

**From:**  
**To:** [Future Merton](#)  
**Cc:**  
**Subject:** Response of behalf of BARA TO Main Modifications to Local Plan (February 2024)  
**Date:** 22 March 2024 14:24:48  
**Attachments:** [Bara Response to the Main Modifications to the Merton Local Plan \(February 2024\).pdf](#)

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Dear Future Merton

Thank you for the opportunity of commenting on the Main Modifications to the Merton Local Plan.

Please find attached a response on behalf of the Battles Area Residents Association (BARA).

Kind regards

BARA Committee Member



# BATTLES AREA RESIDENTS ASSOCIATION



## **Response to Consultation on the Main Modifications to the Merton Local Plan by Battles Area Residents Association (BARA)**

We generally welcome the proposed Main Modifications to the Local Plan and are pleased to see that some changes have been made to the policies and site allocations affecting South Wimbledon in response to our representations.

We believe the changes have provided greater clarity to several key policies in the plan and in particular, we are pleased to see the greater emphasis now placed on the need for new development to respect local character and context and to promote community health and wellbeing (MM10, MM128 and MM198).

We also welcome the greater weight attached to the Merton Infrastructure Delivery Plan and the clear statement that development proposals must ensure that infrastructure requirements are met (MM38) and the clarity that all building heights in Wimbledon Town Centre will be subject to their impact on the existing character, townscape and heritage (MM113). The emphasis placed in the Main Modifications on design quality and the preparation of Design Guides and Codes is also welcomed (MM199).

Furthermore, we are pleased to see our concerns about the management and maintenance of the public realm specifically addressed in the Main Modifications (MM209). The revised and amplified policies on Climate Change are also supported.

Our more detailed comments are set out below:

### **Chapter 07: South Wimbledon**

With respect to the Main Modifications which relate specifically to South Wimbledon, we would comment as follows:

1. We are pleased to see Policy N7.1 has been amended to strengthen references to the need for new development to respect heritage assets and now include reference to the importance of protecting and enhancing Haydons Road Recreation Ground and the need to ensure the development of the High Path Estate is integrated with the wider area to ensure that development enhances the local environment (MM255). *However, in order to reflect the changes to policy N7.1, we believe the boundary of South Wimbledon should also be amended to include the whole of Haydons Road Recreation Ground.*
2. The amendments to Policy N7.1g relating to the redevelopment of South Wimbledon Station are welcomed. *However, we are of the view that the wording of the site*

*allocation (Ref: Wi8) should be further amended to reflect the changes to Policy N7.1. The redevelopment of this important site needs to be very carefully handled given site constraints. We believe a masterplan is required to show how it would integrate with the Local Centre and High Path Estate Regeneration Area and that the site allocation should be amended to reflect this. The future of this site is key to the regeneration of South Wimbledon and 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 also be fully engaged from the outset in shaping proposals and this should be referenced in the site allocation.*

3. We welcome the amendments to para 7.1.6 in the supporting text to Policy N7.1 and the changes to the policies map designations which now show the new Local Centre boundary, the site allocation Wi8 South Wimbledon Station and the High Path estate regeneration boundary on a single plan. This makes clear the importance of an integrated approach to development in South Wimbledon. *However, since site allocation Wi8 has been moved to Chapter 07 South Wimbledon, para 7.1.6 should be amended as it refers incorrectly to the site allocation being in Chapter 09 Wimbledon.*
4. We note that the objectives for South Wimbledon (p 261) have not been amended to reflect the Main Modifications. *Given the changes now proposed, we believe that it would be appropriate to add an additional/fourth objective which reflects these- **Enhancing local character and heritage: Promote new development which respects and enhances local character and opportunities to celebrate the area's unique local heritage.***

### **Policy IN14.2 Social and Community Infrastructure**

Whilst the Main Modifications (MM38) include the requirement for development proposals to ensure infrastructure requirements are met, we believe Policy IN14.2 should also be amended to reflect this commitment. *Necessary infrastructure should 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).*

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

It is noted that the indicative site capacity for site allocation Wi1 has been increased from 50-75 to 70-103 residential units in the full version of the Local Plan incorporating the main modifications but we could find no details of the proposed changes in the Schedule of Main Modifications or the Schedule of Additional Modifications. It is therefore unclear what the justification for this change is and whether the impacts of the proposed changes been assessed including the impact on local character and amenity and infrastructure capacity.

We are concerned about the potential impact on the local area of increasing the indicative capacity of this site for housing development by what amounts to almost 50% and the

implications for development mix. Unlike all other site allocations, no details are provided in the table in the current draft under site allocation. In the previous draft this was given as: *'Any of the following uses or a suitable mix of community (including education), sport/leisure facilities and residential'*. We have previously voiced our concerns that the site allocation could allow for a purely residential development without any community uses and our concerns have been compounded by the modifications now proposed. 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 a council owned site, the Council has the opportunity to promote an exemplar scheme which promotes health and wellbeing and other policy objectives which have been further strengthened as a result of the Main Modifications.

*Without further justification for the proposed changes, we would object to the proposed amendments to site allocation Wi1. We also believe the site allocation for Wi1 should clearly state 'A suitable mix of community (including education), sport/leisure facilities and residential' as in previous drafts.*

**Battles Area Residents Association (BARA)**

**March 2024**