

Matter 8: Site Allocations

Victoria Crescent, Wimbledon (Site Reference: Wi11)

Non-Participant Statement on behalf of F&C Commercial Property Holdings Limited (as advised by BMO Real Estate Partners and Stanhope PLC)

September 2022

Matter 8: Site Allocations

Issue (ii): Are site-specific aspects of the Plan's allocations justified, effective and consistent with national policy?

Questions:

Wimbledon Town Centre

5. Would any suggested MMs ensure that the siting and maximum height of tall buildings are grounded in an understanding and evaluation of the defining characteristics of the site and sets out a positive strategy for its surroundings (paragraphs 127 and 190 of the Framework)?

Evidential Justification for Siting and Maximum Heights

- a. Policy D12.6 identifies suitable locations for tall buildings, this includes Major Town Centres such as Wimbledon. Reference is also made to the relevant Strategic Height Diagrams which identify where tall buildings will be considered acceptable within these identified areas and establish appropriate maximum height parameters. Part 1 goes then further to identify, at sub clause (f), specific site allocations (to include Wi11) suitable for tall buildings.
- b. This is compliant with London Plan Policy DP9 (A) and (B).
- c. LBM's evidence base has supported the above identification of locations for tall buildings set out under Policy D12.6. The Merton Character Study (2021) in particular provides an assessment of potential locations for tall buildings. This includes giving consideration to existing local character to include existing built form, typologies heights as well as the historic environment in addressing NPPF190. It then goes on to assess the "suitability" of these locations in accommodating tall buildings against a specified criteria (page 134).
- d. Consistent with supporting paragraph 3.9.1 of London Plan Policy D9, Wimbledon Town Centre is a sustainable location which through the Local Plan has been identified for planned growth at well-connected, highly accessible locations with capacity for optimisation.
- e. The Character Study emphasises that within the town centre there should be a character-led approach in "*stepping up density towards Wimbledon centre*" (page 102). The key principles are then set out on the illustrative 'Wimbledon Growth Theme Diagram' (page 103). A "heat map" is provided at pages 136/137 which factors in a number of the relevant site and area-specific considerations and has in turn identified the whole of the town centre as an important and suitable location for tall buildings. In

particular, there is support for a high density growth strategy around the station - to include Wi11, as one of the largest assets within the Major Centre in its place-making contribution.

- f. This has informed the Strategic Heights Diagram for Wimbledon Town Centre and has been reflected through the site locations (to include Wi11) identified as appropriate for “tall” buildings under Policy D12.6.
- g. It is therefore considered that in compliance with NPPF35 and NPPF190, this is a positive and justified strategy. In accordance with NPPF127, it has been translated from the evidence base into policy to provide clear guidance on the delivery of tall buildings within the Borough.
- h. It establishes the baseline position and parameters. The refinement of which can only come through detailed design development which will be informed by technical impact testing and analysis of the site and its surroundings at the application stage. Hence, Policy D12.6 and the Character Study set out a framework criteria against which development proposals for tall buildings will be assessed at the decision-taking stage.

MM Recommendation

- i. In supporting the delivery of the above, it is recommended that the height reference on the “*Strategic Height Diagram, Wimbledon Town Centre*”, should be in metres only (as per earlier representations also submitted by the objector).
- j. Thus, the amended annotation, within the key, on the above Diagram should read as follows (bold text as new insertion with strikethrough for deletion):

*“Indicative location of tall buildings cluster. **Indicative height range: up to 40m (approx. up to 10 storeys).**”*

- k. This is on the basis that the characteristics (to include ground levels and openings / outlook of neighbouring uses) of individual sites subject to allocations, such as Wi11, will need to be very carefully considered alongside the mix and positioning of land uses that come forward. There will be different assumptions in terms of floor-to-ceiling height across residential, commercial and other town centre uses forming part of mixed-use redevelopment schemes. All factors that can only be considered together comprehensively at the planning application stage.
- l. Therefore, an indicative height parameter in the form of metres rather than specifying storeys, would be positive and sound in providing robust but flexible guidelines for future development proposals.
- m. This recommended modification will ensure positive preparation and effectiveness in accordance with London Plan Policy D9 and NPPF35.