

22 March 2021

## MERTON CHARACTER STUDY: CONSULTATION RESPONSE

The Society welcomes the production of a study that ensures that **“future development is informed by a detailed understanding of local character”** and that **“growth can be tailored to individual neighbourhoods”** (p6).

The commitment that **“areas having a strong existing character will be reinforced and protected”** and **“keeping the thread of history alive”** (p7) is noted.

The existing Character Appraisals, although not fully completed in some areas, have proved a valuable source of both information and inspiration, and it is important that they stay “in print” as an SPD, and not be superseded by this new document. A formal Council assurance on this would be welcomed.

The maps and historical information are helpful (ultra-small lettering should really be improved). It would be helpful to include maps of energy use, PV arrays, building heat loss, climate change (it appears that much of the work was done before the declaration of the Climate Emergency). External wall insulation, and PV arrays for example may pose interesting if sometimes difficult aesthetic choices.

Turning to detailed comments, although the limited time frame has not allowed us to be exhaustive:

P6: A1: “decisions made by THE COUNCIL” (not “Council officers”).

P24: The absence of Community organisations in the east of the Borough is worrying: we also need a Borough-wide map of local groups showing the areas they cover (eg the Society, RA’s etc)

P38: Wimbledon Town Centre (WTC) should be moved leftwards in the diagram, towards ‘re-examine’, as the amount of radical change and character loss being proposed by the Council SPD is not accepted.

P56: As the Merton High Street area is shown as a ‘major corridor intensification’, the re-routing of through traffic from this shopping street to Merantun Way should be considered.

P60: The description of Wimbledon Town Centre as ‘Metropolitan’ is not accepted and not justified.

P60: Quoting “the Town Centre should be pedestrianised” is welcomed, and now needs acting upon. The Council’s own scheme (2013) aimed at achieving this, needs to be dusted off and implemented.

P62: Reference to the existing large bulky buildings and the one-way system having a negative impact is exactly right: the Council’s SPD plans for even more bulky buildings should be scrapped. The need for “exceptional design quality” should be interpreted as being basic human scale, local character, building lines, respect for neighbours’ amenity, not the trivial dressing-up of elevations.

P63: The reference to The Nelson hospital rebuilds could be expanded to point out their sensitivity.

P64: Parkside: there is a fundamental need to protect views out of the Common by severely limiting the height of surrounding buildings. As an example, the aesthetic loss to Hyde Park’s sense of open-ness by allowing its edges to be defined by high building in the 1960’s should be a salutary lesson.

P64: The Capability Brown Listed 1765 landscape of Wimbledon Park needs to be included here. It would be interesting (given the projected works in the Park by both the Council and the All England Club) to have the sequence of historical maps that chart some of the changes eg the pre-Brown map by Roque of 1746, followed by Richardson 1768, Haynes 1770, Couris 1787, and the 1889 map.

P66: Include the need for peripheral building height control (see above) and the plotting of nature corridors leading to and from The Common.

P66: The pedestrianizing of the western arm of the Village High Street needs to be added.

P70: The listing of the principles that will “help to guide design that is in keeping with Wimbledon’s existing character” is welcome, noting that the current WTC SPD does not do this in our view. The absence of green space in WTC should be compensated for by planting in pedestrianised roads, in the footways, and setting back new facades from building lines (contrary to recent schemes). There is a failure to mention the opportunities for pedestrianisation and the creation of new greenspace in both WTC and the Village.

P76: The opportunity exists to rationalise the disruptive road system in Raynes Park, and to create a new station and pedzone. There should be acoustic fences to control the noise from the elevated A3, new pedestrian/cycle and green-ways created through the Shannon corner sites, schools site expansion.

P78: The projected use of watercourses as landscape assets is welcomed and needs to be matched by an embargo on vulnerable development on flood-prone land.

P111: The illustration of ‘mews houses’ is simplistic: such development will infringe the daylight to the private rear gardens of the nearby houses unless the mews are either of single storey or have their own private gardens: there is no point in building something in the pursuit of numbers if in the process one adversely affects the rights of others. It is not just the “windows” of the neighbours’ property (as mistakenly believed by developers), it is also their lands and gardens. P113 is better.

P131: Map information on storey heights not understood.

P132: A: not accepted: make clear that taller buildings are only accepted if Local Plan identifies such sites. Developers’ self-interest “justifications” are not planning-based. WTC should not be included.

B: “Urban Design Rationale” just encourages developer babble and needs to be re-phrased. The basic line needs to be that the planning system has to plan and design the town, no-one else can do it. The scheme architect than designs the building (within those urban design parameters). If the architect and developer try to design the town, or the planning system tries to design the building, we have chaos.

C: This section should be omitted and is not agreed: it allows developers to plan the town. The notion that so-called “exceptional design quality” is enough to make a scheme acceptable, is both naïve and unworkable.

P134: The two great open spaces in the Borough, Wimbledon Common and Mitcham Common would both be significantly damaged by allowing any views outwards to taller buildings on their periphery (see p64 above). Accordingly, both spaces should be ‘enclosed’ by strict height limit zones eg the whole length of Parkside, and the Drax Avenue area.

Unless the Local Plan specifically identifies areas for taller buildings, then much of the text simply allows developers to supposedly construct their own justification. In effect the planning of the town is passed to them and is not acceptable.

P136: The diagram showing the notion that “proximity to a public park” is a justification for a taller building is considered to be fundamentally wrong in the case of the two Commons, as noted above, and should be amended accordingly.

P142: The elaborate “re-imagining” of a future development of the Dundonald rail depot land seems strange: a simpler way of achieving this would be presumably to continue each of the existing short existing terraces. Putting high buildings beside the noise of the rail tracks, and dwarfing and overlooking the adjoining terraces, is not seen as sensible.

P143: There seems to be no justification for treating the western end of the Ridgway for “intensification”.

P144: Further Design Guidance could include:

Daylighting standards (routinely and wrongly measured by developers’ agents, that only deal with “light to neighbours’ windows”, forgetting that the actual land and gardens of the neighbours should also have their daylight/sunlight standards protected). Additional sunlight protection standards to the roofs of adjoining buildings, where PV arrays are likely, and where shadowing is damaging.

Additionally, a design guide on how to adapt the various types of housing stock to deal with energy, insulation, and the implications of climate change. With 37,000 terraced homes in the Borough, 34,000 flats, 10,000 semi-detached and 3,500 detached, there are a range of options – some of which have real implications for local character and appearance.

P144: A plan with text illustrating the “20-minute neighbourhoods” should be included. This planning concept long pre-dates the current fashionable promotion, and its welcome return needs to shape the future of local services and local accessibility.

Finally, this is the kind of planning document that could be a useful resource for local groups as well as those engaged in the shaping of development. Accordingly, it would be highly desirable to have a printed version available, rather than being held in website-only access.

The Society looks forward to the publication of the eventual document.

Yours faithfully,

Chris Goodair,  
Chair, Wimbledon Society Planning and Environment Committee