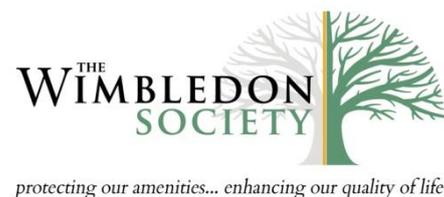


Planning Division
London Borough of Merton
Civic Centre,
MORDEN
SM4 5DX



18 January 2022

For the attention of David Gardener

Dear Sir,

21/P4135 - BANK BUILDINGS, 41-47 WIMBLEDON HILL ROAD, SW19 7NA

This proposal is for the adaptation and conversion of four of the six units in the existing building to an 'apart-hotel', together with ground floor retail and additional uses. The site is within the Wimbledon Hill Road Conservation Area, and this 1885 building itself is **Locally Listed**, and regarded as one of the **"most magnificent buildings in the town centre"**. (LBM character assessment 7/2006).

The comments that follow cover firstly the **works to the building**, followed by **the hotel issues**.

THE BUILDING

As the Council will know, the Society was wholly opposed to the earlier schemes based on large scale demolition, excavation, redevelopment, and only retaining façades, an approach which in our view was not in accord with national, regional and local planning policies for heritage assets.

However, this new design approach, as set out in the DAS document, is radically different. It says that its aims are **"restoration and conversion"** & **"enhanc(ing) the quality of the building"**. (DAS 1.2&3)
The only significant demolition proposed concerns the shopfronts (see Application form item 6).

Unfortunately, this is **undermined by a number of contradictory phrases** in the documents that are presumed to have been utilised for the earlier redevelopment schemes, and not updated. These include "redevelopment of the site" (12.2), "retaining the building's existing facades" (DAS 3.4 & 1.3), "redevelopment of the interior" (DAS 1.2).

As the plans clearly show that the whole of the existing building outline and fabric is to be retained, with only minor changes, **it is essential that the applicant fully clarifies this aspect** before the application is determined. The Society's views that follow are on the clear assumption that the project is now to be based on the applicant's proposed **"retain and restore and convert"** approach, and categorically not on the notion of "redevelopment", which would be strongly opposed.

Such a 'retain and restore' approach follows the Planning Policy line on heritage assets in the NPPF and also in the London Plan policy which says that **"development should conserve, restore, re-use and incorporate heritage assets"** (7.8b).

The drawings clearly show the retention of the whole structure, its adaptation and renovation, and in principle therefore is welcomed, being very much in tune with planning policy on Heritage Assets.

There are some aspects that one could encourage the designer to develop further.

1. In this Conservation Area, the narrow frontages result in a large number of smaller shop units, and this is a valuable part of the local character. It would therefore be highly desirable for the **proposed unit two to be split into two smaller shop units**. This would also eliminate the need for the proposed radical removal of the main structural "party" wall at ground floor level.

2. The use of integral shop blinds and regular signage is welcome, as is the restoration of the pilaster finials, and of some of the (currently missing) internal elements. (DAS 5.3). In buildings of this period the glazing panes work best when they are narrow or have vertical proportions, rather more than the large single pane, as drawn. (See the Council's SPG on Shopfronts)
3. The existing ground floor projection on the Alwyne Road elevation has always seemed to be a rather crude later addition. Whilst its proposed re-cladding is an improvement visually, it still merely masks this ungainly shape, so poorly related to the proportions and form of the main building.

Should not this ungainly later projection be **cut back to align with the upper floors?** The resultant ground level space could then support some planting.

Could the fine oriel window at first floor level be mirrored by locating an entrance below perhaps?
Could the interesting existing ground floor doorway be relocated accordingly?

4. The bar, currently shown as fronting Alwyne Road, introduces town centre activities into this residential side road, and this is considered undesirable. Instead, any floorspace use in this position should be low key, and more compatible with residential activities. (See also point 10)
5. The **BREEAM score** should not be aspiring to (so-called) 'very good', but should be clearly proposed and guaranteed to be "**Excellent**". (DAS 7.1)
6. Incorporating **solar panels/slates** is referred to: these should be shown on the roof plans. (DAS 7.1): application drawings should always show specific proposals.
7. The Society does not have sufficient information to comment on matters of **Fire Safety**.
8. There are some **significant discrepancies** between the application form, the drawings and the supporting texts, which should be finalised before any Council decision is taken please. These include:
 - i) proposed employees figure is shown as 35 (application form item 32) and 90/120 in the texts (OMF p2): also, there seem to be minimal spaces for hotel staffing, operations, facilities, stores:
 - ii) 93 bedrooms are listed in the OMF (p1), but 21 are shown on the drawings: and they are not over 5 floors, but only 3, and there are no bedrooms in the basement: (OMF p1)
 - iii) there is no hotel control room (see below) on the 4th floor, as this floor does not exist (OMF p1).

THE HOTEL

By contrast to the "heritage" issues above, **the hotel entry causes concern.**

9. The present approach places the (minimally designed, almost a 'hole in the wall') hotel entrance in the residential side road, and this raises some significant adverse issues. It introduces town centre activity into a residential road, which is not desirable.

Additionally, the proposed entrance arrangement appears to be controlled electronically and **remotely by a distant off-site control room**. Without **on-site personal supervision and control**, the use of and access to the Hotel and its upper floor accommodation could become highly problematical for local residents.

10. The entrance to the Hotel, now shown as being from the side road, also raises issues for Women and **Vulnerable users**. **Hotel entry should instead be directly from Wimbledon Hill Road**. In order to exercise proper control over how the hotel operates, there needs to be a **permanent concierge-type presence**, perhaps linked to a coffee shop etc.

The space currently shown as unit one would seem to have the potential to link up to the lift Core, and act as both **the entrance, the public face of the hotel use**, and the **'coffee shop'**.

CONCLUSION

- A. The **contradictory descriptions** of proposals need to be corrected before any decision is taken.
- B. Sensitive proposals for the adaptation and enhancement of this fine building, if carefully carried through in detail, could deliver a significant asset to both the Conservation Area and to the town centre. The project may even have the potential to be a future candidate for an award.
- C. But the current “**remote unmanned control**” approach to how the Hotel element operates should not be accepted: it needs to be rethought and redesigned before the Council considers approval.

Yours faithfully,

Chris Goodair
Chair, Wimbledon Society Planning and Environment Committee