
Dear Future Merton

Thankyou for the opportunity of commenting on the Character Study Consultation Draft SPD.

Please find attached comments on behalf of the Battles Area Residents Association Committee.

Kind regards

BARA Committee Member



BATTLES AREA RESIDENTS ASSOCIATION



Response to Character Study SPD Consultation Draft by Battles Area Residents Association (BARA)

Thank you for the opportunity of commenting on the Merton Character Area Draft SPD. We welcome the preparation of the document as a way of better understanding the distinctive character of different neighbourhoods in the Borough and ensuring that new development is respectful of local context in accordance with the recently adopted London Plan and the draft Merton Local Plan. However, we are of the view that some amendments are required to better reflect the character of our neighbourhood and opportunities for future enhancement.

We set out below our comments on the relevant sections of the document with a particular focus on Chapter E: South Wimbledon. To a large extent these reflect the comments recently made by BARA on the draft Local Plan and highlight again the importance of ensuring that new development protects and enhances local character, strengthens local communities and meets the needs of existing and future residents.

Chapter A: Why Character?

We agree that in promoting development, great importance needs to be placed on protecting and enhancing neighbourhood character. Whilst we understand it is necessary to make the best use of land and buildings, we are concerned that the focus on growth and development may impact on the character and quality of existing neighbourhoods and residential amenity unless carefully managed.

All aspects of local character need to be considered including heritage assets, open spaces and setting. In accordance with Policy D3 of the new London Plan, in bringing forward development proposals, an appropriate form and density of development must be established through the adoption of a design led approach which takes full account of local character and context.

Chapter B: Existing Character

We particularly welcome the focus placed on learning from the past, tackling the effects of climate change and the role of communities in shaping the character of neighbourhoods. We strongly agree that heritage assets should be used to inspire new development of high quality- not to imitate but to sit comfortably alongside and add to the Borough's rich and diverse character.

Chapter C: Merton’s Distinctive Neighbourhoods

We welcome that the Council has taken into account our previous representations and South Wimbledon is now recognised as a distinctive neighbourhood. However, as set out in our representations on the Draft Local Plan, we believe the boundary of South Wimbledon as shown must be amended to better reflect the character and homogeneity of the area. As currently drawn, the boundary cuts through the area covered by the Battles Area Residents Association leaving a large part of South Wimbledon (as recognised by the residents who live here) outside the proposed boundary.

We would like to see the boundary amended and extended to include Haydons Road Recreation Ground, Quicks Road, Wycliffe Road, Ridley Road and Latimer Road.

The amended boundary is shown in red on the following plan extract.



Figure 1: Proposed revised boundary to South Wimbledon Character Area Boundary

Whilst parts of South Wimbledon may have the potential for change, we believe the application of the spectrum of repair-re-examine- reimagine (see page 37) is too broad brushed and fails to reflect the varied character and nature of development opportunities within the Neighbourhood.

The spectrum identifies South Wimbledon as a neighbourhood which has the potential for more comprehensive change. We believe this is misleading and undermines the overall

objective of protecting and enhancing neighbourhood character. It is impossible to categorise a whole neighbourhood in this way. South Wimbledon has a rich and varied character- parts may present an opportunity for comprehensive change but elsewhere the focus should be on repair and improvements or more limited change- but in all cases taking account of local context and character.

We note that South Wimbledon is the only one of the 6 neighbourhood groupings which has not been broken down into character areas. As a result, the Character Study fails to reflect the varied character found within South Wimbledon and we would wish to see this addressed before the Character Study is adopted as SPD.

As with the other 5 neighbourhoods, South Wimbledon should be broken down into character areas so that it is not portrayed in its entirety as being suitable for comprehensive change and to ensure new development is respectful of the character and heritage of the area. In adopting this approach, we believe the Battles Roads should be identified as a separate character area. The area has a very distinctive grid structure of tree lined roads and terraced Victorian and Edwardian properties and this must be respected in any future development proposals in the area. The Battles Roads would sit in a very different position on the spectrum to that identified for South Wimbledon as a whole and offers very different opportunities for intensification and intervention to areas such as High Path and Morden Road/industrial Estate where a greater intensity of change may be appropriate. The focus in the Battles Roads (and other parts of South Wimbledon) should be on repair, reuse and appropriate infill and in order to ensure there is no mis-interpretation of the area definition, this distinction must be reflected in the Character Study.

