

INTRODUCTION

The Council is to be commended for managing to produce a plan in what must have been very difficult working conditions in these 'Covid' times.

The Society has contributed in some detail to the Council's earlier consultation drafts.

In our comments on the January 2021 version we said that *"we feel that the overall thrust of the Plan needs to be re-focused to deal with the Climate Emergency, and not on 'Growth' – which is only another word for 'Development'.*

Generally, this is still our view. What we now have before us is mostly the traditional Development Control-centred plan. It defines how the Council will respond to proposals from developers.

Whilst there are references to the changes that are emerging as a result of society's responses to the pandemic, and to Climate Change, this has not been sufficiently reflected in the ideas behind the Plan.

New development will change only perhaps 5 – 10% of the Borough's building stock by 2050, so the 90-95% of today's standing buildings will still be around then.

There is not enough understanding of the role of the Council in promoting and running the retrofit of most of today's buildings, to meet Climate Change challenges.

Where is the re-thinking of transport? Pedestrians in our town centres still have just "the space left over after traffic", with noise, traffic danger, fumes (at a level that fail to meet the set standards).

There are proposals for cosmetic paving and planting, but the Council's imaginative approach in recently establishing school streets for example, is not matched by creative thinking and proposals around pedestrianised space and cycling.

The operative word is proposals: slogans and policies are all very well, but we feel that we should move on from the old style rather static plan, and have a more proactive and imaginative approach.

There is also no real anticipation of the quite major changes to the operation of the Development Control system that are being promoted by central government (HMG) with Design Codes (NMDC).

These are to be "Sets of graphic instructions for building a place". (Brodsky 9/21)

Their scope covers primarily building context, building form, nature, daylight etc, and designing to avoid later retrofit. (Brodsky 9/21)

The Plan is far too long. Or, perhaps rather unkindly, to use the approach followed by the writers: The Local Plan document is also surely unreasonably, unconscionably over-long, with unnecessary repetition, and would benefit from both radical text reduction and pruning.

Given the restricted time for consultation, and the limited resources available, our comments are limited to putting forward **proposals for changes** to the Plan.

As the Plan document has obviously been put together from different hands, to aid proofreading, we have also included a separate list of some of the items that seem to need correction.

The Society's **proposals for change** are **shown in heavy type**, with the reasoning in normal text.

DETAILED COMMENTS AND PROPOSALS FOR CHANGE

P28 Urban development objectives and vision.

Good to see the first strategic objective is tackling Climate Change.

P28 Suggest amend (d) “Promoting circular economy to ensure that resources **INCLUDING STANDING BUILDINGS** are kept in use to consume fewer resources, minimise waste **AND LESSEN WASTEFUL DEMOLITION**”.

P30 Strategic objective 4 should instead read **SUSTAINABLE** growth not “good growth”. Growth is only another term for “development”.

Demolishing recently constructed buildings is not sustainable, if they are adaptable (see RIBA 5/21).

The use of “Good” encourages development for its own sake, and substituting “sustainable” ensures that wider planning aspects are considered.

P34 Strategic policy **CC2.1** concentrates only on new development and omits retrofit.

Only some 5 – 10% of buildings in the Borough will be built between now and 2050, so the plan should move away from the narrow and traditional confines of Development Control, and embrace programmes of environmental enhancement, and the retrofitting and adaptation of the building stock that is already with us now.

We need to see a new type of holistic plan, not repeat the past rather limited planning vision of deciding how to react to applicants’ submissions.

Town planning is far more than development control.

The Council will itself have to take on the role of driving forward the programme of work for not only retrofitting, but also for environmental improvement works and grants of various kinds.

As some of the retrofitting work involves the planning function, the lead role could be taken by the Council’s planning service, backed by the Local Plan.

So one needs an additional policy at **F**:

“Additionally, the Council will actively promote and co-ordinate a range of retrofitting programmes, to bring all existing housing and other buildings up to energy efficient standards”.

P43 CO2 reduction : The proposed figures for CO2 reduction are based on the long outdated 2013 Building Regulations figures and should not be accepted.

The Borough in 2003 won many plaudits nationally for introducing the “**Merton Rule**”, which set standards for energy that were well in advance of the thinking of the time.

The approach was later taken on board by other Councils and HMG.

The Council now should be taking a much more pro-active stance, and **the minimum (which will then become the developers’ norm) figures should be set at a significantly higher level.**

Some independent Industry specialists are saying publicly that the **true figures should be at least 80%** for both residential and non residential.

And noting that “Much new housing is **using twice as much energy** as originally predicted” *.

And energy efficiency “Is not a bolt-on activity”*.

* (Professor Fionn Stevenson of Building Performance Network 9:2021).

P43 CO2 reduction: The carbon offset fund figure of c£90/ton is again far lower than the independent assessments by industry specialists: **a minimum of some £600/ton is instead being quoted.**

As an example, a local case in 2021 where a block of 50 new flats pays just £35k into the offset fund encourages low standards, old fashioned design, and the payment of derisory figures to avoid doing it well. And leaving the eventual retrofit to others. If the figure had been a more realistic c£250k, it could well have been cheaper for the developer to build to the enhanced standard.

Where is the sense in building something that soon needs significant upgrading?

“The Council should adopt a new “Merton Rule” amelioration fund figure of c£600 per ton”. Page 2

P42 Zero Carbon Targets: These take no account of the carbon released by demolition, only of new construction. Instead, all significant development applications should be required to account for this, which would discourage wasteful demolition of buildings that could be renovated.

An additional policy is proposed at F:

“F: Calculations of projected carbon emissions should include not only the construction of the new project, but also those arising from any demolition involved”.

Additionally, as the zero carbon house is currently classed as Code 5 a new Policy at G is needed:

“G: All new housing should be designed to be zero carbon (Code Level 5) from the outset”.

P50 Minimising energy use: as has been explained above, Policy CC2.3 (I & ii) should have a figure of **60-80% above the long outdated 2013 Building Regs**, and not the derisory 10 or 15% quoted, which encourages old-style design, and inadequate construction to continue as before.

And it is known that it is far more expensive to retrofit than to build to the higher standard.

P51 Monitoring energy use post occupancy is to be commended.

But as developers will have long departed, having sold on, there needs to be an incentive to ensure that the calculations provided at the planning stage are matched by the real results over time.

(They bear no resemblance currently, according to independent industry specialists).

So add: **G: “The depositing of a significant developer bond will be required before the building is occupied, redeemable only when the building in use matches its energy predictions after 3 years”.**

P57 **Policy CC2.4:** Photo-Voltaic (PV) panels mounted on roofs are playing an increasing role in generating electrical energy, in both new and existing (retrofit) buildings.

In mid winter, (when the need for electrical energy is greatest) the sun rises in the south east and sets in the southwest, (London latitude, roughly a 90 degree arc) and is only a maximum of 16 degrees above the horizon at noon, and that for only a short time.

Such panels cannot function if they are in shade.

It is therefore imperative that new development does not cast any shade onto any adjoining roofs.

This is not yet covered in the BRE document on Daylighting and Sunlighting.

Accordingly a new Policy is required.

At B add (vi): **“No new development must cast any shadow on nearby southwards-facing roofs on which PV could be installed, to prevent over-shadowing, which prevents PV panels from working.**

The Council will produce a basic Design Guide accordingly.”

