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25 January 2021

Dear Paul

### **DRAFT LOCAL PLAN 2A: CONSULTATION RESPONSE**

The Society feels that the officers of the Council are much to be commended for producing this Local Plan draft, bearing in mind the very significant limitations imposed by the current pandemic.

The Society has now considered the draft Local Plan, and our detailed comments are set out in the attached Appendix.

Essentially, we consider that the basic thrust behind the Local Plan needs to change, to instead firmly focus on the Climate Emergency and Sustainability. The principal issues we feel are as follows:

- The objectives as currently set out in the new Local Plan need to be re-ordered and allocated new priorities. Top priority must be given to Climate Change, followed by energy, sustainability and the environment, then greening of the Borough, and finally growth/development.
- Development or 'growth' must not be at the cost of losing the character, heritage and distinctiveness of Merton. For example, public workshops clearly indicated local people did not want tall buildings.
- Development should only be accepted if it first meets Climate Change & Sustainability Policies and relates well to local character.
- The plan itself needs to change its whole approach, away from explaining how the Council will **re-act** to proposals from developers, to being more **pro-active**, particularly in order to achieve the transformation of both buildings and transport required to combat Climate Change.
- The currently imposed target of over 13,000 new homes in the next 15 years means that an average of 500 new homes will need to be built per square kilometre in the Borough. Without any clear indication of how this is to be achieved on the ground, this is clearly a target that needs to be reassessed.
- Building of housing should have priority over the building of office blocks.
- We need to see a far greater emphasis on achieving safe and pleasant pedestrian zones and a proper working network of safe cycleways. Through traffic and speeding should have no place in local neighbourhoods.
- Protection of all open space and nature should be paramount and making space for arts and culture would provide a welcome boost to both personal well-being and the local economy.
- A sound and secure energy supply will be essential in the development of infrastructure and should be made robust and resilient in the face of climate change.

The Society's more detailed responses are set out in the enclosed Appendix.

Yours faithfully

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Chair, Wimbledon Society Planning & Environment Committee

cc: Chris Lee, Director Environment & Regeneration:  
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## WIMBLEDON SOCIETY RESPONSE: LOCAL PLAN CONSULTATION

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This Appendix lists the Society's more detailed views, and makes suggestions on a range of issues and policies that we feel could and should be taken on board before the Plan is finalised.

The accompanying letter summarises the broad thrust of the Society's views on the range and content of the Council's draft Local Plan.

It needs to be said that the officers of the Council are very much to be commended and thanked for managing to produce this Local Plan draft, given the very considerable limitations imposed by the current pandemic.

### GENERALLY

We feel that the overall thrust of the Plan needs to be completely re-focussed to deal with the Climate Emergency, and not on "Growth" – which is only another word for "Development".

Both the NPPF and the London Plan seem to have been based on earlier thinking along the same lines, now outdated, with a nod to the more recent Climate Emergency issues "grafted on".

This draft Local Plan seems to have followed the same pattern. We now need a new approach.

Instead, the Local Plan **needs to change, to firmly focus on Climate Emergency and Sustainability.**

So that for example, the Broad Aims of the Plan should start with **adapting to Climate Change first**, followed by **Local Character, Open Space protection, Neighbourliness standards**, and only then about 'Growth' or Development.

To say that all the listed elements have the same priority – as has been claimed in the past - should not be accepted. Instead, the Plan should be clear that now **there are to be priorities.**

As the RIBA made clear recently, ***"The Climate Emergency is the biggest challenge facing our planet, and our profession"***. As someone said, if we do not deal with it, we may not have a planet to live on. There can be no doubt then that the priorities driving the new Local Plan must clearly follow this line.

Similarly, the four Objectives ABCD should lead with C (Climate Change), followed by A (Supporting Resilience), the D (Local Services) and only then B (Growth or Development).

It is important that two elements need to be added to the 'Growth/Development' objectives.

Firstly, ensuring proper standards of daylighting, sunlighting, privacy (the "Neighbourliness standards") which are being routinely infringed by developments.

Secondly, the respect for Local Character.

Unless new development delivers on these, we are simply building ourselves into more problems.

Whilst this Appendix obviously concentrates on what we would like to see changed, several of the aims – reducing energy needs, protecting open spaces, supporting neighbourhood centres, encouraging retro-fitting of standing buildings and so on – are what we would want to see, and are of course supported.

