

The comments which are set out below follow on from the Society’s comments on the Council’s draft document produced in early 2012.

Rather than go through the whole of the current revised document in the same detail, this response aims to concentrate on some of the major issues only.

## **GENERAL COMMENTS**

With the experience of using the 2012 draft over the past year, when appraising planning proposals etc, the main issues that we have found include the following.

### **Structure:**

The current document reads as somewhat of an amalgam, giving the impression of being written by many hands, (eg the transport related material, or design), and then assembled. As a result it does not yet have a clear unifying approach.

It is also rather unclear to the average person what “The Plan” is: they cannot just pick up one document and read it.

They have to start with the NPPF, then go to the (GLA) London plan, then go to the Council’s Core Strategy, and then to the present document listing the Draft Policies, and eventually on to the more detailed guidance.

There are “Policies” in each of the first four, so both the professional and the layman need to know how they all knit together.

We understand that the Council has to follow the 2004 Act and PPS12 diktat, that material in “superior” documents should not be repeated, but would it not be possible to try to re- arrange the structure of the current document?

For example, each section could start with a cross reference to the relevant CS policy numbers: and might there be an attempt at coordinating the numbering systems?

The reader is also constantly being referred to other documents.

The complexity of all this could be a real hindrance to easy public understanding.

After the NPPF and the London Plan have “set the scene”, and the Core Strategy has broadly laid out the Council’s way forward, the current document has now to put all this together and become the practical tool of the plan.

It is to become the turn-to document that spells out both the general policy aims, and the practical ways in which the Council is going to go about achieving those aims.

This does not really come across clearly enough.

What is wanted is some way of making the array of plans coherent. It may be helpful to discuss this further after all the comments on the draft policies have been assimilated.

And it is essential that there is a Contents page, which should include policy numbers as well as subjects.

And why have Policies and Sites bound together in a single document, not least because the Policies are supposed to last for 15 years, but the sites are likely to be developed within that period. So separate volumes would be indicated.

### **Lack of certainty:**

Some policies are accompanied by caveats which significantly weaken the basic intention of the policy, and encourage applicants to “get around” them.

This not only creates doubt and more in the mind of the public, but sends an ambivalent message to developers.

**Neighbour Protection:**

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Time and again, when applications are being appraised, it is clear that the applicants have no clear idea that daylight and privacy to adjoining land and buildings has to be safeguarded.

They neither have the understanding of the Council's policies (which therefore need to be clarified), nor what these can actually mean in development constraints. Important to emphasise that rear garden land is to be protected, and not just the windows of a building.

**Urban Design:**

There is still confusion between urban design and the vague term "design", which is unhelpful. Urban design concentrates on the scale, height, massing, relationship to other properties, building line and so on: it is not at all to do with "architectural style". It needs to be said that the (urban) design of the town is the responsibility of the Council (no-one else can do it), and it cannot be left to developers.

They do not have the remit to design the town: they should design the individual development within the urban design constraints set by the Council. Not the other way round. Without this clarity, local people will have no understanding of how their town character is to be taken forward, and every new development becomes a lottery.

**Open Space Protection:**

There is still a loss of open space, and the proposed policies continue to be accompanied by "get-out" clauses, rather than being firm enough.

**Tree replacement:**

If trees will be lost in some new developments, this should be balanced by a clear replacement regime that ensures that either the Tree Years approach or the Girth equivalence approach is enshrined in policy. The response of the Council to the Society's suggestions on this (DM 02) should not be accepted.

**Site Coverage:**

There is a strong case for limiting site coverage (including basements) so that there is an amount of green and natural garden land available for rain absorption, the growing of plants and trees etc. Not only will nature benefit, but having space around houses, particularly family dwellings, is known to be important for general well-being.

This overall green-ness is also part of the inherent character and nature of the Borough.

**Development in Flood Zones:**

Vulnerable development is still being accepted in known flood risk areas, where we feel it should be embargoed.

Existing property in these flood prone zones is being left unprotected.

**Basements:**

There is a lack of clarity on the planning powers to control these; there are effects on underground water and on nearby property and trees; loss of nature and absorption of rain run-off; structural consequences for older buildings; a split of responsibility with Building Control.

All suggest that the new plan should have a policy and bring some order to what seems to be a fast growing development sector, which is causing public disquiet.

**Energy:**

The admirable initiative of the Merton Rule is not being followed up sufficiently, with major new high cost housing for example being “designed” to only the current minimum Code levels.

**Town Centre uses:**

With an evolving way of thinking about the role of our centres, a more coherent and imaginative approach is going to be needed. The planning approach of the past cannot be expected to succeed.

We may have to accept new ways of controlling land uses, retail frontages, and other uses that widen the offer. Not only the major towns, but the smaller centres too will need to be very differently managed and planned. Attitudes to traffic, parking, and land use all need to be totally re-examined if our centres are to be restored.

This will pose new challenges for the Council’s plan, but this does not yet come through strongly enough in the present draft.

Working collaboratively with the new WTC BID team would be an essential.

**Aspirational projects:**

Whilst it is understood that this type of Plan is required to concentrate on what can be knowingly achieved, nevertheless there is a case for putting together some kind of “shopping list” of projects that could eventually become part of the Council’s future plans.

Such a list would stimulate interest and input, and give a pointer to the future, and could help in seeking investment or public funding.

A CHP retrofit scheme for a town centre, acoustic barriers to busy traffic routes, improvements to particular pedestrian and cycle paths, pressing for large retail to be placed in a separate use class from local shops, a replacement Civic Hall/performance space in the cultural quarter in Wimbledon town centre: the Wimbledon Way pedestrian route project: there are many more initiatives and worthwhile aims.

None may currently have a funding stream available, but such projects may well be thought of as desirable.

Without such an aspirational list to draw on, future opportunities could be missed.

If there is a resistance to incorporating this approach, may there be a case for some kind of accompanying document, that could be seen as a menu, to be drawn down as opportunities present themselves?

It may be that the best place for this package of measures is within the sections dealing with individual areas.

There should be an active encouragement for the public to be part of the pre-application process, adding in valuable local insights to help developers in the evolution of their projects, and lessening confrontation: as someone said: whose town is it anyway?

Page 15: Would it not be helpful at the start to spell out the main thrust of the basic plan as set out in the Core Strategy, so that it sets the scene for all the details that follow?