The practical effect of such a policy would be to restrict the height of new building so that an angle of about 5 degrees taken from the neighbouring south-facing eaves line is not breached.

P57 **Policy CC2.4** The suggested policies A and B are only applicable to new development, and fail to address the 90% plus buildings in the Borough that will need to be retrofitted to reach optimum energy standards.

Other urban Councils (eg Nottingham: Wayne Bexton) have set up programmes to reach net zero (by 2028 in that case) to accelerate their projected general slow decline in CO₂, and there is a need for this approach to now be included in the Plan.

Should add therefore (C): **“The Council will promote, facilitate and co-ordinate the retrofitting of energy generation, storage, and energy saving in existing buildings.**

Additionally, the Council will establish a programme of work, covering Industry, Transport and Domestic Property, to ensure that the Borough reaches net zero by (say 2030?).”

P68 **Policy cc2.6.** Developers currently mis-use the Daylighting and Sunlighting standards set out in the BRE document, and only demonstrate the effect of the new development on the light reaching the windows of nearby buildings.

This is despite the existing (and projected) Merton Plan Policy that specifically says that daylighting to “gardens” will also be protected.

This old regressive “Common Law” approach now being used by developers is of low standard, and was rightly set aside in the 1950’s when new planning standards were introduced, based on **protecting levels of light reaching the site boundaries of adjoining property**, not just windows.

These are established using either rule of thumb struck angles, or calculated using protractors.

A more specific policy is therefore desirable to get back to those proper early standards.

Add new policy after B: **“Requiring all development to protect the natural daylighting to adjoining gardens, lands and buildings, by ensuring that a 43 degree light angle* to adjoining site boundaries is maintained, and a 25 degree light angle* is maintained from opposing windows.”**

(* these are measured from the top of a 2m high notional fence on the site boundary, or 2m high from an opposing window. See for example figures 3 and 11 in the BRE publication of 2011).

MORDEN

P201 Site Mo4

Whilst Morden is generally regarded as being outside the Society’s main area of interest, as an important town centre it is hoped that the Council’s Plan will form the basis for a better future.

Heavily dominated by traffic, with large open areas that seem wind-swept and pedestrian-unfriendly, there is a need to have an imaginative and creative approach, one that is not dominated by the short term interests of individual landowners, nor of traffic.

The presence of an important station terminus (shortly approaching its centenary) and with its large bus hub, acts as an important focus.

RAYNES PARK

P220 **Policy N6.1:** The present station is not suitable for a modern rail network, and needs both a rebuild and probably a relocation. The potential for radical improvement presented by the Crossrail 2 should be planned for, and **land for the future station** (further eastwards) **should be safeguarded** (see Table 16.1). Add to (F): “...that new structures are **sensitively located**, designed and compliment the wider residential area....”

P227 **Site RP2:** **This should be taken into site RP3**, both being in the same ownership.

This would simplify the replacement for the existing east-west public footpath across the site, and **the creation of a new public cycleway** with the attendant links into the adjoining areas.

Providing land area for **the expansion of the adjoining Primary school** should be included as one of the uses.

Additionally, although the current use is employment, it would be preferable to concentrate the non-residential uses along the A3 (on the RP3 site), allowing the Burlington Road frontage, with its school etc to be primarily residential.

“Focussing” the residential towards the Burlington Road frontage, with its existing local shops, would chime with the “20 minute neighbourhoods” approach mentioned in the Plan’s Transport section.

P233 **Site RP3:** The reference to the site being suitable for taller buildings should be qualified, as the wider area is generally of low height.

Add: “...which could **contain some higher buildings, but limited to 5 storeys**.”

Additionally, the Pyl Brook runs along the northern site edge, and given that the site is both “deficient in nature” and lacks public open space, **a public green space alongside the watercourse** should be incorporated, **able to accept flooding surcharges if required.**

Additionally, the heavy noise from the A3 already blights the wider area.

Accordingly add: “The design of a**future development should place a (largely non-residential) building mass alongside the A3, thereby creating a noise barrier and creating a quiet hinterland within the site.**”

Network Rail has indicated that the adjoining level crossing is of concern, with frequent closures being required to accommodate the train movements, as well as the potential for accidents.

If the level crossing is to be replaced in some form, then it is possible that a portion of the RP3 site could be utilised.

Accordingly, the “list of future uses” should **include “A portion of the site opposite the level crossing may be required to allow an alternative road/rail design”.**

P240 **Site RP6:** The development of the northern portion of what was a much larger defined open space site was only agreed on the clear and public basis that the remainder (now RP6) would be kept as open space.

This should remain the position, and on no account should there be any further loss of this open green land to development. Therefore **Add** the following:

“Should the present owners not be able to maintain this open land, the Council will consider leasing or acquiring it, and utilising it for allotments, tree nursery or other ‘green’ public uses.”

P255 **Policy N7.1 SOUTH WIMBLEDON**

Policy (A) for creating “a new local centre” is welcomed, but does not address the principal and highly destructive local issue of the constant through traffic, which brings nothing to the centre other than noise, danger, fumes.

The Plan’s intention to improve shopfronts and paving etc is welcome but essentially cosmetic, and can only do so much, whilst the major environmental problem remains unresolved.

The buses and local service vehicles bring in people and goods and should remain, but the opportunity exists to re-route all through traffic via Merantun Way.

Accordingly, the following should be added:

“..... Merton High Street meet. **In order to create a more attractive centre, through traffic will be re-routed via Merantun Way, leaving only the bus services and local service traffic in what will then be a largely pedestrian-dominated centre”.**

P267. **Policy N9.1 WIMBLEDON TOWN CENTRE**

It would be fair to say that there is a fundamental difference of approach between the Council and the Society as to the future plan for the town centre.

The Council believes that its Development Control-centred approach, with more “growth”, more offices, higher buildings, and improving local placemaking is the model to follow.

The Society on the other hand feels that a more holistic approach to town management is needed, with an emphasis on responding positively to Climate Change.

Rather than more offices, we need more housing. Rather than “growth” (which often involves pulling down recent buildings) we need more adaptation and renovation in a mixed use town.

That building heights should be no more than around 6 storeys maximum, as local people in Council-run workshops have consistently called for. That more pedestrianisation of the centre is the key to keeping people in the centre longer, and so creating an adaptable and resilient town.

The Council's approach is set out in its **town centre SPD**. The Society's approach is set out in its publication '**Vision 2040**', produced in 2018. **A copy is enclosed.**

P267 **Policy N9.1**

(B) Gives too much emphasis to development for its own sake, and should not be accepted. Responses to Climate Change are suggesting a less aggressive approach, with the emphasis more on the adaptation and retrofitting of existing buildings.

The emphasis on large new office development is seen as misplaced. Office workers and their working patterns are not what they were at the start of this plan-making process.

Office workers populate the centre at very limited times, residents by contrast are ever-present.

Instead the first sentence should be omitted, and replaced with: **"Encourage development that respects local character and the pedestrian scale, attracts new residential and mixed uses, together with business, visitors and tourism"**.

(C) This approach in the Plan relies on an essentially cosmetic approach, which does nothing to improve the air quality, traffic noise and danger experienced by pedestrians in the heart of the town. It is clear from many examples that a well-designed centre has to be attractive to pedestrians, and encourage them to stay, not merely "shop and go".