South Wimbledon does not have a singular character- it comprises a number of different character areas and it is this variety which contributes to the distinctiveness of the area and informs the potential for change and development.

Chapter E: South Wimbledon

Page 52: The description of South Wimbledon highlights the variety of built form and character found within the neighbourhood. Whilst it may be a 'singular' neighbourhood, it does not have a singular character. We welcome the recognition that the Battles Roads are part of South Wimbledon but as set out above, we would wish to see the boundary extended and the identification of character areas to reflect the variety of built form within South Wimbledon.

Page 54: **Distinctiveness**- we would like to see greater weight placed on heritage assets and the refurbishment of existing buildings. Merton High St, Kingston Road, Merton Road and the South Wimbledon junction have a wealth of distinctive buildings which add to the character of the area and these should be retained and reused. Haydons Road Recreation Ground should be included in the list of recreational green spaces

Page 54: **Key issues/ opportunities**- Design Guidance should extend to infill sites to ensure development is in keeping with the character of the historic terraced streets. Opportunities for the enhancement of existing buildings and streetscape should also be highlighted, with

design guidance for the treatment of frontages on Merton Road to Merton High St/Kingston Road (particularly where there may be pressure for the conversion of commercial premises to residential use).

Page 55: The selected photos do not give a full appreciation of the character of South Wimbledon- they tend to reflect the worst parts of the area rather than the best. Photos of the Battles Roads and distinctive buildings at the South Wimbledon junction and along Merton Road and Merton High St should be added.

Page 56: **Growth Themes-** We are concerned that the principle focus is on growth and change in the Morden industrial Area and High Path Estate. There is also a requirement for guidance on smaller scale interventions in the area- the development of small sites and infill and reuse of existing buildings that is sensitive and context led together with the enhancement of the public realm and green spaces.

The proposals map is incomplete and it is unclear what approach is to be adopted in a large part of the neighbourhood, particularly along Merton High St/Kingston Road. In particular, we would question why the 'repair character' designation is applied to areas outside the boundary and not to appropriate areas within South Wimbledon (such as the Battles Roads and other Victorian/Edwardian streets to the north and south of Merton High St/Kingston Road). We would suggest the following changes to the proposals map:

- Designation of the Battles Roads and other Victorian/Edwardian streets for repair and enhancement;
- Extension of the area along Merton High St/Kingston Road as 'Reexamine Character';
- Improve connectivity and extend local green link improvements and access to the River Wandle;
- The regeneration of Merton High St should be identified as a separate Growth Theme to include reuse of vacant buildings and shop front and public realm improvements to create a vibrant focus for the neighbourhood;
- Strategic greening and public realm improvements along length of Kingston Road, Merton Road and Merton High Street as well as Morden Road;
- High Path Estate to be integrated with the wider neighbourhood with improved connections and green links.

Summary

We welcome the preparation of the Character Study and believe it will contribute to a better understanding of local character and assist in ensuring development proposals positively respond to local context. However, we are of the view that further amplification is required to better reflect the variations in character and growth opportunities within South Wimbledon. This should include the identification of character areas within the South Wimbledon Neighbourhood Boundary.

In our view, the focus should be as much on repair and re-examination as on the potential for more comprehensive change in appropriate areas and the importance of improved connectivity and green links throughout the neighbourhood.

South Wimbledon has a rich and well documented heritage and if carefully managed the opportunities for development and change can build on this and add to its rich and diverse character in the future. As the document acknowledges, neighbourhoods are shaped by communities and we look forward to working with the Council and other stakeholders in ensuring future development protects and enhances local character, strengthens local communities and meets the needs of existing and future residents.

Chair, Battles Area Residents Association (BARA)

March 2021