From:

To: Future Merton

Subject: Comments on Merton's Local Plan Main Modifications LBM 29-31

Date: 22 March 2024 11:26:45

To:

future.merton@merton.gov.uk

Please copy to Future Merton Programme Officer

Comments on Merton's Local Plan Main Modifications LBM 29-31

While the latest modifications include some significant improvements on earlier versions, I would like strongly to support the points made by The Wimbledon Society, the Wimbledon Park Residents Association and Cllor Susie Hicks. I will add some specific points below.

Heat pumps etc

MM 29 p 61 New paragraph below 2.4.14

I wish to propose the following slight but significant elaboration (in blue) of the modification proposed by the Council, which is good in itself but not as specific as it needs to be:

Where heat pumps or other similar appliances such as AC units are proposed developers will also need to ensure that living conditions of existing and future occupiers of the proposed development and neighbouring properties are not materially harmed in terms of outlook, noise or vibrations in line with Design Policies D12.3 (g) and D12.4 (g), and Pollution Policy P15.10. Unnecessary visual or noise intrusion on neighbours' houses and gardens should always be avoided or minimised through appropriate location and shielding of pumps and similar machinery and consideration of alternative energy-saving technologies. Protecting the occupiers who benefit from the new energy-saving technologies against such intrusions should never take priority over protecting the neighbours affected.

To ensure that the Plan is effective and consistent with national policy.

[Comment: The somewhat extended guidance proposed would pay handsome dividends in terms of promoting good relations within local communities and reducing the enormous amounts of time wasted by Council and neighbours alike on such cases, especially if accompanied by a new requirement by the Council that developers should inform and consult the neighbours affected and report to the Council on this at the pre-application stage.]

The sections now proposed on tall buildings, including the reduced standards to be expected from developers, are troublesome. While enlightened development must be allowed and even encouraged, and it is probably right to define restricted zones where tall buildings above six storeys may be contemplated, the fears reported by Cllor Hicks that the centre of Wimbledon, and especially the area North of the Railway, may evolve into a sad, empty, windswept centre of very tall offices, especially if towers of 48m or more are allowed, to the detriment of local residents and businesses, are very real ones. The Wimbledon Society has expressed similar fears about the "Croydonisation" of our town centre, and has emphasised the need for the Council itself, duly advised, to develop an overall indicative plan for what might be allowed, and briefs for development in consultation with local groups, rather than allow the centre to evolve as the end-product of piecemeal approvals for massive new buildings. The Council should not repeat the mistakes which have been made in so many other town centres, including central London and Birmingham as well as Croydon.

I believe it would be useful for the Council to include somewhere in these sections a passage along the lines:

The Council is concerned not to repeat the mistakes made in too many other towns and cities of allowing the Wimbledon town centre or other main centres in the Borough to evolve into sad, empty, windswept agglomerations of very tall offices and intends to develop its own indicative plan for what new buildings might be allowed and where, in consultation with local groups, rather than allow the centres to evolve as the end-product of piecemeal approvals for massive new buildings.

Positive affirmations of policy

In a similar spirit, I believe it would be useful for the relevant sections of the Council's Plan to make more positive affirmations or reaffirmations of its general policies in important areas such as these:

To strengthen flooding defences, including serious drainage improvements, and to limit the multiplication of basements and swimming pools, especially in areas built on clay

To give added priority to protection of the historically important conservation areas, areas of special character and listed buildings within the Borough

To continue the maintenance and development of walking and cycling routes and green areas in the Borough

To give priority to the building of extra housing, especially affordable housing, ahead of additions to existing properties which are unnecessary and environmentally unfriendly.

Wimbledon Park

Finally, I would like to support what the Wimbledon Park Residents Association has to say about Heritage at Risk areas and the proposed Landscape Management Plan proposed for Wimbledon Park, based on consultation between Merton, Wandsworth, the AELTC and other landowners and the relevant community groups, as well as the telling point they make about the public trust under which this land is held.

Yours sincerely