The present town centre is dominated by traffic, with pedestrians given the space left over. Perpetuating this out-dated town centre model (with better paving) should not be a plan strategy.

The Council itself in 2013 produced a scheme that was seen as a first step to removing through traffic from part of the Broadway, but this failed to get funding support from TfL at that time.

This approach should be re-visited.

Instead (C) should read: **"Enhance the town centre by progressively removing the through traffic from the heart of the town, with its traffic danger and fumes, and create a largely pedestrianised centre."** The possible sequential steps to achieve this are set out in Vision 2040.

(E) Local public views (in Council-run workshops) are consistently clear that buildings over the height of the CIPD building (22m to the eaves) are not wanted. Setting higher buildings away from the historic core is welcomed, but the interpretation of the "higher buildings" in the Council's SPD is not accepted.

Such buildings stimulate too much development and introduce a scale that is not wanted.

Limiting future heights to no more than 22m (away from the historic core) still gives significant opportunities for increasing floorspace.

Instead (E) should have an additional phrase: **"Any such taller developments would not exceed 22m to the eaves"**.

(G) The evening and particularly the night-time economy is part of a centre, but with residents living so close by, it can be highly disruptive. Accordingly, it needs to be made clear that such activities are only possible when they are both suitably located and time limited.

So add an additional phrase: **"..... and community uses, subject to being subservient to residential uses and amenity"**.

P268: (H) The reference to the Council's SPD on the town centre is not accepted. It is considered to be outdated, & fails to learn from the social changes generated by the pandemic. It promotes over-large development of the wrong kind, lacks creativity, and fails to enhance the pedestrian experience. It also perpetuates the domination of the centre by traffic. It is also not appropriate to imply that this Plan is in any way subordinate to the SPD: it is the other way round.

The reference to the Future Wimbledon SPD should be removed.

P269: (Q) As written, this could give the AELTC a green light to develop their newly acquired open lands to the east of Church Road. These lands however are zoned as Metropolitan Open Land (MOL) and should therefore not be built on.

Additionally, they are part of the great landscape Park designed by Capability Brown in the late 1700's, and are designated by Historic England as a Listed Historic Park, grade 2 star.

A recent planning application by the AELTC for substantial new buildings on that land is being strongly resisted by those who consider that the land 'zoning' should preclude any such development. (See also P282 site Wi3 below).

Accordingly, this should be re-written to read: ".....support the upgrading of the AELTC's facilities **whilst maintaining the unique heritage of the open parkland, being part of the Capability Brown landscape, and with its MOL zoning**".

The Raynes Park reference remains.

9.1.2 As has been explained above, the Council's SPD is not now considered to be the model for the town's future, and needs significant revision. **Reference to it therefore should be dropped.**

The five 'priority' elements are well-meaning, but are essentially aimed at new development with its attendant "Development Control" approach, accompanied by some essentially cosmetic re-paving and planting.

Instead, the emphasis needs to go wider. Positive adaptation and upgrading of much of the building stock, introduction of more housing, improving the heart of the town for pedestrians by progressively removing traffic, lessening the importation of gas-driven energy, flexibly managing and encouraging the interaction between 'shops' and the new pedestrian areas.

P271 9.1 6 the reference to only "moderate increase in heights" is misleading.

12 and 14 storeys are being touted, totally against the clear wishes of the public at the Council-run planning workshops, who were clear that that 6 storeys (22m to the eaves) was to be the maximum, and lower in conservation areas.

Independent Studies are showing that housing of 4/5 storeys is more efficient in energy terms than those of 10 storeys and higher*.

Also that offices of 10 or more storeys used 75% more electricity per sqm than those of 5 storeys or under**. (* Smith & Gill 11/20) (**UCL Energy Institute 2018).

Accordingly, add: "..... ..moderate increase in heights **up to a maximum of 22m only in some places away from the historic core.**".

9.1.11 The imperatives of Climate Change and Sustainability are encouraging more emphasis on renovation and adaptation of buildings, rather than the more simplistic past approach of redevelopment. (see RIBA 6/21).

Contrary to what is being implied about buildings from the 1960's, their basic structure is often in perfectly good order, and can be retained and adapted, perhaps with new facades and services.

The true reason for much redevelopment is not obsolescence, but the opportunity to put more floorspace onto the site.

Accordingly, **OMIT** “usually built since the 1960’s and nearing the end of their useful life”.

P273. 9.1.20 The emphasis on attracting major offices is misplaced.

The principal need is for mixed uses and more housing, not more offices.

The latter bring in outsiders who are active in the centre for a very limited time in the day, and have very little allegiance to the locality. By contrast, the new residents are linked to the centre permanently, and support a far wider variety of activities. And bring life at weekends.

This should be rewritten (third sentence): “.....along the Broadway. **The Council will support the refurbishment or development of mixed uses, residential and some offices**”.

P273/4 9.1.24 Needs re-writing: “.....It has a rich heritage **of listed and period buildings with a unique character, with Wimbledon Common nearby**”.

P274: 9.1.26: The existing paragraph 9.1.26 understandably sets the scene, but there is an opportunity to identify a **positive enhancement** that the Council is already exploring.

Suggest a new paragraph at 9.1.26A:

“With a relatively busy road through the Village, space for the pedestrian is mostly limited to pavements. However, the opportunity to semi-pedestrianize the western arm of the High Street could provide more space, increase footfall, and allow a wider range of outdoor facilities to take place on the important route linking the Village and the Common”

P275: 9 1.35 AELTC This could be interpreted as being supportive of the current AELTC proposals for the introduction of substantial new buildings on their newly acquired lands to the east of Church Road. This would be totally against both the MOL zoning and the open-ness of the Historic Parkland.

Suggest the addition of: “..... in site allocation Wi3,**whilst recognising the importance of both the MOL designation, and the unique heritage of the open parkland, being part of the Capability Brown Landscape**”. (See P269Q above)

P276: The boundaries of the AELTC sites identified as Wi3 do not match those shown at page 282. Site allocations Wi 9, 10, 13, 14, form a cluster around Worple Road and St George’s Road, but the summary map shows only sites Wi 10 and 13. **Sites Wi 9 and Wi 14 should be added to the map.**

Opposite these sites there appear to be definite proposals to develop St George’s House East, so should not **St George’s House West and East now be added to the site allocations map?**

P277 **Site Wi 1 Battle Close:**

Being in the Council’s ownership, there is an imperative to utilise this site for social and community benefit, rather than (in the case of privately owned land) for profit.

As the site adjoins a Primary School, playground space expansion should be actively considered.

HMG is currently promoting self-build, and requiring Councils to identify sites.

One possible ‘model’ would be a short terrace, where the Council would specify the basic building line, eaves heights etc that had to be followed, and each site purchaser would then have to design accordingly. Such a model has been used successfully, and the end result has merited awards.

Accordingly the site allocation description should include: **“Expansion of the adjoining primary school site: also the provision of a terrace of Self Build housing”**.

P280 **Site Wi 2: WTC Broadway Car park:**

The site being in the Council's ownership, there is the imperative to utilise it for social and community benefit, rather than (in the case of privately owned land) for profit.

As the site adjoins the Listed Theatre, also in the ownership of the Council, it is expected that the Council would wish to retain the freehold, and dispose only of the lease.