## A PROGRAMME OF WORK AND TARGETS

The Plan follows the same basic approach as before, that is, it sets out the Policies that will be used by the Council when considering proposals for change.

In other words, it is a **Re-active** document, it says how the Council will respond to proposals by others. And it will have an effect on no more than perhaps 10% of the building stock by 2050.

Apart from a list of sites that are likely to be developed, and some traffic schemes, it does not set out how **Pro-active** the Council will need to be.

Given that perhaps 90% of today's standing buildings will still be in place in 2050, the Plan should spell out clear Targets, and a programme of work to achieve the various objectives.

What is to be the pace of change, and the associated mechanisms and initiatives, to achieve the "20-minute neighbourhoods" (Broad Aims & Spatial Vision) by 2036?

Or a proper and workable network of cycle routes (Transport T6.6)?

Or the major energy and insulation retrofitting of several tens of thousands of houses etc (A missing Policy in Climate Change)?

We now need to consider a **new kind of Pro-active Plan** that understands the management of all the Borough's building stock and does not simply sit back and wait for others to suggest change.

## RESPONSES TO THE 8 CHAPTERS IN MORE DETAIL

**1 CLIMATE CHANGE** It is right that this is the lead chapter.

CC8.11 The proposed CO2 reduction standards are seen as (politely) insufficiently robust, noting particularly that the Building Regulations are been described as wholly outdated and inadequate. The quoted cost of c£95 per ton of CO2 (London Plan) seems almost laughably low, when industry specialists are saying that the true cost is probably **in the range of £400-500**. The **non-compliance payments** (where standards are supposedly not able to be met) need to be **set high enough** so that it becomes far more financially attractive to comply than to pay. Some of the development industry is generally thought to take the line that it is often advantageous financially to pay the minimal "fine", whilst designing outdated projects much as before. This must change, and a **more realistic CO2 charge figure embedded in the Plan**.

CC8.12 Again, assuming the 2013 Building/Regs are the right starting point for energy standards, the quoted **10% figure is embarrassingly low, and clearly nowhere near adequate**. Specialists are now saying in public that there is a discrepancy of 60 – 80% between the calculated figures and the real life figures in use. A more realistic figure of **60 – 70% above 2013 B/Regs needs to be embedded in the Plan**.

Ensuring that predicted energy use is delivered in actual 5 year performance is good practice. As developers invariably quickly sell the finished building, they could escape any financial penalties. Should some kind of **deposited bond** be considered? (See the RIBA Post Evaluation Tool 2020)

CC8.13 Optimising roofs as sources of renewable energy is welcomed. It will be vitally important to ensure that new development does not shade out the neighbouring roofs, which could be the source of significant future energy generation via retrofit.

In practice this means that, with energy generation demand peaking at the time that the sun is at its lowest, **protecting sunlighting to nearby roofs should be a major new planning policy** (see also D5.3).

CC8.13 Energy storage, heat pumps, PV etc will all require some kind of publicly funded initiative or incentives, and need (as noted above) to be part of a co-ordinated Council plan.

**Targets and a programme of work therefore need to be an essential part of the new Local Plan**, with the planning system taking the lead. No other part of a Council could realistically run this.

CC8.14 Prioritising retrofitting and re-use before destruction and rebuild is to be commended, for its sustainability. Achieving adaptability in new building is also welcome.

CC8.16 Avoiding single aspect dwellings is welcomed.  
(It would be desirable to avoid the use of “Albedo” in planning documents, a word which few understand).

## 2 PLACES AND SPACES

### D5.1 Tall buildings should not be accepted in Wimbledon Town Centre.

It was quite clear in the public workshops (facilitated by the Council) that local people did not want buildings to be higher than the 6 storey CIPD building in the Broadway (some 22m to the eaves). The Council’s proposals shown in the subsidiary SPD for 12 – 14 storeys **should not be accepted**. Such buildings dominate and do not respect pedestrian scale, create “canyonisation” with a street scale and cross section more appropriate to central London. **That Policy should be changed**. If commercial floorspace is needed, it can be delivered in lower and fatter buildings. The present Policy approach encourages developers, who of course have no interest in the planning of the town.

Merely avoiding the loss of local character and heritage assets is not considered sufficient. There should be a **Policy requirement to positively enhance**.

Additionally, the Council should bring in a **Policy to promote and operate a Heritage Grant scheme**, so that private investment in small scale house improvements can be stimulated, with benefits for the local and small-scale building industry (see also D5.5 below).

