerton needs to respect that encouragement to build tall, pricey offices adjoining homes is not a sustainable use of land here.

Policy 9.1.20: “WTC accommodates the majority of office development in the borough, presenting as an attractive location for investment in SW London,” with two areas identified, the Bridge and Worple Rd. There is a great flaw in this proposal. Worple Road adjoins a densely populated, sustainable residential community, with many excellent schools, primaries, nurseries, care centres and doctor surgeries. These are all full to capacity, and any development of existing structures must be cautiously considered. The roads are always blocked during the daytime, there are only tiny footpaths on all these roads, the hard infrastructure is old and not capable of including any increase in density without negative consequences for existing businesses and homeowners, not to mention increased challenges from climate change. Flooding, for example, has become a critical issue, and Merton should put in place a basement moratorium until at least 2030, in order to get a handle on flooding mitigation BEFORE allowing more, taller, more energy-demanding buildings in these areas. There isn't enough mains pressure to go around as it is! Continuing to build/densify these areas will mean any impact on existing properties/businesses will be negative.

Policy 9.1.21: Hotels encouraged? Wimbledon is a premium area, and premium hotels are still lacking here. We now have a surfeit of cheap hotels and the cheap retail and take-aways that follow. WTC needs a more upmarket clientele to match existing stakeholders: upmarket residents and upmarket retail/leisure/commercial businesses. That is how a sustainable town grows/evolves.

Policy 9.1.23 "...Competitive advantage of night-time economy offers..."

Again, FutureMerton/LW have not calculated costs vs benefits of a night-time economy (ie: alcohol after midnight). The night-time economy in Wimbledon town and Wimbledon village have been and remain a DIS-ECONOMY. Yet Merton has never shared any calculation of the full cost of police/ambulance staff, vehicles, arrests, doctor/nurse/ER/hospitalisation costs, street sweeping, plate glass windows/doors (smashed ONE PER WEEK in WTC), the default filthy streets and footpaths, vomit/urine that nobody ever really washes away. Merton Leadership must insist on a full and transparent review of financial/social costs of the existing night-time economy in WTC. They will find that is most certainly is a diseconomy here and throughout the borough. Please amend this policy accordingly.

Policy 9.1.25: The Village ..."has few grocery stores but several high end 'chic' retailers....Again, FutureMerton doesn't get Brand Wimbledon. Please amend this section to reflect that here are four new grocery stores in Wimbledon Village, already very successful, adding further daily footfall to the thriving Conservation Area Shopping Parade.

Sites:

Wi10: Prospect House: This is a tall building, four storeys, owned by Henderson UK. It should be retained, renovated to a zero-carbon status to provide an EXEMPLAR in how to regenerate existing brick structures for future generations. Perhaps this could be an alternate site for affordable rental for key employees (see above).

Wi13: Sainsbury site: This is an aged site, needing regeneration, current owner Eskmuir Group but currently up for sale. Wrong to build offices/hotel in this area. Serious drainage problems, inadequate mains/sewers, dangerous traffic congestion in this area that perhaps needs to have the road closed off along Worple Pavement, should any intensification be considered here.

Wi16: Centre Court, owner Romulus. Again, serious problems within intensification on this site. A good alternate for affordable rental for key employees. Any proposals must include robust solutions to parking/road congestion, flooding, Thames Water deficiency, narrow footpaths, deficient in nature/soil/play areas, plus schools full to bursting in this area, and any housing proposals would need to fund a new school.

These are our views. I trust this letter gives FutureMerton an indication of what we consider to be a few of the conflicts that exist within the Stage 3 Local Plan. In our view this draft needs to be set aside, and a short, concise draft must be prepared as a matter of urgency. Clear direction is needed now more than ever, and the clock is ticking.

Yours sincerely,

Name redacted, WEHRA planning officer

Address redacted