Three additional potential uses should be included.

Firstly a **Public Hall**, able to be linked to the Theatre as required, for exhibitions, community facilities, weddings, performances.

Whilst not a full replacement for the Town's Civic Hall (demolished in the 1980's to make way for the Centre Court development), and noting that the then Council's firm promise for replacement has never materialised, this is an opportunity to add another dimension to the Arts and performance scene locally.

Secondly, whilst the Council has rightly sought to start up a town-centre-wide CHP scheme, the identification of a **central energy site** is still awaited. This Council-owned site should be considered.

Thirdly, the **College of Arts** (a constituent College of the University of Arts London, together with Chelsea, Saint Martins, Camberwell and others) is a well known and long-respected institution, that has its campus nearby. But it lacks a presence in the town itself.

Both the Town Centre life and the College life could gain if part of the site was established as an '**Arts outpost**'.

Accordingly, **the list of potential users should include, energy centre, public hall able to be linked to the Theatre, and a College of Art adjunct.**

P281 **Site Wi 2: WTC Broadway Car park:** The proximity to the Listed Theatre should mean that "taller buildings" should not be seriously considered on this site.

To make a general point: As the Local Plan, when approved, is a superior document to the town centre SPD, it follows that when the references to taller buildings are removed, the SPD will need to be amended. Accordingly: **Remove all reference to taller buildings in a future development** on this site.

P282: **Site Wi 3: The All England Tennis lands**

P264: A clear distinction must be made in the Plan between the AELTC lands to the west of Church Road, and the newly acquired golf course lands that lie to the east. The latter are formally designated as Metropolitan Open Land (MOL), and are also part of the Listed Historic Park grade 2 star.

These designations have been in place for very many years, and the freehold of the land was purchased by the AELTC from the then Council in the 1990's, with that aspect fully understood, and confirmed in public statements, undertakings and covenants.

The London Plan (and its GLC Plan predecessor) and the various Local Borough plans since the creation of the Borough in 1965 have all made clear that this area is **open unbuilt parkland**, and is designated as MOL, the equivalent of Green Belt.

The NPPF (and its predecessor DoE Circulars etc) have been clear that Green Belt land is to remain unbuilt. This clear policy line has been maintained over time, nationally, regionally and locally.

This is land therefore (to the east of Church Road) that must remain open and unbuilt.

The current wording in the Plan however is ambiguous, and needs to be clarified.

Firstly, the Wi 3 designation should refer only to the 3 sites west of Church Road.

The lands to the east of Church Road, being the MOL etc, should **be given a separate designation, (say Wi 3A)** and described clearly as noted above.

All these eastern lands, and the rest of the Park, are also designated as a Conservation Area.

Secondly, the notes should be amended to refer only to the western sites, and all references to the eastern MOL lands should be removed, and placed in a separate entry.

Paragraph 4 should read "The main **western** site is approximately 14 hectares"

Paragraphs 5, 6, 7 should be **omitted and placed in the new entry for Wi 3A.**

Additional phrase to be added to paragraph 7: ".....respond to these sensitive designations.

In order to comply with these, no new structures of significance can be considered appropriate on the golf course lands".

Under the new Wi 3A entry, the 'Design and Accessibility guidance' should instead read:

"A master plan for the golf course land is to be prepared providing for some additional open tennis courts, within the clear parameters of fully maintaining the complete open-ness of the MOL, and with a respect for the Historic Park, with its veteran trees and natural zones".

On 'Infrastructure Requirement' an additional phrase is required to make clear that

"Church Road is to remain as a fully public highway", and is not to be subsumed into the AELTC lands.

Should restricted public access be required during the tennis fortnight, then this should be arranged on a yearly and temporary basis, using normal highway closure licensing procedures.

P286: Site Wi 5 Hartfield Road Car Park

Being in the Council's ownership, there is an imperative to use this site for social and community benefit, rather than (in the case of privately owned land) solely for profit.

There is currently a private proposal for a major music centre, which could add a significant amount to the Town Centre's "Arts offer" if the scheme can be made viable.

There would be advantages if the Council was able to positively engage with the promoters of the project, to see whether it can be taken forward.

Rather than being an "elitist" concept, a much more inclusive approach might allow for significant educational input to both local schools and the wider community.

Accordingly, the site allocation notes should be amended to read: "..... including **assembly, leisure, music centre, retail, offices, residential, hotel.**"

Retaining the freehold and leasing the site would allow the Council to maintain a degree of control over the functioning of public-facing facilities, as well as generating a long term and increasing income.

It is said that the income to the Council from the car parking use of the site has been upwards of half a million pounds annually.

The reference to including **taller buildings** (P288) is not agreed, and **should be removed.**

The scale of local buildings, noting the adjoining cottages in Ashbourne Terrace, as well as the clear message from public workshops, means that a taller building here would not be appropriate.

The detailed text for this site appears rather poorly put together, with extracts in part from what might be an estate agents' brochure. Such writing does not meet the standard set elsewhere in this Plan by the Council, and would benefit from review.

P289 **Site Wi 6** **165/71 Broadway**

The Site Description fails to mention that even at the present height, being on the southern side of the road, in the winter months no sun can reach the public footway on the opposite side of the Broadway.

Accordingly, the site description should be amended to include:

“Because as even the present height prevents sun from reaching the opposite footway in the winter months, no increase in height would be appropriate, and the recessed building line should be retained”.

The reference to **taller buildings** being included (P290) **should therefore be omitted.**

P292 **Site Wi 7** **Ravensbury Terrace**

The site location table (P294) should be amended to show that it does have an impact on a designated open space, being immediately beside it:

“Yes, being adjacent to the Durnsford Road Recreation Ground, and being within 400m of”

Add to Infrastructure requirements: (P293): “ Any development should be well set back from the boundary of the open space, to ensure that is not over-shadowed”.

Add to the Design and Accessibility Guidance (P293):

“Because the site is at the end of a long cul de sac, pedestrian movement and accessibility would be less than ideal. Any development for residential should be dependent on achieving an additional and alternative footpath link to the surrounding area”.

P295 **Site Wi 8** **South Wimbledon Underground Station**

Add to the Design and Accessibility Guidance (P296) :

“Any development should include a significant upgrading of the interior of the station entrance hall and its facilities. See also comments on Policy N7.1 above”.

This is a well-used station and important in its locality, and its upgrading would be highly desirable. As this site is in South Wimbledon, it should be deleted here and relocated to the relevant chapter and re-numbered.

P298 **Site Wi 9** **28 St George’s Road**

Being in the Council’s ownership, there is an imperative to use the site for social and community benefit, rather than (in the case of privately owned sites) for commercial gain alone.

Given that the site is in an area “deficient in nature”, consideration should be given to using the site (in the short term initially) as a small public garden. Funding could be via CIL payments.

Accordingly: **Add to the Design and Accessibility Guidance (P299):**

“The Council will encourage the interim use of the site as a Community Garden, designed and maintained in part by local groups. This will not only provide a local open green space for public use, it could also operate as a centre for local groups to facilitate the future town plan, and act as a local public information centre on Climate Change and the Retrofitting programme”.