Encouraging central government (HMG) to provide basic funding could result in a close to zero net cost to the exchequer (& Council), given the normal receipt of taxation & VAT income from the local building firms that would be undertaking such projects.

D5.2 It should be made clear that development near MOL and defined open spaces should comply with the same standards as for residential, on **privacy distances, daylight and sunlight** protection. Shadowing and overlooking compromise the open space use.

D5.3 Reference to “architectural” forms and content needing to conform could stifle innovative design. It would be better to avoid “architecture” and refer instead to building mass, scale, height, building line and so on, encouraging interpretation by the scheme architects.

The provision of proper levels of **privacy, daylight and sunlight** to adjoining properties including gardens is a highly important, welcome and necessary Policy.

However, currently developers and architects are consistently mis-reading the Policy, by concentrating on the out-dated Common Law approach of “loss of light to nearby windows”.

It is suggested that a **concise SPG should be now produced** that explains the basic requirements. The Society would be happy to provide support on this if needed. (see policy CC8.13 above)

Additionally, the **Policy should include a new element**, the **protection from shading of nearby roofs** capable of supporting a future PV array, given that such arrays are likely to be a major component of retrofitting schemes.

As the maximum requirement for energy is at the time that the sun is at its lowest (mid-winter sun is only a maximum of 16 degrees above the horizon at noon) it is important to ensure that new development does not cast shadows on its neighbours' present or potential future PV arrays.

Whilst the re-statement of the present tree protection Policy is welcome as far as it goes, the reality is that it is not working, and tree stocks are being lost.

There should be a **more specific "Tree Years Policy" about replacement**, where the **combined age of the lost trees is matched by the ages of the replacement trees plus 25%**.

Where the lost trees are "specimens" (whether because of their species, or townscape value, or being covered by a TPO) then the **replacement should be plus 100%**.

Where a site is unable to accommodate the required number of replacement trees, then the surplus should be gifted to the Council for planting elsewhere in the Borough.

The use of the much more complex CAVAT system for calculating the cost of replacements should not be used in the planning system. It is of value only in cases involving costs awarded by the courts. The minimum definition of a "tree" in this context should be a Heavy Nursery Standard with a trunk girth of no less than 14cm. The Society has produced a design guide on this subject.

Additionally, the **Council should establish a tree grant scheme**, perhaps in conjunction with the GLA/Mayor's scheme for "free trees", to encourage new planting.

The GLA/Mayor's view has been that the Borough needs to plant some 800 new trees annually for some 15 years. The planting of 'whips', whilst admirable in many ways, should be calculated as perhaps 50 whips = one tree.

In addition to "Policies" the **Council should produce its Tree Planting Programme** accordingly.

Requiring Flats to have communal amenity space is welcome.

It should be made clear that in addition to embargoing single aspect dwellings, **internal "hotel type" corridors** should have no place in new flats.

D5.4 The Policy requiring the "Respecting" of the original building would be better expressed as **"Reflecting"**, to allow for a more modern interpretation and innovative design.

Similarly, **"complementing" local character** can encourage tame pastiche: making it clear that the primary aim should be to **reflect local scale, heights, building line etc rather than "style"**.

Protection from visual intrusion, noise, air pollution, welcomed. **An SPG** (see D5.2 above) is needed, as the BRE documentation is being poorly/wrongly interpreted by developers and architects.

**Roof additions** and dormers: the present Policy is repeated but the Council's real life decisions are consistently at variance with it.

Rear roof extensions that are full width, full height and flush with the rear wall of the house are now routinely approved. Accordingly, unless there is to be major shift in the decision making, the Council **must decide on one course or another**.

It would be wrong to have a Policy that says one thing, and for the Council to take contrary decisions.

D5.5 The **Council should set up a small scale Heritage Grants scheme** for improvements to Heritage Assets (see D5.1 above). Such small scale and low cost positive action has many benefits.

It gives the Council leverage on the quality of works that would otherwise go through as permitted development. It stimulates private householders to improve their property.

The general public sees the beneficial results, as the exterior of the property is improved.

And it ensures that conservation officers have the opportunity to be pro-active and encouraging, not solely regulatory.

In past experience, for every £1 of public money given in grant, more than £12 is generated from householders towards improving their house frontages.

To allow Heritage Assets to be lost because they are not considered “viable” encourages “evidence” to be manufactured. This so-called “**viability**” **get-out Policy should be rejected/rethought.**

The definition of “Public benefit” can also be manipulated (CIL payments?) to justify losses, and either **needs redefinition** or the policy dropped.