Is there some way in which the respective policies in this document and the Core Strategy could be linked together?

**1 TOWN, NEIGHBOURHOOD & LOCAL CENTRES**

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**DMR1 – R5:** The background to this very important section is that it is generally accepted that many of our Town Centres and Parades are in decline, and a new planning and management approach is now overdue.

Without more innovative planning their future appears bleak, yet it is recognised that these centres form an important part of the life of the community, and help to create a focus for local identity.

So the task for this new plan is to reverse this downward trend, and bring in some new thinking, re-energise our centres, building on the policy CS7 in the Core Strategy.

CS7 says in summary: Wimbledon is a Major centre, then there are 3 District centres, and then 5 Local centres including Wimbledon Village, Raynes Park, Arthur Road. Outside those centres, town centre type uses are to be discouraged.

CS Table 17.2 spells out in some detail how the Council wishes to see each type of centre accommodate various uses (retail, business, residential, culture, the wide range of other uses etc), as well as dealing with tourism and design.

This table has a clarity, and is much easier to understand than the approach used in the current document, so consideration should be given to looking again at the format. The land use policies at present appear to be aimed at (although it is not easy to be sure):

- Defining Core retail frontages, where non-retail uses are restricted to 30%:
- Defining secondary retail frontages, where up to 50% non-retail can be accepted:
- Other “in the centre” frontages where non-retail uses can be fully accepted:
- Restraining the maximum sizes of retail & other units: (these differ between centres):
- Restraining amalgamations of small units into larger units:
- Restraining the maximum sizes of commercial floorspace in some centres:
- Preventing out-of-town & edge-of-town retail centres, unless they are very small local shops providing local services: or sell goods of a very restricted kind:
- Protecting corner shops:
- Allowing temporary use of vacant shops for culture activities:
- Encouraging cultural uses:
- Accepting market stalls/street markets:
- In addition, other issues for consideration are parking, public buildings/facilities and services, restaurants etc, residential/hotel etc uses, pedestrian/cycle facilities, links to public transport, pedestrianisation for special events (1.105) and urban design.

Presenting (or summarising) these policies in a table format should be considered rather than in text pages, as this could make the council’s approach easier to understand.

The proposed (a) upper limit of 1,000sqm for a unit in Wimbledon Village should not be accepted, and is far too large: larger than any other unit locally.

Accepting this figure would (a) encourage in much larger retailers, changing the nature of the Village entirely, and (b) send the message that amalgamation of smaller units could not be resisted.

The same may be the case in Raynes Park and Arthur Road.  
The phrase “unless it contributes to the council’s regeneration” (a) should be omitted, as it will send the message that the policy is able to be “got round”.

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Car parking to serve all these centres is currently geared primarily to raising finance for the council (and private owners).

This should be radically rethought, to have as the starting point the supporting and encouragement of the various centres, with free short stay, and charging levels geared accordingly. See comments on DMT3.

#### **DMR6: Culture, Arts, Tourism**

**Additional policy** required to designate and promote a “Cultural Quarter” in Wimbledon town centre, in the area bounded by the Theatre and the Polka: in which arts type uses would be promoted.

**Additional policy** required that the council would promote the replacement of the old Civic Hall as a new performance space, that would widen the offer of the town, and be able to cater for special events as well as performance.

The sites known as P4 and P3 have been identified for this important use in the past.

**Additional policy** required that the Council will promote the “Wimbledon Way” Olympic legacy pedestrian route, (being 2012 metres long), initially from the Station to the All England, and then extended to the Polka, and then westwards to the Windmill.

This urban design inspired route could be a catalyst for action on both the local design of premises with their shopfronts and pedestrian friendly uses, and as a significant input to the design of new developments beside it.

#### **DMR7 Street Markets**

**Additional policy** required that will say that markets should be located within designated centres, not in out of town locations.

To ensure that the vibrancy and crowd attraction is kept within the main retail concentrations, and make a contribution to their economic and social well being.

#### **Table 7.1 Shopping frontages**

It would be highly desirable to show this “designation of types of frontages” information on the associated location map (eg page 577 for Wimbledon town centre),

## **2 HOUSING p45**

#### **DMH2 Housing Mix**

Should not the text of this rather vague policy instead be made as clear as is described in para 2.32: in essence, why not say clearly that the mix to aim for currently should be broadly equal between one bed, two bed and three or more bed types.

For example, the policy percentages given in DMH3 are quite simple and clear.

Para 2.35 seems to have little relevance to Mix and should be included elsewhere.

An **additional policy** is needed on the re-conversion of flats back into single houses, which is resulting in a net loss of housing stock.

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#### **DMH4 Demolition of a dwelling house**

Requiring new houses to meet Code level 5 at this stage is understood: it has been the intention of HMG that code 6 is to apply in 2016, so future amendments may be needed.

**Two additional policies** should be considered.

(a) Developers may claim that if they build two or more houses, then the policy should not apply, and the policy should therefore take in this situation.

(b) Also, when (as is often now the case), a small portion of the existing house is retained (perhaps only a part of the front façade), developers are claiming that, as it is not totally new, the policy should not apply.

Again, this should be countered by a new policy.

#### **DMH5 Student Housing**

Policy a(iv) should be placed first, as over-concentration of this type of housing can be detrimental to local character, particularly if the associated lifestyles could create social tensions, or when an exodus during holiday times results in a significant drop in the local population supporting local facilities.

### **3 INFRASTRUCTURE p60**

#### **DMC1 Community Facilities**

Policy (b) should come first; the protection of those facilities that already exist should be paramount.

Also, the policy should be re-worded so that it is positive, saying that these facilities should be retained, with any loss being seen as unusual and having to pass stringent criteria. Note the clarity in para 3.4.

(a)vi should read “....have an undue ADVERSE impact .....”

It would be helpful to define “Community facilities”, perhaps in the Glossary (see 3.4).

**Additional policy** should promote the setting up of a “Cultural Quarter” based around the Theatre and Polka in Wimbledon Town Centre: also promote the provision of a new performance hall as a replacement for the lost Civic Hall, possibly beside the theatre.

#### **DMC2 Education**

There should be no distinction made between schools that are fully publicly funded and others (b). (Some schools have an element of state funding: new kinds of school are emerging: some pupils in fee-paying schools have state funding support etc).

Add to (d) .....all the criteria in policy DMC1(a) AND THE COUNCIL’S PLAN FOR EACH AGE GROUP”.

