

Planning Division
Environment & Regeneration
London Borough of Merton
Crown House
MORDEN
SM4 5DX



14 October 2020

For the attention of Mr. David Gardener, Case Officer

Dear Mr. Gardener

20/P2567 – Wimbledon Bridge House, 1 Hartfield Road, Wimbledon SW19 3RU

Alterations and extensions to existing building to provide an additional 3 storeys of office accommodation plus plant enclosure at roof level and associated landscaping and public realm improvements

The Wimbledon Society wishes to object to the above application. Our objection centres on the following key areas:

- The proposed height of the building
- The inadequate attention paid to the carbon footprint of the building
- More could be done to enhance biodiversity of the building
- The uncertainty surrounding need for additional office space in the area

The building is situated on a conspicuous site facing the Wimbledon Broadway Conservation Area. The appearance of this area is important to the commercial and leisure activities in Wimbledon town centre. It will be particularly visible from the area around the entrance to Hartfield Road, which directly faces the building, and also the view looking along Hartfield Road. The proposals envisage increasing the height of the building to 10 storeys. The impact on these views is amply illustrated by the Built Heritage, Townscape and Visual Impact Assessment accompanying the application (illustrations 5.8 and 5.14). The view taken by the developers seems (perhaps unsurprisingly) to be that the impact is not particularly great and not particularly important to people in the area. We take a different view. The scale of an already dominant building is significantly increased to the detriment of the area. Existing applications for nearby buildings are not as large in scale as the proposed new building so this building will be seen as over-dominant.

We note that the new storeys are set back from the edges of the existing building. However, as no cross section across Hartfield Road is provided it is unclear how visible the new storeys will be from the pavement opposite, although the proposed east elevation indicates that they will be.

Local people have expressed their preferences clearly at council-run workshops: they do not want tall buildings like this and the 22m coping height of the CIPD building should be the maximum in the town.

As well as the individual impact of such large buildings, Hartfield Road is becoming increasingly overbuilt and 'canyonised'. New buildings in the vicinity are already raising the building heights along this relatively narrow but important thoroughfare (including for pedestrians and cyclists). We do not wish developers to have the expectation that this height will be acceptable in this part of the town. It will make the area unfriendly to pedestrians and increase pollution by trapping pollutants.

The height of the building will also affect the light to the lower floors of the buildings opposite.

We also consider that insufficient consideration has been given to the climate emergency called by the council. It is not clear whether the new building will improve upon the 43 kW/m² design of the original building, or indeed whether the original building meets this standard and needs to be improved.

The new building achieves only 35% carbon emission reductions compared to part L of the Building Regulations. However as the Government has indicated its intention that Building Regs criteria are to be made radically stricter, it does not appear that the proposals are sufficiently 'energy conscious' and much more can and should be done to address this.

We believe that more could be done to enhance biodiversity in constructing this building, especially as the developers seem to wish to claim these credentials. In particular, we note that the ecology report states *'Further enhancement could be achieved by including native or wildlife-friendly planting on the new rooftop once it is constructed.'* [Ecology Report, Recommendations and Conclusions].

We believe that such further enhancements should form part of the plan now rather than waiting until the extension is complete and the enhancements can be forgotten or omitted.

Whether additional offices are needed for the town is problematical, given the independent reports by Ramidus/CAG (2017) and Knight Frank (2018), the latter saying that the "demand in the market place does not support the scale of (office) development envisaged" [by the Council's planning approach]. Additionally, with the recent experience of Covid home working and associated changes, creating additional offices in the town centre (when new housing should be the priority) is again something to be questioned. We have also noted a number of planning applications in the borough requesting conversion of office space into residential.

Finally, we note that the requirement of the new storeys to be light has led the developers to suggest timber structures within the new parts of the building. We would like to highlight the possible safety implications of this approach.

Yours sincerely

Chris Goodair
Chairman, Wimbledon Society Planning & Environment Committee