Locally Listed buildings and Historic Parks **should clearly be designated as Heritage Assets.**

And all **should be set out in an Appendix** in the final published document.

D5.6 **Advertisements need to be restricted to street level**, and not be permitted on upper floors: this needs to be made clear.

Agreed that advertisements should not harm trees, but this **should apply to all trees**, not just those in conservation areas.

D5.7 **Telecommunications:** Currently the ugly proliferation of crude cabinets around masts, the stated inability to share masts by operators, the ad hoc submission of individual mast proposals without any kind of overall plan, should be seen as unacceptable environmentally.

The adoption of the Policy as proposed seems unlikely to achieve any improvement.

Instead, the Council should produce, with all the operators, **an agreed design protocol** identifying all sites in the Borough, dealing with the absurd and almost offensive cabinet clutter, the removal of redundant equipment, and respecting the Borough’s environmental and Heritage Assets.

The Council will know of the opposition by some to the whole concept of such technology, but the HMG view is that this is not a matter for the planning system. To compound this with the current crude jumble, seemingly indifferent to matters environmental, is to say the least unfortunate.

D5.8 **Shopfront design** should mention the importance of retaining/replacing/creating the projecting cornice or blind box, which forms the top of the design: its omission (eg c96 High Street) leaves the fascia “bare and unguarded”.

It is noted that this Policy prevents all internal illumination of fascia signage throughout the Borough.

D5.9 Dwelling Conversions should also adhere to the **Policy on Daylighting, Sunlighting and Privacy** that apply to new build (see D5.3 above).

D5.10 On **Basements**, anecdotal evidence locally seems to suggest that when new basements are introduced into properties that are joined with others (semi-detached or terraces), the robust structure of the new work does not relate well to the often more flexible or shallow foundation systems of the neighbouring property. And they suffer movement.

Is there a case for considering whether there should be an embargo on new basements, except under detached buildings?

Should there be an embargo on new Basements under Listed/Locally Listed Buildings?



Setting a 50% figure for extending beyond the building footprint may be problematic for small sites eg terraces. Instead, should basement footprints also be limited to maintain a significant rear garden zone for outdoor amenity, nature, planting, trees, water table etc?

### 3 ECONOMY

EC7.1 It should be made clear that the Policy on jobs growth (ie Development) should only be accepted **if it first meets Climate Change Policies, and also respect for Local Character.**

To sanction “development” for the sake of it, which does not comply with these two essentials, should be seen as perverse and out-dated.

The Policy of “encouragement of **trips to Wimbledon Town Centre**” should be omitted.

Such trips will happen naturally, based on the attractiveness of both transport and the centre.

Such a Policy could be mis-used to justify crude over-development.

The Policy resisting Live/Work units is not justified and **should be omitted.**

Recent experience seems to indicate that working from home will play a larger part in some residents’ lifestyles in the future. The Policy instead should **set out the criteria** that will ensure that neighbours of live/work units are not adversely affected by noise, traffic etc.

EC7.2 Encouraging the **redevelopment of existing offices** should not be an adopted Policy, and it also does not comply with Policy CC8.14 on renovation.

It encourages the unsustainable demolition of recently built buildings, where renovation (generating lower rents that would be more affordable to local firms?) should be preferable. Encouraging refurbishment and adaptation is more sustainable, lessens the carbon footprint, and should generally be the aim.

EC7.2 Resisting the **change of use from office to housing** (or work-place housing) should not be accepted, as long as the proper environmental and space standards are met. Housing is needed, offices probably less so if recent workplace trends are confirmed after the pandemic.

The exception would be to prevent offices set within industrial zones etc (or shopping frontages) changing to housing, causing poor environmental conditions for residents.

TC7.5 The Policy to support new (office) development in Wimbledon Town Centre should not be accepted unless **it first complies with the Policies on Climate Change, and on local character, and is subordinate to Policy CC8.14 on retrofitting existing buildings.**

Is it not likely that demand for offices will reduce as a result of the pandemic, and new ways of working?

It is not explained exactly how the town centre will gain from excessive development, unless it is the Council gaining from CIL payments and increased Business rates. Office workers are present only a few hours a day to support local services, whereas residents are ever-present. We need housing.

TC7.5 Resisting amalgamation of frontages in Wimbledon Village is welcomed, as a “home” for the smaller and more varied businesses that contribute so much to local character.