3.25 on monitoring, add: “....decisions AND WILL PREPARE A PLAN FOR EACH AGE GROUP SHOWING THE FUTURE PROVISION.” This is so that it will be made clear to the public what amount of land is needed for the expanding child population, and the broad areas where these additional sites are to be located.

### **4 EMPLOYMENT p66**

DME1 The policy is currently open-ended, and seemingly has no upper limits. The plan should include an indication of targets for growth.

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The map showing public transport accessibility in the Core Strategy is not sufficiently clear, and an improved version should be included: EG UDP figure 6.5.

Having said that, PTAL 4 is shown (in the UDP) as extending up to the beginning of Wimbledon Village High Street, which seems utterly bizarre: whereas Raynes Park, with its rail station links is only shown as PTAL 3.

Large offices should not be considered suitable in Wimbledon Village, and so the reference to them being provided should be changed (bi). Also para 4.4 & 4.8.

See also the CS7 policy referring to only "limited offices" in Village, Raynes Park, Arthur Road.

In (bi) amend to read "..... centres AND in areas with good...." (not "or").

The criteria for development (e) should be amended:

(i) ".....appropriate to the site, LOCAL DISTINCTIVENESS, and its surroundings."

And **additional policy**: (iv) "Have pedestrian-friendly street levels".

The reasoning being that many offices are bland, entirely anonymous, often quite large, have a deadening affect on the local street scene, and act as a significant obstacle to maintaining an interest for the passing public.

## 5 NATURAL ENVIRONMENT p76

**DM01b & c:** Open Space: Start with the clear policy that there is to be no building in open space unless for the purpose of enhancing its use eg pavilion:  
and in iii: only for OUTDOOR sports and recreation.

Open spaces must not be used a cheap building sites for non-open space uses, or to raise finance for open space maintenance.

**DM01e:** the visual amenities AND DAYLIGHTING of the MOL... too many developments come too close to the site boundaries of open spaces.

**Additional policy** needed to control over-development in the extensive back garden lands of residential properties, that provide so much of our green space.

Limiting the amount of building/hard surfacing or garaging into (and under) the rear garden would ensure that a reasonable amount of space for nature would be available.

**Additional policy** also needed to control the amount of front garden space that can be used as hard standing, so as to maintain sufficient green land for street side planting.

**5.9:** Make clear that any subsidiary uses must be minor and subordinate to the prime reason for having a building (eg changing facilities) in the open space: otherwise there will be pressure to build to "generate income" for the Council's open spaces budget.

**DM02f & 5.25: Additional policy** needed that spells out that the number of replacement trees should be calculated by either "Tree Years" equivalence, or "Girth" equivalence. Replace "Semi-Mature" reference, as these perform far less well than heavy nursery stock in most situations.

## 6 DESIGN p82

DMD1 These policies are not yet regarded as satisfactory.

Basic policy should say “....high quality URBAN DESIGN and protection....” Important to shift the emphasis from the (largely meaningless) concept of so called “good design” (which in practice is interpreted by most as what they like, which should not be the point

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at all) to something far more rigorous, and emphasising the importance of getting the basic massing and positioning of a development right first, and only then interpreting this in the chosen architectural forms and language.

It needs to be spelled out that the council actively wishes to support innovative architectural design, and wishes to encourage designers to break away from the sterile “keeping in keeping” pseudo styles that are constantly coming forward “because the planners said I had to do it like this to get permission”.

Paragraph 6.3 is not sufficient: this needs to be a clear policy: see below.

The order in which these policies are placed is important: we should start with the bigger issues:

Consider sub headings along the lines of: urban form & local distinctiveness, then neighbour protection, then nature, then safety and access, then quality of the new work, then the construction process.

Also, a clear policy line on Basements needs to be introduced.

Responding to the present draft text:

**DMD1a i:** Add: “...scale, density, building lines, proportions.....existing street patterns & gaps, urban layout....”

For some streets, these gaps between buildings provide a view through to the rear garden greenery, and contrast with the terraced forms; where they exist, they are an important part of the street character.

**DMD1a ii:** **Additional policy (ii)** is needed to emphasise that the council encourages innovative architectural design rather than “keeping in keeping”.

Suggested wording: (ii) “PROVIDE A HIGH QUALITY INNOVATIVE AND CONTEMPORARY DESIGN, SENSITIVE TO LOCAL DISTINCTIVENESS”;

**DMD1a v** needs to be placed third: neighbour protection is currently very poorly understood, so:

“....sunlight and daylight AND PRIVACY, quality of .....amenity space, to both proposed and adjoining GARDEN LAND AND buildings.”

Essential that the rear gardens do not have their privacy or daylighting adversely affected by aggressive new development: it is not just about protecting “buildings and their windows”.

**DMD1a viii** needs to be fourth: add in more precision, such as maintaining a proportion of unbuilt open green land on a site (varying in different locations across the Borough), as without this open-ness, we lose nature corridors, wild life, rain percolation and control of run-off, as well as enough space for tree planting:

**DMD1a iv:** “...compatible with the LOCAL DISTINCTIVENESS AND character of.....”

This is a recurring theme in national, regional and local guidance. Add a reference to “URBAN DESIGN” being paramount.

**DMD2 on Extensions:** These also are not yet regarded as satisfactory.

Unfortunately, the present draft (and the past design guidance) fails to understand the importance of urban design and neighbour protection, and concentrates mostly on the more trivial and subjective “keeping in keeping” elements.

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Only when the parameters and constraints of urban design are clear, should the designer go on to relate the extension to the form and nature of the host building.

**Policy** should again say “....quality URBAN design and....” (reasoning as above): The most important policy should be that the extension should fully respect the land and buildings of the neighbouring properties, and this should be the first to be spelled out:

**DMD2ai** should be along the lines of : “....RESPECT THE DAYLIGHTING, SUNLIGHTING AND PRIVACY OF THE NEIGHBOURING LAND AND BUILDINGS...” which means daylighting angles to all site boundaries, as well as to windows; and privacy distances between new windows (at different storey heights) and other people’s private garden land as well as their windows:

**DMD2aii** should be along the lines of: “....Respect the form of the street and its gaps between buildings”: and one could include maintaining the roof slope/ridge, resisting front dormers unless this is the street character etc:

**DMD2a viii**: insert the need for rear dormers etc to be set back from the roof eaves and not to allow intrusion of the privacy of the neighbouring gardens and properties:  
**Add policy**: “.....NO BALCONIES SHOULD ALLOW VIEWS INTO NEIGHBOURING PRIVATE LAND THAT ADVERSELY AFFECTS PRIVACY: NOTING THAT THE EXISTENCE OF TREES ETC SHOULD NOT BE USED TO JUSTIFY A BALCONY (ALL VEGETATION IS BY ITS NATURE IMPERMANENT AND CANNOT BE RELIED ON TO ACHIEVE PRIVACY)....”

