

From:
To: [Future Merton](#)
Cc:
Subject: Local Plan, Hillside and Environment
Date: 19 March 2024 16:57:16
Attachments: [Local Plan comments to inspectors.pdf](#)

Dear Paul, Tara and team,

I attach my comments, as ward councillor for Hillside, on the proposed amendments to the Local Plan. Apologies for the presentation, I don't have Councillor Willis' computer skills, but I hope the references will make sense.

I have two primary areas of concern, one is the cumulative effect of many small changes to reduce DPAC's discretion to reject tall buildings in the allocated strategic areas and those immediately adjacent. Hillside is particularly affected because of the cheek by jowl juxtaposition of (non heritage, but pretty and low rise) attractive residential or semi residential streets and squares, and tall buildings.

I am also concerned by the weakening of obligations on developers that are there to protect the environment or improve areas deficient in nature (Hillside would be an example).

Best wishes,

Councillor Susie Hicks

Hillside Ward (Liberal Democrat)
Email: Susie.hicks@merton.gov.uk

Drop-ins 1st Saturday in every month at Wimbledon Library, 1030-12.30, come and meet your councillor, no appointment needed.

Any personal data or and/or special category data that you have supplied to me for the purpose of dealing with your query will be processed in accordance with my privacy policy, which is available [here](#).

Future Merton Local Plan

LB Merton

Civic Centre

London Road

Morden SM4 5DX

From Councillor Susie Hicks

Civic Centre

London Road

Morden SM4 5DX

Dear Future Merton Team

MERTON'S LOCAL PLAN, PROPOSED AMENDMENTS, COMMENTS FROM HILLSIDE WARD COUNCILLOR

My observations for the Inspectors are as follows –

Heights in Central Hillside/Wimbledon Town

The Hillside/Wimbledon Strategic Heights Diagram shows an area, delineated in black, where the inspectors say heights of “up to 24m may be appropriate” . It runs to the end of the gardens in Mansel Road, down the little bit of Malcolm Road where Luma used to be, down the alleyway to the East side of Tabor Grove and down Alt Grove to the Railway line. It includes the Wimbledon High end of Mansel Road (tho not the school) and the beginning of Woodside (both of which have tall buildings at the moment), and includes the conservation area on Wimbledon Hill Road and around St Mark's Square, much of which is pretty, low rise, locally listed or residential.

Within this area, and overlapping it because the ellipses are computer drawn, there are two areas allocated for development where the inspectors consider buildings up to 40m and 49m may be appropriate.. The proposed amendments mean that these are not maximum heights. In theory there is a discretion to build shorter or taller “ as appropriate”, but this provision, together with the stepping provision in relation to land adjacent to the allocated strategic height areas, I fear will make it very difficult to resist height creep into the little residential roads behind St George's Road and beside and beyond Tabor Grove, the low rise areas around St Mark's Square and some residential parts of Alexandra Road. I would like clarification that where the black line delineating the 24m zone is overlapped by the 40m and 49m ellipses, it is the black line which informs the height policy for those streets. The protective elements of “exemplary design, good PTAL (it is of course excellent in

Hillside) and impact on existing character, heritage and landscape” will not be enough to outweigh the pressure to build tall and intensively if DPAC is faced with a proposed tall building with other tall buildings on one side, and a residential street on the other, and the latest changes make this more likely rather than less.

I fear that when it comes to a clash between an application for a 40 or 49m building just outside these zones, and the protection of the local character/charm of our little residential streets and squares, these amendments leave very little protection – there will be a clash between protecting the character of these areas, and the pressure to intensify building and building heights, and in my experience on DPAC, conservation and character tend to lose out on these arguments.

Much of the centre of Hillside (particularly in the red zone) is already built up with tall office buildings, many of which are in desperate need of improvement. The three sites in the centre (wi10, Wi9 and Wi13) are set at 40m which is a little taller than the nearby buildings which tend to be 30-37m. My principal reservation about this area is that it is at present allocated primarily for office space, and in one instance (Prospect House, Wi10 next to the empty site at the corner of Francis Grove and St George’s Road, which is Wi9) is not allocated for residential at all, and should be, to preserve flexibility in a changing market.

Policy N9.1 (p289) adds the words “Supporting tall buildings within Wimbledon Town Centre in accordance with the details in the Strategic Heights diagram for Wimbledon Town Centre and the requirements of Policy D12.6 Tall Buildings”. Policy D12.6 is already in the Plan, the site allocations and emphasis on Height in the town centre are already contained in the strategic heights diagram, and this wording implies tall buildings should be supported merely because they are tall. Ending the passage at N9.1d with the words “supporting high quality architecture and design with traditional urban blocks with active frontages” removes this unnecessary emphasis, which, if left in place, will reduce DPAC’s ability to exercise its discretion and flexibility.

Two other areas contribute to making it harder to say no and reducing flexibility on heights, viz

The amendment at p17 from “taller” to “tall” buildings (24m, aside from the zones where 40m or 49m “ can be appropriate”) and the removal of the words “up to” mean that it will be very difficult to say no to buildings taller than the posited “appropriate” heights, and contributes to the increased pressure from these amendments various to “build tall” in the allocated sites.

At 1.2.41 " we will expect high quality developments with higher densities, where appropriate, that can appropriately be delivered by the efficient use of land, particularly in areas with good PTAL and in Merton's OA....neighbourhoods such as Wimbledon... will generally expect densities towards the higher end...."

Both of these, together with the characteristics of Hillside where office space and low rise frequently meet and mingle, make it important that where flexibility can be retained, it should be, and that the protection of maximum heights should be retained.