The same **Policy should apply to the two Conservation Areas in Wimbledon Town Centre.** (N3.6)

TC7.8 The Policy supporting the loss of entertainment and leisure facilities if “un-viable” is not accepted. Without our varied social and cultural and leisure premises, society cannot function. **Policy should instead support their retention and re-use for social/community purposes.**

Once lost they will seldom return.

#### 4 GREEN AND BLUE INFRASTRUCTURE

O8.1 Protection of open spaces is welcomed. **Desirable to add in a reference** to the need to comply with Policy D5.3 on protecting the Daylight/Sunlight/Privacy standards on development sites adjoining open spaces. Shadowing and overlooking adversely affects the use of an open space.

The increasing of tree numbers welcomed, but see Policy D5.3 above on **including a “Tree Years” approach** to replacement, and the need to have **an annual planting programme of 800 trees**. With minor exceptions, one notes that trees over the great majority of the Borough can be felled (or planted) by their owners without permission, nor indeed without needing to inform the Council.

**A new Policy is needed** that recognises the enormous **importance of the back gardens** in the Borough’s ecology and amenity, and the need to protect it from unreasonable incursion by rear garden parking, basements and rear extensions etc.

There will presumably also be an impact on the local microclimate.

O8.2 Protection of both public and private open spaces is welcomed.

The Policy **allowing development on supposedly “surplus to requirements” open land is not accepted**. Any such land should be utilised for alternative open and unbuilt uses, allotments etc. The recent pandemic has illustrated how important open land is for the well-being of individuals.

**The Policy that allows development within open spaces should not be accepted.**

Instead, Policy should make clear that **the only development allowable in designated open spaces is that which enables the better use of that open space** (pavilions etc).

These being the same criteria (NPPF) as used for Green Belt.

O8.3 Payment of a sum into an amelioration fund if biodiversity is harmed should only be acceptable if the sum is set to **make compliance significantly more financially attractive** to a developer than payment.

O8.4 The Policy on tree protection and replacement should **“Require”** not **“Expect”**. And see the **Policy proposals for Tree Years** in D5.3 above.

O8.4 Preventing **the loss of a TPO tree to development** proposals “unless there is public benefit” is not accepted. This “get-out” clause allows for widespread ignoring of the supposed policy, with the definition of public benefit open to many interpretations.

This is seen as a classic case of a policy that may sound good, but is totally ineffectual in practice, leading to a loss of public confidence in the Plan. See instead the approach set out in D5.3 above.

O8.6 **Urban greening should be “Required”** rather than **“Expected”**.

F8.8 “Steering” development away from flood risk sites is dependent on persuasion and therefore likely to fail. Instead the Policy should clearly say **“Prevent” vulnerable development, eg housing on flood risk sites**.

F8.9 The water-based Policies perhaps understandably are aimed towards safety, but there is another aspect that could be explored. The Wandle Trail is mentioned, but there are other rivers that could be seen not just as “threats” but as “opportunities”.

The Beverly Brook along the western Borough boundary is in part set within green zones, and some interesting modifications to control flooding and enhance biodiversity have taken place further down



stream. The Pyl Brook beside the Tesco site and West Barnes Lane is similarly opened out into a currently private green space.

But some lengths are culverted or hidden, where there may be opportunities to open out and make them a local 'blue' feature in the landscape.

This was the subject of an interesting study by the then planning office (PR) some years ago. The Society feels that this is a subject that should be 'dusted off', to see what could be gained environmentally. Opening out culverts generates its own set of issues, on safety, access, flooding, maintenance and so on, but also creates the potential for people to have more contact with nature. Including a Policy that stated that the Council would put such an environmental enhancement project – "**Riverside Trails**"- **into its work programme** would be welcomed. (see N3.4)

F8.11 The suggested Policies set out how Air Quality performance criteria are to be measured/achieved in new development. But this leaves the great majority of the Borough (and its buildings and transport etc) out of the equation. And standards are not being complied with.

For an air quality improvement programme to work Borough-wide, 3 main elements are needed:

- Independent and verifiable information on air quality in **various fixed locations**, placed mainly where air quality is currently below acceptable levels: this needs to be in a time frame so that variation in quality levels are seen in context: moving locations prevents an historical view:
- Regular and independent and verifiable and **publicly available current measurements**:
- A programme of work setting out the **amelioration measures** being undertaken.

Accordingly, a Policy should be included that the Council will not only ensure that new development meets the required standards, but that such **an air quality monitoring scheme will be implemented**.