The Council has for some years been disregarding its own design guidance for rear roof extensions, with the result that whilst street-facing roof slopes are maintained, the rear elevations are allowed to be built up as an additional storey. The proposed criteria in the present draft indicate that this would not be acceptable, but if the past practice continues, then there will be a mismatch between what the plan says, and what the council approves: a most unfortunate situation, leading to a lack of credibility etc.

As to the concept of “keeping in keeping” with the original, some of the most imaginative rear extensions (at ground level particularly) are entirely non-matching, yet highly commended, and have no real detrimental effect on the street, nor on their neighbours amenity.

Is this not something that should be reflected in the proposed policies, perhaps by having one part dealing with urban street forms and neighbour protection: then the next dealing with rear ground floor extensions character: and then the rest?

**Additional policy** on Basements should be placed here. Make clear that it applies to new development as well as conversions.

### **DMD3 on Managing Heritage Assets**

The Core Strategy contains only minimal “Policy” on Heritage or Heritage buildings (which need to be defined in the Glossary more than in 6.25), so the suggested draft policies need to be very clear and robust.

Work to individual sites and buildings needs a very different approach (and policy guidance) to that required when dealing with the wider area character, which could contain many disparate buildings, uses and materials.

The suggested approach is not considered satisfactory, and it would be better if the order was split so that; 10

- (a) the first section related to Listed and Locally Listed buildings and structures: protection needs to be spelled out: then importance of the various elements, the internal character, and reinstatement of features, their setting;
- (b) a second section related to Conservation areas and the much wider urban setting: protection of good buildings, the nature and character of the place, and listing what this means (building lines, street gaps, scale, height, materials, etc):
- (c) and the third section could deal with Archaeology and SAM's: zones within which site works are to be constrained by either a watching or an access condition etc.
- (d) lastly the Process, eg outline applications not accepted: full existing and proposed drawings needed for LB's.

**DMD3c** should instead be turned positively, so that "the historic building will be preserved" should be the clear policy message: with the exceptions (which developers will wish to exploit) treated as very unusual and unlikely.

The **Local List** should be included in the Appendix D, as these buildings are a significant part of the heritage, are covered by Policies, have been formally approved by the council, and therefore need to be easy to refer to.

#### **DMD4        The Public Realm**

More emphasis should be given to the importance of the scale of buildings facing the street, their height, building line, street gaps.

Also, trees and other planting in the street view can be very important in creating local character, so:

- (a) protection of root systems during construction by contractor embargo conditions:
- (b) avoidance of hard surfaces over tree root zones: service trenches ditto:
- (c) the design of front garden parking is mentioned in (f), but would it not be desirable to make a more specific point about the proportion of soft surfacing that should be maintained?

Should we not be considering:

- (a) creating new/improved public pedestrian pathways through street blocks, ditto cycleways:
- (b) creating colonnades or canopies for weather protection along town centre and retail frontages;
- (c) encouragement of shop blinds for the same reason;
- (d) encouraging a certain amount of on-street trading, not just with café type seating, but also some sales of produce etc where the footways are suitable, all to give vibrancy to the area:
- (e) protecting street traders pitches;
- (f) incorporating design initiatives such as the Wimbledon Way that would act as a catalyst, and stimulate innovative design responses in both new and existing developments.
- (g) temporary pedestrianisation of some routes for special events/processions, or for weekends;
- (h) street decorations, and a more positive approach to signage:
- (j) street furniture specifically tailored to the character of the locality:

(k) street lighting taken out of the pavement clutter, and placed onto building facades, and the phasing out of high mast lighting from areas which are essentially for pedestrians – which one might then identify in a map.

(l) and the phasing in of pedestrian paving of design quality, in town/local centres, next to important buildings particularly.

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The public realm is rightly seen as an important part of the nature and character of our neighbourhood, and it could be one of the most interesting ways in which a Council can enliven our town, and make it individual.

It is doubtful whether many of the publications referred to in 6.43 have made much difference to what happens in real life.

### **DMD5 Advertisements**

Again, it would be helpful to have some structure in the approach; one could suggest that there are different elements such as:

**Signage**, naming the building or shop: where it should and should not be on the building; and whether it could be internally lit, externally lit or remain totally unlit; (a map could show which these areas are); positioning not above fascias etc:

**Advertisements**, exhortations to buy; where they could or could not be accepted, eg opposite residential windows, in narrow footways, being a hazard to traffic, limits because of street character, temporary hoardings around building sites: removal of hoardings that harm local views or character eg Raynes Park railway embankment; affecting the setting of listed buildings, local list buildings, conservation areas etc;

**Flags** and decorations on buildings, their use in setting the scene in public spaces; eg Broadway Piazza: banners across the highway eg Broadway.

**Lighting** for special events, into trees.

Each would need to have its own policies and be treated separately and positively.

**Two additional policy** aims could be that no hoarding/advert adversely affects residents eg by being in their view from windows; and that one should ensure that advertisers have an opportunity to advertise, but in a way which is in harmony with the spirit of the place.

As currently drafted, the approach is much the same as it has always been: general sentiments, not very precisely aimed; which is why we feel that a rather more focused approach should be looked at this time.

### **DMD6 Telecommunications**

Should not the policy aim continue by saying “whilst facilitating public access to telephony” (or the appropriate description);

Is there case for having separate sections for Broadband/Cable, then Satellite dishes/antennae, transmission poles, and then Aerials. The present policy does not appear to say anything.