I am also concerned about the new “stepping down” provisions at p444, viz

“In instances where the applicant is proposing the redevelopment of a site immediately adjacent to the tall building boundaries and clusters identified in the Strategic Height Diagrams, local design codes or design codes may be used as part of a robust design-led approach to demonstrate the appropriate stepping up of heights above or below those stated and avoid abrupt transitions in building heights”

In principle this sounds reasonable, but I fear its effect will be licence to developers to build beyond the boundaries of both the tallest most central parts (49m and 40m) and areas immediately adjacent to the 24m zone, onto low rise residential streets and squares. I would rather this was taken out – it is a hostage to fortune that provides very little protection to some charming and/or residential areas in Hillside. I do not think the “character” provisions as drafted are sufficient to give adequate protection, given the pressure to build both tall and intensively in this area, and the removal of the “local” aspect of amenity (set out below).

Much of the centre of Hillside (particularly in the red zone) is already built up with tall office buildings, many of which are in desperate need of improvement. The three sites in the centre (wi10, 9 and 13) are set at 40m which is a little taller than the nearby buildings which tend to be 30-37m. My principal reservation about this area is that it is at present allocated primarily for office space, and in one instance (Prospect House, Wi10 next to the empty site at the corner of Francis Grove and St George’s Road, which is Wi9) is not allocated for residential at all, and should be, to preserve flexibility in a changing market.

There is an enormous amount of empty office space in the areas allocated for tall buildings (Prospect House has only one tenant on the top floor, Francis Grove next door is empty and for let, and the owners having abandoned plans to build tall premium offices, Tuition house has office space to let, so (according to the board outside) does 22 Worple Road (which is premium), Sterling House has office space to let, and Lidl, despite having permission to build premium office space, and wishing to preserve their retail outlet on the ground floor, have sold their site to a hotel chain, and that is without the 27,000 sq ft of office space that is supposed to be built to replace St George’s House East. Merton have been marketing the empty site at Wi9 for a very long time (over a year) and so far as I am aware still are. At the same time we have a pressing need both for accommodation and for footfall for local businesses. It is, therefore, crucial that Planning retains maximum flexibility, including the possibility of using all the allocated sites (Wi9, Wi10 and Wi13) wholly or partially for residential accommodation, I would therefore like the provisions for all three of these sites to maintain maximum flexibility for the next 15 years so far as is now possible.

Discretion

In other ways cumulative small changes have the effect of downplaying the importance of local character, for example,

1.2.50 (p21) re supporting the highest quality development that preserves amenity, enhances and conserves Wimbledon's rich heritage assets, character and appearance of place - taking out the words Local (amenity), Rich (assets) and and "of place" - creating a much broader, less Wimbledon-centric definition of Amenity, and diminishing the recognition of our heritage assets;

1.2.55 once again we lose the local in local amenity "creating a thriving walkable neighbourhood which preserves amenity (not local), the qualifier "local" should be kept to protect the character of the areas affected;

13.1.10 (p465) However we will also seek to minimise unintended harm from implementing flexible proposals that might occur to (local) amenity of existing businesses, residents or future users....(again "local" is removed);

All of these deletions reduce the significance of local characteristics, which in Hillside (subject to exemplary design) will be the main source of flexibility in the decision making process.

Softening of obligations on developers

There are a host of changes which weaken measures to protect the character of areas, or impose environmental protection. The list below is not exhaustive, but examples are

13.5 D (p484) The proposed amendment removes the protection for our small parades of "large increases in commercial floorspace in neighbourhood parades will be resisted",

cc2.2 (p46) softening of obligations on greenhouse gases - from "we will require all proposed development to demonstrate the fullest contribution to minimising green house gas emissions has been made on site, is reduced to "should seek to minimise gas emissions";

p535 015.3 we have gone from "expect all" development on sites found in an area of deficiency in access to nature to incorporate appropriate biodiversity elements" to "expect major" development on such sites to "address the deficiency where suitable and viable";

p538 015.3.3 green corridors are removed as sites of recognised nature conservation ;

p542 15.3,23 Major development proposals on sites that are located in areas of deficiency (such as Hillside) will be expected to address (not alleviate) this "where suitable and viable";

p543 015.4 tree protection is watered down;

2.2.1 (p48) all developments in Merton are required to maximise onsite carbon savings, has been reduced to "should";

2.3.22 (p60) the amendment changes the position from developers making reasonable endeavours to achieve EUI and space heating bench marks to " all reasonable but commercially prudent endeavours..." ;

2.5 we move from Merton "will require" to developers "should" adopt a circular economy approach to design and construction;

2.5 (e) developers no longer have to demonstrate that whole life-cycle carbon saving have been maximised, merely that they have taken "actions to reduce life-cycle carbon emissions";

All of these remove levels of obligation or protection which will be retrograde for the environment, both locally within Hillside and across Merton. The only benefit will be to the developers' profit margins, and the Biodiversity Net Gain provisions are not enough to outweigh the damage. I would therefore like to see these amendments removed.

In my time as Hillside Councillor three areas come up again and again from local residents and businesses, viz

- i) The need for more residential accommodation and footfall
- ii) The need to preserve and enhance what little green there is in the ward, and to protect the environment
- iii) The desire to resist changes which will create a sad, empty centre of windswept tall offices and damage the quality of life for the local community and local businesses.

Whilst there is a need for tall buildings (particularly for accommodation), and the centre of Hillside is already heavily developed, local amenity, the ability of residents to effectively resist damage to their residential areas and locally listed buildings, and important obligations imposed on developers to protect the environment both locally and Borough-wide, will all be damaged by the amendments discussed above.

Best wishes,