F8.11 Traffic Noise in some parts of the Borough is significant, and is likely to continue for many years. Major road noise (the elevated section of the A3, Bushey Road, Croydon Road etc etc) blights the surrounding area. Much of the Common (& Mitcham Common) has this unwanted noise. Acoustic fencing is already a commonplace in many countries, and installing these fences where practicable would lessen unwanted noise, and the blighting of the local environment that it causes. A Policy should therefore be included that the Council **will install acoustic fencing** to reduce unwanted traffic noise.

## 5 HEALTH AND WELLBEING

HW2.2 Encouraging allotments is welcome, but the Policy should instead say **Protect and encourage**. Additional pockets of land should be considered for **new allotments**.

## 6 HOUSING

H4.1 Affordable housing is needed, and the intention to merely "Aim" for 50% of new build is not adequate. Instead the Policy should clearly say what the figure is to be, and "**Require**" that.

The payment of sums in place of provision should be set so that the amount is a fair assessment of what would be needed. It is now publicly stated that the land value capture currently being obtained via such policies, CIL payments etc is **only some 30%** of the potential sum. Viability statements are widely distrusted, and only made available to the public when matters have been concluded.

That the measurement is to include floorspace, units and habitable rooms should go some way to establishing a proper balance between the market and affordable components, and is welcome.

H4.2 **The figure of 13,770 new homes to be provided over the next 15 years is not yet properly justified.** It appears to be “handed down” by other bodies for implementation. But there is no indication of how this figure is to be achieved in real terms on the ground.

The same arguments were put forward in past years for “dealing with the growing traffic problem,” where only by increasing road space could the “problem” be “solved”.

**That is not to say that there is not a housing “problem”: there is.**

But in order to be realistic we have to demonstrate what the implications of achieving these figures are on the ground. Exactly in the same way that the Buchanan report of 1963 did for road building, demonstrating, in that case, that one could have the extra road space at the expense of largely destroying (and bankrupting) the centre of London. Or have traffic restraint and management.

For example, the area of the Borough is some 33 square kilometres. The area of the two Commons, and the other big areas of Metropolitan Open Land make up some 8 sqkm, leaving some 26 sqkm in which to accommodate the additional housing in the next 15 years.

These areas comprise not just housing of various types, but major railways, major roads, many smaller designated open spaces, town centres, employment areas etc etc.

Each kilometre square therefore needs on average (some more, some less) to accommodate perhaps some 500+ new homes (13,770 divided by 26).

Taking a sample square (based around the Raynes Park Station) what do we see?

A significant amount of railway land, a section of major road, some designated open spaces, 3 conservation areas, a large area of 2 storey terraces at quite high density.

Assessing the likelihood of new development – conversions forming new flats for example – it is difficult to see how a figure greater than perhaps 100-150 could be achieved in that time.

So what would be the alternatives?

Would there be a need to compulsorily acquire sites, for demolition and redevelopment?

Or would other squares have to accommodate more than the 500 homes to compensate for the shortfall? If so which?

This is not a fully worked out technical study, but the preliminary indication is that **there is a major problem trying to accommodate this amount of new housing**, and the **implications are not shown**.

Accordingly, the inclusion of this high figure in a Local Plan is not yet demonstrated to be practicable, and the public should not be put in the position of being faced with an unexplained fait accompli, where they do not know what they are signing up to.

In the same way that the then apparently insoluble “traffic problems” were dealt with in other ways, so should the “housing problem” be approached.

H4.7 Restricting the size of ‘**Build to Rent**’ development is not justified & should be omitted.

## 7 INFRASTRUCTURE

IN16.1 **High speed telecommunications** should be facilitated only if they comply with the approach and comments set out in D5.7 above.

IN16.1 **Electrical energy** is going to be a key driver in the future, and its protection should be paramount. It should be noted that at least two of the major electrical installations appear to be in

flood risk areas (Plough Lane, Staples Corner) and it would be essential that these are made fully resilient.

Additionally, the **existing pylon network** was presumably established when it was thought that the edge of London had been reached. Today such structures and wires are seen as an anachronism in a modern city. Is there not now a case for taking this major electrical supply cabling underground?

IN16.2 Resisting the loss of **community and social uses** is welcomed, but acceptance of their loss if “unviable” should not be accepted. See notes on TC7.8 above.

IN16.2 As there is no distinction between state and private schools in planning terms, the loss of any **school lands** should be resisted. Noting that new housing needs new school places.