**Broadband:** there are issues of sheer size of cabinets in the footway, their location affecting the setting of listed and other good buildings, removal of surplus/outdated equipment; trenching for cables and adequate reinstatement;

**Dishes** etc when mounted onto buildings obviously need to point towards the SE through to the SW, but should not be seen against the skyline; or be concealed where this is possible, and not be visible on listed or other good buildings:

**Transmission poles** sited where they are unobtrusive, combined with others, accessible for maintenance, not affecting the setting of listed and other good buildings;

**Aerials** not to be seen against the skyline.

**DMD7 Shopfront design AND SIGNAGE** (which better describes shop fascias) 12

It would be preferable if the policies were phrased more positively: eg in (ai) RETAIN OR RESTORE quality shopfronts where..... and (aiv) MAINTAIN separate access..... and (av) RESTORE separate access.....have been removed WHERE PRACTICAL.

On (b), link up to DMD5: and identify areas where signage should be internally illuminated, only externally illuminated, or kept unlit.

Should there not be a requirement that all signage should (if in another language or format) have an English version included; and should incorporate a street number.

## 7 ENVIRONMENTAL PROTECTION p98

### **DMEP1 Opportunities for decentralized energy networks**

Figure 7.1 The Heat Map: Unclear what the various symbols represent.

With its very substantial buildings, many of which are prime candidates for incorporation into an energy network, Wimbledon Town Centre should identified also.

The existence of a Business Improvement District designation until at least 2017 should facilitate the setting up of a town-wide retrofit link-up programme.

A map showing the potential participant developments should be included.

The Council should also commit to publishing the total energy importation figures for the Borough from say 2000 onwards, to better understand the energy picture and how it is changing, and set a target for the future figures.

Also, the Council should commit to seeking funding for the setting up of these CHP type schemes.

### **DMEP2 Noise**

**Additional policy** required; Not only should the plan constrain noise-making developments, it should also repair the mistakes of the past by introducing noise barriers to protect vulnerable areas.

For example, the noise map 7.2 needs to be updated to include the whole length of the A3, as it does not properly recognise that the elevated section beside B&Q is close to residential areas; and where it passes beside the playing fields at the bottom of the Common it causes a considerable amount of disturbing noise over wide areas.

Introducing acoustic screening along roads is very common in many European countries, and should be joint venture with the RB of Kingston.

**Additional policy** should be included that controls the timing of on-site construction activities and limits them to hours that respects the amenity of local residents.

### **DMEP3 Allowable solutions**

The Society is not able to comment on this as information on what the scheme entails has not been examined. It is not yet clear whether such a scheme will end up as an excuse for developers to avoid making their projects energy efficient. Clarification is needed here.

## 8 FLOODING & DRAINAGE

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### DMF1 Flood Risk

The proposed policies permit development where flooding is expected to happen; this should not be accepted.

It does not seem sensible for any vulnerable development to be built in the future in any areas that are liable to a flooding risk, and the policies should be changed to reflect this.

There should be an **additional policy** for the protection of existing vulnerable uses particularly housing that now lie in potential flood zones.

These should be protected by mitigation measures such as drainage back-check systems, bunding, and retro-fit detailed modifications to individual properties.

### DMF2 SUDS

**Additional policy** should require the provision of attenuation measures, that will hold back storm water, and then slowly release it.

These usually take the form of either holding ponds, (the flood plain itself has a major role) or, in urban areas and town centres, below-ground attenuation chambers.

## 9 TRANSPORT

p119

The headings could be simplified as sustainable transport, transport impact of development, car parking & standards, transport infrastructure, and access to road networks.

DMT1/2/3/4/5 Policy (c) for enhancing pedestrian and cycle routes is welcomed: But this should be expanded, with **additional policies**.

Creating new paths through development sites where there is a significant block to movement on a locality (eg Mansell Road through to Worple Mews);

Widening existing narrow routes: and

Eliminating steps that limit everyday use by re-shaping the route (eg the rail bridge steps from Alt Grove, and the railway path steps behind the St Georges Road development).

Rather than go through the draft transport sections in detail, the issues that need addressing include:

- Pedestrian and cycle routes – (see above);
- Car parking: on-street parking for centres needs to be radically changed in emphasis, away from the doctrinal approach to maximizing income for the council, and towards actively supporting the vulnerable town and neighbourhood and local centres, many of which are deteriorating;  
Free short stay for example should be seriously considered for wide use and carefully tailored to ensure that the community attractiveness and economic health of the individual centre is maintained. Without such a pro-active approach and a fundamental shift in parking charging, many centres will continue to decline, become impossible for local firms and services to continue.

Also, the numbers of parking spaces that are needed to properly service the operation of all these centres is of vital importance, being both on-street and off-street, both publicly and privately provided:

And there needs to be co-ordination of their charges and free periods;

14

- Access to new developments is currently too formulaic: the principal design criterion should be the character of the locality and street, and not the preferred traffic solution. An example is the Edge Hill development where many local houses have their access direct from that street, yet the new development had to have an internal service road, which seems perverse and a waste of site area. Traffic doctrine requirements have to be secondary to good urban design and local distinctiveness, and an **additional policy** should make this clear.
- There should be better access to stations (for example from Alexandra Road), and better connections between the stations and the bus stops, with weather protection.
- Wimbledon Station needs to be improved, prior to the bringing in of the various service enhancement projects.
- Traffic signaling should be set to control vehicles speeding:
- Allowable Traffic speeds in both residential areas and town/local centres need to be reviewed, and 20mph zones extended, with regulating measures and “policing” improved.

## **APPENDICES**

p135

### **Appendix A Transport**

A.1.2: 05TN Should there be a reference to Crossrail 2 for Wimbledon Station (see page 215)?

A.1.4: 12TN Include semi-pedestrianisation in 12TN (see pages 215/219)?

A.1.7: 23TN Include a reference to the Wimbledon Way pedestrian priority route, initially from the Station to the All England Tennis, as an Olympic Legacy project 2012m long: and then extended along the Broadway to the Polka, and along Parkside to the Windmill.

### **Appendix B Open space**

p139

Described as “Proposals”, but these are surely defined areas where a specific Policy applies, and not proposals? There are no “proposals” for these spaces in the schedule.

B.1: Add “including Royal Wimbledon Golf Club” to the Wimbledon Common entry?

Add “and AELTC/Aorang Park” to the Wimbledon Park entry?

Some sites appear in more than the one schedule, which could be confusing eg Wimbledon Common, which is also shown as having two different sizes: ditto Mitcham Common.

### **Appendix C Natural environment**

p146

Again, these are surely defined areas in which specific policies in the Plan will apply?