The reference to **taller buildings** being included is not appropriate, and **should be deleted.**

P301 Site Wi 10 30 St George's Road

The reference to **taller buildings** being included is not appropriate, **and should be deleted.**

As it appears that the daylight to the rear 'garden' land (currently parking) could be severely compromised by a proposed development to the southwest, contrary to plan policy, Add:

"It would be an advantage if sites Wi9 and Wi10 could be designed together".

P303 Site Wi 11 Broadway, Hartfield Crescent, Hartfield Road and Piazza

The site description needs to include the following:

"The majority of the Broadway frontage is within the defined Broadway Conservation Area, as are the sites adjoining to both east and west. The opposite side of the Broadway is also within the Conservation area".

The fact that the site description has not made this clear is disgraceful, and is to be deplored.

The reference to the South Park Gardens conservation area is not correct and should be removed.

"The pedestrianised link between the Broadway and Hartfield Road follows the original line of Victoria Crescent, and is a public highway. This should remain.

The pedestrian route on the eastern site boundary, leading to the Council car park is also a public highway.

"This site was redeveloped in the 1980's, and as such, should be considered for renovation and adaptation rather than what is likely to be seen as wasteful redevelopment, and contrary to the emerging principles around sustainability and climate change.

Embedded carbon from demolition should be included in sustainability calculations.

"The creation of the Piazza has proved an important success, and is now seen as an asset both as a pedestrian space, and as an important space, with its own distinctive image in the town.

"It also allows winter sun to penetrate into the Broadway, which otherwise is in permanent shade.

The retention of this iconic Piazza space should now be regarded as an essential.

The height of the Broadway frontage reflects the scale of the other properties in the conservation area and should be maintained.

"The presence of a single large supermarket along one side of the Piazza and Victoria Crescent has had a dulling effect, with little interest, blanked frontages etc.

It would be substantially improved if the "small narrow frontages" policy approach (see Page 455) was applied here.

"Depending on the detailed design studies, if Hartfield Road is to become 2-way, a setting back of the ground floor facade, and/or the redesign of the footway may be needed. "

The reference to **taller buildings** being appropriate **should be removed**, being within the conservation area.

P306 Site Wi 12: Wimbledon Stadium site

It is not clear why this site is included, being largely constructed: nor why the accompanying map is now outdated.

P310 Site Wi 13 Worple Road/St George's Road: Sainsburys

P311 Of the two road frontages, Worple Road is by far the more interesting for pedestrians with its variety of uses, some small frontages, bus facilities etc.

Accordingly, (para 2) should instead say: " active street frontage **along Worple Road ...**".

The defined shop frontage map in **the Appendix** should **be amended** & show this site as shopping.

The reference **to taller buildings** being acceptable **should be removed**.

The critical drainage area designation needs to be reflected in the proposals: suggest add: **"The flooding from surface water should be countered by suitable on-site amelioration measures"**.

P313 Site Wi 15 The YMCA site, Broadway

It is noted that a planning permission for redevelopment has already been granted by the Council. Should this not be proceeded with, then the design guidance should be amended to include:

"Any redevelopment proposals should aim to reduce the height of the existing buildings, to lessen the visual impact on the residential properties to the north.

Given that the northern footway in the Broadway is in almost permanent shadow in winter months, a planted and south-facing set back space could benefit the street scene.

As the properties along Trinity Road are set back from the frontage, the scale of the street would benefit from a similar setting back on the YMCA side, with the height of the frontage matching its neighbours to the north and east."

The reference **to taller buildings** being acceptable **should be removed**, as this adversely affects the residential properties to the north.

P316 Site Wi 16 Centre Court Shopping Centre

This Shopping Centre was built in the 1980's, and to describe it as a brownfield site is not credible.

The first sentence should instead read: **" The demolition of such a recently built structure is considered wasteful of resources, and instead of redevelopment, adaptation should be promoted"**.

Additionally: **"Any development should take account of the zero carbon targets, and as set out in P42 above, calculations of projected carbon emissions should include not only those from the construction of the new project, but also those arising from any demolition"**.

This reference **and the whole first sentence** (the site provides an excellent opportunity.....) should **therefore be removed**.

The reference to the Listed buildings and Conservation area is totally inadequate and needs strengthening, as follows:

"A substantial portion of the site lies within the Wimbledon Broadway Conservation area, which also includes the frontages of the opposing properties in both Queens Rad and the Broadway.

The site contains two Listed Buildings: The Old Town Hall and the Old Fire Station, both vacated in the 1980's. The Town Hall facades are arguably the very best in the whole town.

The 1980's development regrettably removed the whole of the fine interior of the Town Hall, with its fine marble stair, panelling and committee rooms. What was left was a shell, which had at least a range of boutique shops at ground floor level.

These were subsequently removed and replaced by a supermarket. This fine 1930's building has been treated internally with minimal respect, and its potential needs to be rediscovered. Accordingly Add:

“Any development proposals should utilise the ground floor of the Old Town Hall in a way which respects and enhances the nature of the interior of this fine listed building.

The opportunity exists to utilise this ground floor for community use, providing local services and acting as centre for local information, for driving the retrofitting programme, for involving local people in the future planning and management of the town itself. (see also site Wi 9 above).”

The potential for new development over the station tracks suggests that connection of the upper pedestrian Mall across to such a development could be advantageous. Accordingly:

“The potential for connecting the upper pedestrian mall level to a future development above the rail tracks and station should be considered”.

The current building includes a ramp that was designed to form the approach to a new road bridge across the railway. Today's reliance on a single main road bridge in the town is inherently risky, and the existing structure is said to be less than ideal.

The introduction of a second bridge has been a Policy intention of the Council in past Plans. Accordingly, the importance of ensuring that this crossing of the tracks is safeguarded is paramount.

Although the timing of the Crossrail 2 project is not yet understood, a bridge in this location has been included in all the project's design concept drawings. Therefore Add:

“The provision of an approach to a future road bridge across the tracks should be fully maintained at the northern end of the site”.

The reference to **taller buildings** being suitable for this site, being within the conservation area and with sensitive Listed Buildings, is ill considered and insensitive. Such a reference **should be removed**.

10 Health and Wellbeing

P 319 10.1.21 Air Quality

Even if developers are persuaded to build in such a way that their project does not worsen air quality, as explained above, the great majority of the Borough is already built, and air quality standards remain poor. This is particularly where major pedestrian concentrations and shopping centres are affected by traffic fumes.

Waiting for electric vehicles to solve the problem should not be an option.

No matter how many students and parents are persuaded to adopt sustainable travel options, poor and unhealthy air quality will remain (10.1.21).

The Merton figure for particulate air pollution has climbed to 5.3 compared to the England average of 4.7, and transport locally accounts for 57% of NO₂ (with domestic gas being 18%).

Nitrogen Dioxide (NO₂) standards are not met in many of the Borough's major roads and junctions, nor in centres like Wimbledon Broadway, South Wimbledon, Morden, Colliers Wood, Wimbledon Village. (Merton Air Quality Plan 2017 – 22).

Suggest Add: **“Removing or limiting or removing traffic in such areas of high pedestrian concentration could deliver better air quality for people, as well as improve the quality of life in the centres themselves”.**

The re-routing of HGV's is indeed being proposed in the LBM Air Quality Action Plan, which can help. Which is why pedestrianisation and traffic re-routing is being suggested in N7.1, N9.1 above.