IN16.2 Extension of school lands to bring such sites up to an acceptable standard should take precedence in any land use allocation across the Borough, eg in the Western Raynes Park area.

## 8 TRANSPORT

T6.5 “Improving walking links” should be accompanied by proposals to **pedestrianize or semi-pedestrianize areas in both Wimbledon Town Centre and the Village**. A comprehensive **Borough-wide cycle network plan**, showing proposals for both new and improved routes is needed.

T6.9 In addition to existing transport lands being used to “improve accessibility” it should be made clear in the Plan that such **publicly owned land will be used primarily for socially beneficial purposes**, and not purely for financial gain. This approach would demonstrate to the development industry that the Council/TfL have (and expect) high standards, and are using their lands responsibly. The same approach should be used when developing publicly owned non-transport lands.

The Council’s welcome and innovative approach to the **designation of School Streets** needs to be followed up with a clear transport-based Policy that takes the concept further.

The development of what now are called **Low Traffic Neighbourhoods**, with the full co-operation and involvement of the local public (and the emergency services etc) in the important pre-design and then experimental stages, needs to be part of an outward looking transport plan.

Better communication in advance is clearly needed. A Policy is therefore needed to support this.

**SUSTAINABILITY APPRAISAL:** *No comment is available: access to the material was not possible.*

## 9 WIMBLEDON NEIGHBOURHOOD

The Key Objectives: these need to be revised and re-ordered.

Encouraging development to support businesses and attract visitors should not be accepted.

With the kind of over-dominant development that the Council has in mind, visitors are unlikely to benefit. Croydon-isation is unlikely to be seen as an attractive draw.

Instead, the objectives should read:

- A **Sustainable Town** centre: Incremental change to a zero energy and sustainable locality, driven by Climate Change goals
- Conserving **Character**: maintaining a unique character, built form and scale
- **Greening**: Requiring exemplary design and landscaping, street scene, public realm
- A **vibrant** centre.

N3.6 Encouraging development etc but SUBJECT to **buildings being no more than 6 storeys** high, and Local Character being respected.

**“Taller buildings” not accepted:** see above: there should be a **height limit of 22m to the eaves**, unless within the Conservation areas, where the height would be lower.

Redevelopment of recent/modern buildings should not be accepted, being unsustainable. Instead, there should be a clear **encouragement of renovation and adaptation**, more suitable for local businesses, with lower rents, and in tune with sustainability goals. (See TC7.5)

New Policy needed to **prevent amalgamation of units** in the Town’s two conservation areas, repeating the policy for the Village – see TC7.5.

Promoting places for people to meet is welcome: This general sentiment should be evidence by a specific commitment to move **towards pedestrianizing part of the Broadway**, as evidenced in the Council’s own “mini Holland” scheme submission of 2013, and the Society’s publication Vision 2040.

For the Station redevelopment, it should be a given that **the Tram Stop must be inside the Station**, and not relegated to an outer site like Hartfield Road.

## WIMBLEDON VILLAGE

Maintaining unique character and built form and scale welcomed.

Include the **semi/pedestrianization of the western arm of the High Street** (managing events etc so as to respect local interests).

Should encourage the **proactive and incremental change towards a zero energy and sustainable locality**, in line with the Climate Change agenda.

Promote a **heritage grant scheme** for small scale works to residential property in the conservation areas (see D5.5).

A Policy approach is needed to bring about the **“20 minute neighbourhood”** (see Broad Aims chapter).

The support for the AELTC developments on either side of Church Road should be dependent on **having a co-ordinated plan for the whole of the Wimbledon Park lands**, that will resolve the issues around changes to the historic landscape concept, the lake and its safety, new golf/tennis facilities.

## WIMBLEDON SITE ALLOCATIONS

Wi 1 Battle Close: Council owned: expansion for the nearby primary school?

Wi 2 Broadway Car park adjoining Theatre: Council owned: an opportunity for the nearby **‘Art School’** to establish a foothold within the town centre? Adjunct to Theatre.

Wi 3 **AELTC lands:** see comments above

Wi 5 Hartfield Road car park: Council owned: a major opportunity to create a **Music Centre and performance space** of both Borough-wide and possibly national significance?