C5 Consider adding the river bank (moorhens etc) & site W007 at Rookwood Road.

### **Appendix D (See also DMD3) Listed buildings & Conservation areas**

p148

This should include not only the listed buildings but also the **Locally Listed buildings**, as these are a significant part of the heritage stock, and are covered by the Plan policies.

D.3 Suggest make clear that the figures quoted for the percentages of grade 1 and 2\* listed buildings relate to the national stock:

Comparable figures for the Merton stock would be..... (3, 10, c200?).

Some gradings have not yet been entered.

The Old Rectory in Church Road Wimbledon seems not to have an entry....

The White House should be in Wimbledon (not Windmill) Hill Road.

Drinking fountain at Belvedere ditto.

The Old Windmill is presumably in Windmill Road off Parkside.

**Appendix E Archaeology** p157

A note saying that these areas are identified on the Proposals Map would be helpful.

**Appendix G Flooding** p160

A note saying that these areas are identified on the Proposals Map would be helpful.

**Glossary** p180

Consider adding: Flood Zones: Heritage Assets: Historic Building: Locally listed building: Community facilities: PTAL:

**PART TWO: "PROPOSALS MAPS" see separate document**

**DRAFT "POLICIES" MAP 1/2013**

**THE WIMBLEDON SOCIETY RESPONSE TO THE LBM STAGE 3 DOCUMENT tm/jr**

**DRAFT 7 March**

Part 2A: **Policies Maps** (Previously known as the Proposals Map)

**MOL Boundary: The Common:** page 206 & others:

See comment for page 586, suggesting a revised boundary for the Common MOL in the War Memorial area.

MOL: page 207 & 502: A010: **Oakwood Road. MOL reduction.**

Previous MOL designations, in the Council's formal plans, included this end property as part of the MOL greenway strip which links Oakwood Road to Cottenham Park Road.

Many properties exist in designated Green Belt (MOL is equivalent to Green Belt says the London Plan) and the practical effect is that they are only able to increase their building footprint by a small amount, so as to retain the open-ness of the GB/MOL. This is being constantly re-affirmed by Inspectors' decisions at appeals. Removal of the MOL designation in this case would allow significant rear extension, or within-rear-garden development, perhaps as PD. This would add significant building footprint into what is currently an open area. So the originally defined MOL designation should therefore be retained as existing, and the proposed modification should not be accepted.

**Conservation areas:** page 208:

The **Archaeological** map and the map showing **Scheduled Ancient Monuments**, which were shown in the previous draft, do not appear to be present in this draft. Could they both with advantage be included on the conservation area map?

**Transport Proposals:** page 215: 04TN & 08TN: **Wimbledon Station & Crossrail 2** and Tram works:

Suggest add phrase: "WITH ADDITIONAL PEDESTRIAN ENTRANCES TO THE ENLARGED STATION, FROM ALEXANDRA ROAD AND/OR QUEENS ROAD."

This is to make the Station more accessible from the local area, and avoid the need for all passengers to use the existing single entrance to what will be an even more important and busy rail interchange.

It also keeps open the possibility of a pedestrian/cycle link route across the tracks at the northern end of the Station.

Additionally, include a reference to the desirability of bringing in escalators and better lifts for this enhanced station.

The essential point here is that the Crossrail 2 and other track and service improvements need to be accompanied by significant improvements to the actual station building itself.

**Transport Proposals:** page 215: 12TN:

Suggest Add phrase: "...pedestrian environment, INCLUDING THE **WIMBLEDON WAY**, WITH SEMI PEDESTRIANISATION AND removal of one way system."

This is part of the current Olympic Legacy proposal being formulated by a working group, about to be considered in more detail by the Council.

## **SITE PROPOSALS**

2

SITE MAP B2: page 271: **Green Corridors:**

Consider adding Wimbledon Hill Road (northern side), being a link between Town and Village.

This is far more than a line of street trees, it is a significant green strip, and part of a conservation area, and an integral part of the Wimbledon Way.

SITE MAP B2: page 280: **Open Space:**

Consider adding in the open green area at the front of **Eagle House**, Village High Street: A private space, used for garden plus vehicle parking, but in full public view, with several trees; listed railings as well as a listed main building.

Roughly the same size as the enclosed private Galustian Garden off St Mark's Place.

SITE MAP 32: page 282 & 423: **Open Space:**

Consider adding the car park site 65 to the existing open space (M024) (above the northern line tracks to **Morden**), to facilitate more active play & provide tennis courts etc. Currently, the open space is too narrow to provide for much active play.

SITE MAP 34; page 329: **Fire Station, Mitcham:**

In the Cricket Green conservation area: Would the relocation of the archaeological centre from its present temporary building (to the north of the Vestry) allow the rather unattractive hut to be removed, and a significant local archaeological centre created within the vacated Fire Station building?

SITE MAP C2: page 441: **Green Chain:**

Should the green strip (The Chase) between the Kingston Road and Merton Hall Road be included, being contiguous with the rail strip and an open space? The open space beside the school and Merton Hall Road is not shown, but is shown map C2 on p449.

SITE MAP D1 etc: page 442: It would be helpful to show a **feint mapping** of the areas immediately outside the Borough boundary; (this applies generally to all such maps).

SITE MAP C2: page 449: **Open Space:** Dennis Park Crescent & Toynbee Road: Should not the open space at the corner of Dennis Park Crescent be included as a small open space? Ditto the space beside Toynbee Road?

SITE MAP C2: page 449: **Open Space:**

The **Bowls Club** (site 74) bounded by Kingston Road, Lower Downs Road and Abbott Avenue should be shown as containing open space.

SITE 41: page 479: **Kingston Road/Lower Downs Road:**

Consider the introduction of a roundabout, as the traffic and pedestrian movements at this unusual and busy intersection are causing some concern.

Additionally, improve the pedestrian and cycle crossing of the busy road, noting the important routes to local schools, to the nearby Station and to The Chase pedestrian and cycle greenway.

Both of these changes are likely to require some setting back at the boundary of the site, with a widening of the public highway.

### 3

SITE map ref: I 3: page 502: **Oakwood Road MOL:**

The MOL boundary should not be cut back at Oakwood Road, but remain as before. There are many other properties which exist within defined MOL's, and the practical effect is to allow the Council to limit the amount of building mass that can be added via extensions.

(see comments on page 207).