P332 11 **Housing Provision**

H11.1 Whilst the proportion of housing tenures in private development is being set, it is not often complied with in practice.

Where the Council itself is the site owner, and the imperative is that the site be developed in the public interest rather than for profit, then the social housing component should be achieved as a minimum, and space for Self-build should be included.

The latter is being currently promoted by HMG, and Councils are required to identify suitable sites.

Add new policy K: "Where the Council is itself the owner of a site, the social housing component will be adopted as a minimum, and space will be provided for Self-build housing".

Without the necessary resources it has not been possible for the Society to assess the environmental and other implications of the proposed housing increases in sufficient detail to offer comment.

P369 **H11.7 Build to Rent**

Proposed Policy A indicates that B2R must be for a minimum of 50 homes. The justification refers to the relevant London Plan policy, but it is not explained why this threshold is required.

Given the housing shortage, there does not appear to be any good reason why the building of rented housing on small sites needs to be prevented by Planning Policy. **This Policy should be omitted.**

P372 **Places and Spaces**

Policy D 12.1

A significant planning and design requirement is **respect** for, not just the scale and character of the local neighbourhood, but the amenities of neighbouring property and occupants.

This translates for example into protecting the privacy of the back gardens, preventing overlooking, ensuring good daylighting to not just windows, but also the rear gardens.

Such respect and protection is achievable via the planning system, so that aggressive (or perhaps thoughtless) development is constrained. *"The market has no morality"* (M Heseltine 2021)

Many developments engender needless objections from neighbours simply because the design fails to comply with sensible neighbour protection standards.

Current experience is that the development industry does not understand this, unless planning policy and guidance is clear.

So important is this element that an additional policy should be placed at "C":

"C : Ensure that the design meets the Council's standards of privacy, overlooking, daylighting and sunlighting to neighbouring property and land. (See also policy CC2.4 above)."

P 381 **Policy D 12.2 Trees**

The requirement by the London Mayor is that the Borough plants many hundreds of trees each year for 20 or more years. The Council has a programme of tree planting in the highway, and in Council-owned lands and open spaces, although not it seems up to the level set by the London Mayor.

Many trees are of course felled without any kind of Council intervention or knowledge, being not covered by Tree Preservation Orders, nor being in Conservation Areas.

Tree cover is much less dense in the east of the Borough.

In new developments, the 'one for one' replacement of mature lost trees by saplings is clearly not 'like for like'. The result is more public objection, more delays, and an overall reduction in nature, and a loss to the local environment and townscape.

The Plan therefore should now contain clear proposals to improve and increase the tree stock. Accordingly, an addition to 'Y' should be:

"The Council will undertake a tree planting programme in the streets and Council-owned open spaces of (a figure to be decided, but being well into the hundreds) each year.

"Additionally, the Council will publicise schemes that provide householders with 'free' trees to plant in their own gardens.

"In new development, the retention and protection of existing trees and root systems is a priority.

"If any trees are to be lost, then their replacement should be calculated on a "tree-years" basis.

"The combined ages of the lost trees should be matched by the combined ages of the replacements, calculated on the following basis:

- for specimen/veteran trees eg Oaks, Cypress etc, or TPO trees, then lost years x 3:
- for other trees in Conservation Areas, then lost years x 2:
- for all other trees then lost years plus 50%. (See also Policy 15.4 page 517)

"If the development site is not able to accommodate the new trees, then the surplus should be passed to the Council for planting on other sites."

P381 Policy D 12.2 Maximising greenery

Policy 'Y' refers to 'Urban Greening' which is welcomed.

However, much new development has a high site coverage, so restricting the amount of building and hard surfacing can maintain green-ness to some extent.

Accordingly, add policy at 'Z' :

"New development should maintain at least half of its site area as unbuilt, unpaved and green, to provide space for nature. In housing terraces, front gardens should aim to be at least one third green: in semi detached or detached houses the proportion should be at least half.

If access for cars is required, then a single entry from the street would allow more of the garden to be kept green, and reduce the number of crossovers. (A simple one page design guide would help). The use of green roofs and green walls should be encouraged". (See also P395 12.3.22)

P397 12.3.32 Single Aspect Dwellings

As written, this policy allows developers to construct single aspect dwellings, with minimal restriction: this should not be accepted.

Not only lack of natural and substantial cross ventilation, but for the occupant there is no opportunity to move away from what might be an intrusive or noisy situation.

Instead, 12.3.32 should be re-written:

"New single aspect dwellings are inherently unsatisfactory, with a lack of natural and substantial ventilation, and very limiting to the occupants in their daily lives. They are not considered suitable for urban living".

P399 **Policy D 12.4** **Alterations to Existing Buildings**

Many objections by neighbours to proposals are based on what are seen as adverse effects or intrusions. Ensuring that new extensions do not unreasonably diminish the natural daylight and sunlight and privacy to adjoining gardens is essential.

Add to "L": "does not significantly impact the **Daylighting, Sunlighting and Privacy** of neighbouring **Gardens** and buildings."

P402 **Policy D12.5** **Managing Heritage Assets**

"E" Should be amended to read (as we have Historic Landscapes in the Borough):
"The loss of a building or landscape that makes a positive contribution to a conservation area....."

Additionally: The **enhancement of heritage assets** has been implicit in past HMG Circulars and in the NPPF, and the powers exist for Councils to set up heritage grant schemes to aid householders and others to improve their property.

Past schemes elsewhere have generated up to twelve times the private funding that has come from the simple Council grant. CIL funding is potentially available, and such a scheme would give the Council a creative and positive role in driving forward enhancements.

This positive approach can be a welcome balance to the more normal regulatory and sometimes necessarily restrictive approach to "Heritage" by the planning system.

Accordingly, an additional policy paragraphs should be added at **"H"**:

"H: Subject to the resources becoming available, the Council will operate a Heritage Grant scheme funded via the CIL, to encourage householders to improve the exterior of their property."

P405 **12.5.6** **Types of Heritage Assets**

In the list of Heritage assets, some are classed as "designated" and some as "undesigned". There does not appear to be any reasoning for this irrelevant distinction. They are by definition all "designated".

OMIT references to designations.

P408 **Policy D 12.6** **Tall Buildings**

The Council's phrase that "It will generally support" should not be accepted. It gives the wrong emphasis. Only if the promoters meet stringent criteria should they be accepted.

The Society view is that such "written policy" criteria (which have been used across London for many years) have been ineffectual in ensuring that high buildings are located satisfactorily.

However, if the Council wishes to take this approach, then instead the text should read (line 15): **"There will be a general presumption against tall buildings. The Council will only support tall buildings where:...."**

On **"P"** tall buildings are not considered appropriate in Wimbledon Town Centre and this reference **should be removed.**

P411 **12.6.2** Recent studies have shown that taller buildings are **less energy efficient** than those around 4/5 storeys (see Smith & Gordon 2020: and UCL Shimitzu & Others 2020).

Digital Infrastructure

Telecommunications applications generate much opposition, both on alleged health and on amenity grounds. There is no co-ordinated plan, each application being submitted seemingly ad hoc. No-one knows whether mast sharing is happening, not how many there will be.

And the masts are accompanied by up to five differently “designed” metal cabinets at their base, which even politely can only be described as a shambolic mess, a blot on the landscape, as well as an obstruction to the footway.