Wi 6 165 Broadway: redevelopment not in accord with Policy CC8.14 (renovation) and taller building not accepted

Wi 7 Ravensbury Terrace: housing on flood plain not in accord with Policy F8.8

Wi 8 South W Underground Station: TfL owned: Listed: reducing the elevation (see Morden) not accepted:

Wi 9 28 St George’s Road (Community Centre site): Council owned (not mentioned): tall building not accepted: a replacement of the lost **Community Hall** is needed.

Wi 10 28 St George’s Road: taller building not accepted

Wi 11 Victoria Crescent/Piazza: modern building should be renovated not demolished: Piazza

shape is now part of the town character and needs to be kept: conservation area frontage (why not mentioned?): route through is a public highway and should be kept: taller buildings not accepted: Boulevarding/widening of Hartfield Road and re-routing of through traffic should allow pedestrianizing of part of Broadway:

Wi 13 Sainsburys Worple Road: taller building not accepted: opportunity for public cycle and foot path through site: tree lined Boulevard (says Council) on St George's Road.

Wi 15 YMCA: See Wimbledon Society letter on emerging scheme consultation.

Wi 16 Centre Court shopping centre: Two listed buildings and conservation area: renovation needed instead of redevelopment of a modern project (policy CC8.14): essential new **bridge across tracks** is widened: space to be provided for accommodating **Tram stop** inside station: taller buildings not accepted: noted that no development has yet been identified to pay for the adjoining supposed 'town square' over the tracks.

## 07 RAYNES PARK

Objectives need to be rethought: as set out for Wimbledon Village above (09): Climate Change being first, then Character, then the '20 minute neighbourhood' then travel.

N3.4 Need to spell out how the '20 minute neighbourhood' will be implemented

Additionally: safeguard lands for a **new Station** (further east?): need proposals for creating some improved pedestrianised areas, and better links between the two shopping areas.

## SURROUNDING LANDS

Need an overall Plan to tie these many sites together in their locality, particularly to establish **new public pedestrian and cycle routes**, LTN's, vehicle access, opened out watercourses set in **green space corridors**, **school expansion**, and integral 'school street'.

## RAYNES PARK SITE ALLOCATIONS

RP 2/3 Tesco site and Burlington Road: Primary school expansion: secondary ditto across river: existing public footpath re-designed/re-aligned and new cycle path all linked through to

RB Kingston/New Malden: acoustic barrier to western traffic noise: public open space (other open lands locally not being public): pedestrian/cycle path swept under railway to avoid level crossing, with realignment of WB Lane accordingly:

Pyl Brook opened out as a public green way walk and under A3 to Rugby/Golf Range lands.

RP 4 Bushey Road: Traffic noise barriers needed to west and south: expansion of adjoining school: play area to serve housing estate to north: Pedestrian/cycle link under Bushey Road linking to High School, Bodnant Gardens.

## 08 SOUTH WIMBLEDON

Key Objectives: New Objective should include **the re-routing of through traffic** now in Merton Road via Merantun Way, to create a more pedestrian-friendly zone, with cycle path, plus local traffic, buses, parking: helps shopping zone, and reduces air pollution around pedestrian areas: bus/rail station interchange improvements:

New Objective to promote the "20 minute neighbourhood" concept.

NE.5 Add new Policy that the publicly-owned sites would be utilised for socially beneficial purposes, and not solely for merely commercial advantage in the short term.  
Planning policy on publicly-owned sites should not be driven solely by estate agent thinking.

**04 COLLIERS WOOD**

N3.1 There is a need for a detailed and imaginative SPD illustrating how the significant changes that are being proposed will fit together, and make a coherent community and local centre.

The opportunity created by a future redevelopment of the large existing shopping complex, linked to major archaeological content, the river, and the possible re-routing of the through traffic mentioned above, again suggests that a future planning scheme would be highly desirable.

CW 1 Baltic Close, High Street: impacts on the Scheduled Ancient Monument, in a Conservation area and Archaeological Priority area: beside an entrance to the open space, near a SINC and Green Corridor, within a flood prone zone:

CW 2 Britannia Point: Roman road to be respected: Council/TfL ownership allows total control of any future development: local road system appears incoherent: see Society letter of 12/20 for a way forward. A Council-as-owner-led competition between developers should be considered.

CW 3 Community Centre: use needs to be retained on site, creating a focus for local people.

CW 4 Underground Station: Listed and in conservation area: traducing such a building (eg Morden) to be avoided by design competition (see CW2), and retention of freehold ownership by TfL.

CW 5 Priory Retail Park: beside the Pickle Ditch, with opportunities for green space and opening out, noting listed walls.

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