SITE C1: page 505: **Green Chain routes:**

Consider adding a Green Chain pedestrian route along the southern edge of the Raynes Park Waitrose public car park, then along the public footway beside the green railway embankment, and onwards to follow the long railway path to Wimbledon Station.

Consider adding the small green area below the raised flyover to site GC01.

Consider adding to the Green Chain pathway to the south of site GC01 (S044), so that when it meets the public path alongside the Beverley Brook, it turns southwards and

takes in the small green open space (site W007) at the end of Rookwood Road, and then passes over the existing pedestrian bridge into the LB Kingston.

SITE SINCS: page 512: **SINC**:

Consider adding site W007 (Rookwood Road) as a **SINC**, linked by the riverside path alongside the Beverley Brook.

SITE 49: p525: This Post Office site is presumably in Cranbrook Road, not Hillside.

SITE P3: p529: **Hartfield Road Car Park**:

The list of Council preferred uses should include the **Bus Station**:

Also, the future of this site should be formally linked closely to that of Site 28 beside the Theatre.

This is so that the essential provision of a significant public cultural Hall and leisure facility, as a replacement for the old Civic hall, is not allowed to lapse, by one site being developed without such a provision, and then the other being shown later to be unable to accommodate a **Hall/Performance Space**.

Both sites are in the freehold ownership of the Council, so this linking should be properly formalised in the plan.

If there is to be a proper Performance Space on either site, then it is unlikely that it would be practical to include with it any residential uses, due to the noise and general activity that would accompany the operation of such a public facility.

Whether **public car parking** should be re-provided on the site should be left open for later discussion when the parking facilities for the whole town centre have been studied. A potential site for incorporation in the Town centre **CHP** scheme.

SITE 12: page 533: **Queens Road Car Park**:

The Society's comments in the previous consultation, that the site is not considered at all suitable for residential because of noise, poor orientation, have not been taken on board.

The view remains that use for residential is quite inappropriate, as the long service road would adversely affect the amenity of neighbouring properties, and also mean that the orientation and external private space of any new housing would be very poor.

SITE 16: page 537: **Wimbledon Library**:

Additional notes for the "Issues" section should be added, as follows:

- (a) This is an important public building beside the Wimbledon Way pedestrian route, and its presence, and usefulness to passing visitors, makes it a significant part of the local heritage and character;
- (b) In order to facilitate what should be effectively the pedestrianisation of St Mark's Place, there should be no vehicular access to the Library complex from St Mark's Place, nor should any car parking be provided there;
- (c) A new pedestrian access to the Library site should be encouraged from St Mark's Place, together with access to any cafes etc, in order to maximise the use of the space;
- (d) The potential use of St Mark's Place for market activities should be borne in mind.  
A potential site for incorporation in the Town centre **CHP** scheme.

SITE 28: page 543: **Car Park beside Wimbledon Theatre**: (P4)

The future of this site should be formally linked closely to that of Site P3, the Hartfield Road car park site.

This is so that the essential provision of a significant public cultural Hall and leisure facility, as a replacement for the old Civic Hall, is not allowed to lapse, by one site being developed without such a provision, and then the other being shown later to be unable to accommodate a **Hall/Performance Space**.

Both sites are in the freehold ownership of the Council, so this linking should be properly formalised in the Plan.

If there is to be a proper Performance Space on either site, then it is unlikely that it would be practical to include with it any residential areas, due to the noise and general activity that would accompany the operation of such a public facility.

Whether public car parking should be re-provided on the site should be left open for further discussion when the parking facilities for the whole town have been studied.

This is a site that lies within the Town Centre's proposed Cultural Quarter, which extends from the Theatre along to the Polka. In this area the intention is that Arts type uses should be actively encouraged, and this should be reflected in the preferred uses. It should not be "just another development".

A potential site for incorporation in the Town centre **CHP** scheme.

SITE 31: page 547: **Wimbledon Community Centre**, St George's Road.

*(council owned: community uses, retail, offices, housing, or hotel)*

It would be important to ensure that, if this site is to be developed with only minimal community facilities in the early stages of the Plan, that there is a secure undertaking from the Council that the provision of a full range of replacement community facilities is to be provided by the Council on a nearby site. Such an undertaking would need to be more robust than undertakings given when the Civic Hall was demolished in the 1980's. A potential site for incorporation in the Town centre **CHP** scheme.

SITE 37: page 549: **Wimbledon Greyhound Stadium**, Plough Lane:

*(sporting activity plus "enabling development");*

*.....But football stadium plus retail and housing appears to be favoured by the Council).*

The Council's references to future uses (under "further research") are not supported.

Significant retail on this site, being far from any town centre, would be quite contrary to plan policy, would not pass the sequential test process, and should not therefore be accepted.

Being within the functional flood plain, no housing whatever would be appropriate for this site. The Environment Agency is quoted as saying that, in relation to housing, it "does not believe that any mitigating measures can address the issues associated with the functional floodplain".

By contrast, the provision of some modern office/creative businesses, light industrial, employment and depot facilities on a site of this type should be considered: there is a major grouping of such uses adjoining (mostly in LB Wandsworth).

There is an opportunity here for relocating some industrial users from other local sites in Merton, which could then be freed up and utilised for housing or school etc.

If the sporting heritage of the Plough Lane area is to be properly planned for, a new pedestrian route should be sought to link (for example) Durnsford Road with Riverside Road in Wandsworth.

This would improve accessibility, supplementing what would probably be the main pedestrian access to the site from the north, Earlsfield being the closest mainline station.

SITE 62: page 557: **Wimbledon YMCA** in The Broadway:

The preferred uses should major on community, leisure, culture and hostel/hotel.

This is an important site on the Wimbledon Way pedestrian route, and is also within the proposed "Cultural Quarter" that extends between the Theatre and the Polka. It should therefore have Arts type uses that reinforce this route, with active frontages containing the appropriate cultural supporting activities.

A deeply set back public space, facing south and perhaps partly glazed over, would positively enhance the Wimbledon Way route, and mirror the "Piazza" that lies westwards along the Broadway.

This would allow the public and users of the new development to enjoy a break from the busy traffic, and enjoy winter sunshine, being on the northern side of the street.

The height should be no higher than the CIPD building opposite, to avoid creating a canyon effect.

There should be no traffic entrance from The Broadway, to avoid breaking both the active frontage interest, and the Wimbledon Way pedestrian route.

