

Rt Hon Michael Gove MP

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Dear Secretary of State

Ref: LB Merton 21/P3163

CALL-IN of a Planning Application: St George's House East, Wimbledon, London SW19 4DR

This planning application involves the demolition of a large 1980's office building of some 9,400 sqm, & its replacement with another much larger block of offices of 26,000sqm. The present building is ground floor plus 7 storeys, the proposal is far higher at 12 storeys. The Council has resolved to approve, & the London Mayor, to whom the application was referred, has passed the case back to the Council for decision.

The Society considers that this an application that raises questions that go beyond the remit of a local Council, and **should be 'called in' by the Secretary of State** so that further consideration can be given, before a decision is taken. The reasons are as follows.

Firstly, the Society considers that the proposal does not accord with either the heights quoted in the current Local Plan, nor with those in the draft Local Plan (now awaiting the Inspectors' report). It is also far higher than shown in the Council's SPG for Wimbledon Town Centre. This runs counter to the NPPF which says that applications that conflict with development plans "should not usually be granted". (2: para 12).

Also, the NPPF says that "applications should be determined in accord with the development plan, unless material considerations indicate otherwise". (4: para 47). No such material considerations have been quoted. Also, the NPPF says that development should "promote social interaction for example through mixed use developments". (8: para 92a).

The Independent Report on Offices in Wimbledon Town centre (Knight Frank/Market Outlook 2018) said (of the Council's office proposals) "the profile & scale of demand in the market place does not support the scale of development envisaged". Also "the local authority should be setting their sights lower (literally)".

This of course was written before Covid, & the substantial changes that have subsequently resulted in workplace relocation, working from home, office floorspace vacancies etc. The need for major office development here therefore is **clearly not plan-led**.

There is anecdotal information that in some Councils, unacceptably large town centre developments are being deliberately encouraged so as to generate larger CIL payments. It seems unlikely that such an approach would have been seen as desirable by those who put together the CIL concept in the NPPF.

Local people have consistently said that they do not want to see buildings of more than 6/7 storeys in the town centre. Instead of massive and expensive high-rent offices for outsiders, generating more travel trips, we need a development approach which both reflects local views, & primarily provides mixed uses, & much-needed housing. Offices generate more trade for lunchtime sandwich shops for 5 days a week: housing by contrast contributes life and activity (and social ownership of place) over the whole 7 days.

Secondly, the Society considers that the principle of demolishing a recently built, robust and substantial building (presumably in order to generate more profits) is totally contrary to the **basic concepts of building sustainably**.

Authoritative policy statements from the RIBA and RICS among others tell us that adaptation and renovation of existing robust buildings should now be the norm, rather than wasteful demolition and new build.

The embedded carbon footprint in such a major standing building is considerable, and demolishing it adds very significantly to the CO2 produced by a new development. There are also the traffic implications, the spoil relocation, the requirement for new minerals and resources, all of which are generated by **unnecessary demolition**.

Encouraging the overheating of the property market in the south-east, so that the investment needs of largely overseas financial interests can be smoothed, is hardly a blueprint for helping the disadvantaged areas in the 'levelling up' agenda.

The NPPF is clear: to be 'sustainable', development has to "minimise waste and pollution". (2: para 8: also goal 12). Recent studies have shown that commercial buildings of up to 4/5 storeys are very much more energy efficient than buildings that are much higher, as here.

CONCLUSION: This proposed development is seen as **not conforming to the local plan**, nor to its draft replacement, contrary to national policies (the first of the 'Caborn Principles').

Additionally, it clearly goes **against the national policy drive to build sustainably**, in that a sound modern building is to be demolished.

It continues to fuel the wasteful concentration of **over-investment in the south-east**, instead of moving creative financial energy to the areas of the UK which need significant help.

The projected high increase in office space has implications for generating additional travel from wider areas, creating (with other projected large scale office development locally) '**significant effects beyond the immediate locality**' (the second of the Caborn principles).

The proposal also fails to realise the pressing **need to meet housing needs**, (the fifth of the Caborn principles).

The Society would encourage the Secretary of State to **call in this application** and give it the wider consideration that it needs.

Yours faithfully

Chris Goodair,
Chair, Wimbledon Society Planning & Environment Committee