The Council’s suggested “waiting for the next application” approach will do nothing to stem this flow. Instead, the Council could, with the various operators, produce a telecom plan for the Borough, with rationalised siting, mast sharing, a totally different approach resolving the cabinet mess, removal of obsolete equipment.

Suggest Add at “A”: **“ The Council will work with the various telecom operators to produce an overall telecom plan for the Borough, promoting mast sharing, cabinet rationalising, improved design standards, and removal of surplus telecom equipment”.**

Local Town Centres

(ii) the proposal to prevent the amalgamation of frontages in Wimbledon Village **is strongly supported**, as this will ensure both that there will be a wider variety of activities, and also that smaller businesses will be able to afford to continue.

The same approach should be considered in the two Town Centre Conservation Areas, where the current properties have (conveniently) narrow frontages. Accordingly it is suggested that (ii) be revised, also removing the reference to “existing”, as this could also apply to new development should this take place.

Amend to read: “Supporting proposals that do not amalgamate ground floor shopping frontages in Wimbledon Village and in the two conservation areas in the Town Centre, so as to result in”

Culture, Arts, Tourism

A (iii) Suggest add: **“Providing for new arts and culture facilities in the Council’s own development site in Wimbledon Broadway Car Park beside the Theatre (See comments on site Wi 2).”**

Gas and Electricity

Given the exceptional importance of maintaining and protecting the electricity supply system, it would be desirable to Add:

“and disruption. The vulnerability to flooding of the existing installations at Plough Lane and the Burlington Road junction justify concern, and the need for exceptional resilience”.

Open Space and Nature

With the increased likelihood of storms and flash flooding, the ability of existing watercourses to hold increased flows is limited. Accordingly, in order to lessen the flooding events, providing run-off holding areas, opening out some currently culverted streams and other measures may be beneficial.

Add therefore after F: “whilst protecting its biodiversity value. To help alleviate some of the potential flooding issues, run-off holding areas (eg see site RP3) will be sought beside streams, and some streams that are currently culverted may be opened out”.

Some areas may benefit from creative informal planting by local groups, sometimes styled ‘Guerilla Gardening’. This is already in place with the Council’s Climate Change “greening” Group:

Suggest Add after ‘H’:

“J”: **The Council will give support to local groups to undertake planting and upgrading of areas that improve the local landscape”.**

P506 Policy O 15.2

Open Space and green infrastructure

(A): The use of the phrase “inappropriate development” allows developers to claim that their development is appropriate, and should not be accepted.

Instead: at “A” it should read: “ **Protect (etc etc) designated open spaces from all development in accordance....”**

(B i): The suggestion that a (biased?) assessment can show open land to be surplus is clearly able to be manipulated by developers. The primacy in the Plan of maintaining all designated open land as unbuilt should be paramount.

Accordingly, **paragraph B I should be removed altogether.**

(C): The suggestion that open space can be lost subject these ‘design’ criteria is again an open door for developers to argue that their scheme is “well designed”, and that the open space can be built on.

Any ‘design’ issues can be resolved by reference to the relevant design policies elsewhere in the Plan.

Accordingly, **Paragraph C should be removed entirely.**

P507 15.2.5

MOL and development

Again the use of “inappropriate” leaves the door open to developers to argue that their new building on the MOL is appropriate.

Accordingly, the phrase should be amended to read: “ **MOL will continue to be protected from all development, in accordance with.....”.**

P511 Policy O 15.3

Biodiversity and Nature

Again, as noted above, item “A” should be amended to say: “ **Protect all sites of recognised nature conservation interest from all development that will adversely affect**”.

Green corridors are only partially mapped in the Plan (see note on Appendix), and it would help to develop their definition further. Also, the Council should aim to resolve or connect up the missing links, through local site initiatives and planning briefs.

Accordingly, item (C) should be amended to read: “**C: (The Council will) Identify the principal Green Corridors throughout the Borough, and will promote the filling in of any significant gaps via local agreements or planning briefs.**”

P517 **Policy O 15.4** **Tree Protection**

This subject has already been covered in page 381, Policy D 12.2, which could be repeated here. Essentially, the approach should be:

**(a) the Council should continue to plant trees in the public highway and on Council-owned land: and
(b) A “Tree Years” replacement approach should be used for any trees lost to development.**

The use of “equivalent financial value” (E) or the CAVAT financial calculation (15.4.11) is more suited to the Magistrates Court when assessing damages etc, and is very cumbersome in use.

The Tree Years system is far simpler, easier to understand, and easier to adjust to the scale of the loss (where Oaks are valued more than Sycamores etc).

The texts should be modified accordingly to remove references to CAVAT etc.

P529 **Policy F 15.7** **Flood Risk and Sustainable Drainage**

With what seems to be agreed as the greater expectation of flooding in coming years, merely “steering” development away from flood prone zones is not considered sufficient.

Instead the Plan should be clear that vulnerable development in high flood risk areas is not compatible with prudent planning.

Instead the Plan should clearly identify the areas of high risk, and then set out Policy that effectively embargoes new build of vulnerable uses. The Policy should be rewritten accordingly.

Additionally, **there should be a programme of measures for protecting vulnerable uses and buildings that already exist in high flood risk areas.**

(See also the comments on P233 site RP 3).

P544 **Policy P 15.10** **Air Quality**

This subject has been covered previously (see P319 10.1.21) and it would be desirable to **combine them and lessen repetition.**

P558 **Policy T 16.1** **Sustainable Travel**

The single most important element, or component, or ‘user’ of transport has to be **the Pedestrian**. Currently the pedestrian is in most cases only allowed to have the space that is not required for vehicles, and this cannot now be right.

Proposals for Pedestrian zones in town centres, where there should be major ‘people-focussed’ spaces for civilised interaction and enjoyment, are conspicuous by their absence in this Plan.

Through traffic brings nothing to a centre except noise, fumes, danger.

Hundreds of towns in Europe (including the UK of course) have pedestrianised and re-energised and humanised parts of their centres with success since the 1970’s: reports of failures are conspicuous by their absence.

A rebalancing of the space allocated to the wheel and the foot is overdue if towns are to thrive.

Secondly, the public transport system should be prioritised, so that it becomes a reliable, convenient and interactive public service, available for all.

Linkages between rail and bus for example need to be seamless, weather proofed with linked timetables, but are currently often inconvenient and haphazard.

The **suggested four points** are ‘worthy’ but seem to lack a sense of real direction and strategy. Their sentiments would be best subsumed into the general body of the text, and **replaced with:**

- **Prioritise the Pedestrian over vehicles, with an emphasis in town centres: then**
- **Create a coherent public transport network, properly linking the rail and bus and cycle systems:**
- **Progressively remove damaging through traffic from local streets:**
- **Encourage take-up of zero emission vehicles:**
- **Restrict accessibility to polluting vehicles.**

The action points (a-f) should include further development of the Council’s good recent work on School Streets, also on Low Traffic Neighbourhoods, and implementing in stages the proposed upgraded cycle network.

Other points have already been covered earlier in the document, and need to be shown on this “to-do” list: eg the CR2 project (see 17.5.8), future rail bridges (see P316 site Wi 16).

Town and other centres need to be freed from traffic dominance, polluting vehicles need to be progressively excluded from sensitive areas, where pedestrians congregate or where there are vulnerable users eg schools.

So **Add:**

- G Develop and extend the School Streets and Low Traffic Neighbourhood projects, working closely with local interests in the creation and evolving of schemes beforehand:**
- H Implementing the cycle lanes and priorities set out in the cycle network plan, and concentrating on significant major links, where cyclists are currently unprotected:**
- J Identify the lands with TfL that need to be safeguarded should the CR2 project proceed (see T16.5AB)**
- K Progressively divert through traffic away from Wimbledon town centre to create a largely pedestrianised heart for the town:**
- L Safeguard land beside the existing Broadway/WHR rail bridge, to allow the future construction of a parallel replacement bridge:**
- M Safeguard land for the future construction of a new road bridge between Queen’s Road and Alexandra Road (see site Wi 16: and Policy T16.5B)**
- N Introduce low/zero emission zoning, prioritising vulnerable users eg schools.**

P560 16.1.1 **Transport Challenges**

The reference to ‘congestion’ would benefit from **an additional sentence** that in effect said that (as has been known since the Buchanan Report of 1963) **that traffic expands (and contracts) to fill the road space available.**

P562 16.1.9 **Delivery vehicles**

The Plan is right to highlight the recent growth in delivery vehicles. If (as is hoped) the creation of more pedestrianised areas in town centres proceeds, then deliveries to local premises will need to be provided for in different ways. Which can be done, but may need special and tailored solutions.

So Suggest Add:

“Introducing new Pedestrianised areas will generate a need to tailor new ways of providing for deliveries to local businesses”.

P578 **Policy T 16.5** **Transport Infrastructure**

The five policy points tend towards relying on others (developers) to “do the right thing” by ensuring that their proposals can be made acceptable.

What seems lacking is a sense of “**what positively needs to be improved**”.

Actively preparing for the introduction of CR2, with the need to protect land so that it can be built; (this is largely covered by point B):

Making proposals (not waiting for them) that will begin to join up the rail and bus and cycle networks to meet the sort of far higher performance standard, that people have seen elsewhere.

Point C relies on others to meet the present (low?) standards, but there needs to be action by the Council with TfL etc to improve the system when no developer is involved locally.

One should now be seeing the working out of the implications for the progressive introduction of pedestrianisation in town centres. So suggest Add:

“F Produce proposals with TfL for a programme of much improved linking of rail, bus and cycle networks at stations:

G Implement a phased programme of pedestrianisation, and the re-routing of through traffic away from both Wimbledon Town Centre, and of South Wimbledon.”

P580 **Table 16.1 List of Transport Schemes**

This Table should have additional items: suggested are:

“TN15 Land safeguarding for Queen’s Road to Alexandra Road bridge (see Site Wi 16)

TN16 Land safeguarding for replacement bridge Broadway/Wimbledon Hill Road

TN17 Land safeguarding for level crossing works (see Site RP3)

TN18 Land safeguarding for possible relocation of Raynes Park Station

TN19 Semi pedestrianisation works in the western arm of the Wimbledon Village High Street

TN20 Through traffic deviation works at Hartfield Road as the first stage of traffic reduction and pedestrian improvements in Wimbledon Broadway”

P585 **List of Metropolitan Open Lands**

The Council could request the GLA to consider designating Morden Hall Park (M001) as an MOL. Does the Map of MOL and Open Spaces in the Appendix already show it as included?

P600 **Local Sites for Nature Conservation**

The Council could consider adding Rookwood Open Space/Beverley Brook (M007) to the list.

P613 **Listed Buildings**

Eagle House is graded 2 star, and the Railings etc are grade 2. **This needs to be added.**

P619 31B St Mary’s Road: the Peter Foggo house is grade 2. **This needs to be added.**

It would be desirable to recognise that a town centre is not simply a prosaic "place to shop".

Suggest Add at the start of the definition.

"A Town Centre acts as the heart of a community, a place that gives local identity and focus to the local people.

"It often has a great variety of uses and activities, not just shops, but workplaces, community and social and public services, and may have a transport hub.

"The boundaries of the various centres are shown on Merton's Policies Map." (etc)

POLICIES MAPS

Green Infrastructure Policies Map 3: Green Corridors

This map defines certain open spaces and links, but an understanding of green corridor linkages might be developed further. For example the many thousands of back gardens in the Borough form a whole series of linkages for nature to 'travel' along.

Would a map that illustrates this, show where there were very abrupt breaks that needed attention?

Heritage Map 3: Listed buildings and Conservation Areas

It would be helpful to have a **list of the Conservation Areas in the margin**, with their reference number placed on the map, perhaps in different colours.

Multiple Deprivation Map

This vitally important map should have a clear explanation of the **meaning of the various values/colours** in the key panel. And a cross reference to the Plan text.

20 Minute Neighbourhood Map

This has been presumably constructed using an "800m from the edge of the defined centre".

It would be interesting to see the alternative "isochron" map that defined the edges by the **true walking distance**, ie measured along roads/paths rather than 'as the crow flies'.

It is likely that the boundaries will contract somewhat, and may possibly indicate some shortfall.

Cycle Network Map

A companion map would be useful, showing **the current 'status' of each link**.

For example, there would be some cyclepaths classed as safe and entirely segregated from vehicles today: others where the cyclepaths were of good standard but were beside vehicles, others where the standards were lower and so on.

And there would be some that would be classed as totally unsatisfactory.

From this kind of information one could see what progress needed to be made, and which routes were candidates for improvement.

Proposed Public Transport Map

This should also include **safeguarding land for projects listed above in 16.1**.

SOME TYPOS FOR POSSIBLE CORRECTON

- (A) P 37 Chapter 2: Climate Change, in Strategic Policy CC2.1 - Typo in Para 2.1.11 – for “29,0002” read “29,000”?
- (B) Pp 220-224 Chapter 6: Raynes Park, Policy N6.1 (h), (j) & (l) & Paragraphs 6.1.1 and 6.1.12 all include references to Wimbledon Chase, which is within the defined Wimbledon area, not Raynes Park.
- (C) Pp 249-260 Chapter 7: South Wimbledon, the Site Allocation for South Wimbledon Station should be listed under this Chapter (say as SW1), not under Chapter 9, Wimbledon, as site Wi8.
- (D) Pp 276 & 282 Chapter 9: Wimbledon, Site Allocation Wi 3 (AELTC) – there is a mismatch of the area covered between the overall site allocation map on page 276, which excludes the Wimbledon Park Golf Club land, and the detailed map under Site Allocation Wi3 on P 282 which includes both the Golf Club land and the Wimbledon Club’s land.

P 283 Similarly, the detail of Site Owner only shows AELTC whereas, if the Wimbledon Club’s land is to be included in Site Allocation Wi 3, it should also list them as well.
- (E) Pp 295-297 Chapter 9: Wimbledon, Site Allocation Wi8 (South Wimbledon Station) – should now be listed & numbered under “South Wimbledon”.
- (F) P 526 Chapter 15: Green & Blue Infrastructure, Para 15.6.12 replicates most of Para 15.6.10 & should be deleted & subsequent paras renumbered
- (G) P 618 Appendices – Drinking Fountain & Castle/Horse Trough, Parkside SW19 - **Cattle** not Castle.