Potential for a shared service road from Trinity Road, capable of being extended westwards to serve the rear of the Broadway premises if desired.

A potential site for incorporation in the Town centre **CHP** scheme.

## 6

SITE 63: page 561: **Highlands House**, The Broadway, next Southey Road:

This site is within the proposed Culture zone, and the preferred uses should therefore include "Culture and the Arts".

The height should be no higher than the nearby CIPD building, to avoid a canyon effect, particularly as the site is on the southern side of the Broadway, and therefore casts a substantial shadow onto the northern footway throughout the winter months.

Accordingly, it should also maintain the gap which now exists beside 153/161, to avoid creating an unbroken and solid frontage, so as to allow sun and view through into the Broadway as now.

The northern elevation should be parallel to the CIPD building frontage, to maintain the established "echelon" pattern, which does not here follow the building line: and be no further forward than the existing main façade.

Tree planting space in the forecourt area should be encouraged.

The scale of the development must respect the scale of the housing to the south.

There should be no traffic entrance from the Broadway, to avoid breaking what should be an active frontage.

There is potential for a shared service road from Southey Road, which could link to the service area at the rear of the adjoining development site.  
A potential site for incorporation in the Town centre **CHP** scheme.

SITE 64: page 563: **12 Ravensbury Terrace**, Wimbledon Park:  
Site adjoins a “Warehouse” building now used by creative industries etc, and which could be a candidate for local listing.

The river at this point has a very special sylvan and natural character, with green banks. Setting back the building from the water’s edge would enhance the green character, and the creation of a riverside walk or terrace should be considered.  
It has been said that there may be a culverted stream along the northern edge of the site.

Consideration could be given to a new pedestrian/cycle bridge across the river, linking Haslemere Avenue to Groton Road and onwards to the Earlsfield local centre and rail station, as an alternative route to the busy Ravensbury Road.

Given the proximity to Earlsfield station, the suggested PTAL rating of 3-4 seems too low.

Given that the site is within the functional floodplain, residential use (which even if on upper floors will still require street level access) is considered quite inappropriate. Offices and creative industries would be appropriate, given easy access to central London clients etc from the nearby station.

SITE 70: page 567: **20 Ravensbury Terrace**: Wimbledon Park:  
The river at this point has a very special sylvan and natural character, with green banks. Setting back future buildings and access roads etc would allow the enhancement of the green-ness of the river bank: noting that this green setting, and the “rear” elevation of any future building on this site, would be in full public view to the many thousands of rail passengers passing every day.

7

This is noted on map F7 on page 607, as an element in the Wandle Valley Regional Park proposals.

Given the proximity to Earlsfield station, the suggested PTAL rating of 3-4 seems too low.

If the eastern portion of the site is to be required for rail safeguarding (map on page 611), when these have been completed, the remediation works should provide for a high quality riverside green bank, as an extension to the Regional Park.

Given that the site is within the functional floodplain, residential use (which even if on upper floors will still require street level access) is considered quite inappropriate.

Offices and creative industries would be appropriate, and the large vehicles required for industry/storage would then not be needed in these small scale streets.  
The Wimbledon Park Primary school lies to the west; school use therefore could also be added to the preferred list.

SITE 71: page 571: **Weir Road/Durnsford Road**: Wimbledon Park:

Clearly identified on map B2 on page 592 as part of a large swathe of protected industrial and employment land, this site should not be considered appropriate for any kind of residential use.

With some housing nearby, office or creative industries could be appropriate on the southern and western parts of the site.

High grade protection (floods etc) of the electrical substation buildings should be paramount, being part of the vital local energy infrastructure.

Page 577: Map of **Wimbledon Town Centre**:

It is suggested that the small site, bounded by St George's Road, Alt Grove, and Tabor Grove, should be added into the defined town centre site, as it contains a number of commercial premises (solicitors, architects, travel firm etc).

Page 578: Map of **Wimbledon Village**:

Consider addition of the short parade of shops and the Church on the Ridgway, and bounded by Lingfield Road and Sheep Walk Mews: it contains hairdressers, restaurants, and a shop unit currently to let; noting that the short parade further west on the Ridgway is (rightly) shown as defined (page 583).

Consider adding the small block at the rear of (approx) 32 – 38 High Street, being the Doctors Surgery, and some offices.

Consider omitting the end properties 44 & 45 High Street, beside Lingfield Road, as both now appear to be residential.

Page 580: A **general point** about the drawing of the red line around these defined sites: The red line defined street block beside Kingsley Road (for example) shows a "slot" which appears to indicate that it does not form part of the defined Parade: would it not be simpler to show the legal boundary of all the properties, rather than follow the outlines of current buildings? As is generally done with conservation areas?

Map i1: Metropolitan Open Land (MOL): (**Wimbledon Common**): Page 586:

According to the maps of the Common produced by the Conservators, it appears that the Common extends across "The Green" to include the land occupied by the War Memorial, and also the small area of green space beside number 4.

These two areas therefore, should (subject to a check with the Ranger's Office) be added to the MOL. This correction will be needed to a number of maps in the document.

8

Map i1: MOL: page 586: The green area beside Woodhayes and bounded by the **Crooked Billet**, (M043 on page 595) and being opposite Wright's Alley and Southside House, should be shown as part of the MOL.

Map B1: page 591: **Green Chains** etc: Add the areas mentioned in page 586 above.

**Green Space** List: page 595: B2 listing:

Add the private open space in front of Eagle House, High Street, Wimbledon Village.

Map B1: page 599: **Open Spaces** in Wimbledon:

Add the War Memorial and Green areas (see page 586).

Add the private open space in front of Eagle House, High Street, Wimbledon Village.

Add the half circle at the junction of Murray Road and Southside.

Map B2: page 600: **Open spaces** in Wimbledon:

Add the private open space in front of Eagle House, High Street, Wimbledon Village.

Map **Cycle Network**: page 610:

Consider adding a Proposed/Potential future cycle connection from Haslemere Avenue across the river to Groton Road in Wandsworth (see page 563 comments above).

It would be helpful to have a “logical” listing of the different types of route: eg:

- \* Entirely Segregated:
- \* Segregated and within The Common and open spaces:
- \* Shared with footways by marking:
- \* On the roadway but marked out as a side strip:
- \* Signposted but not marked out:

Consider (where steps are shown) “Future elimination of steps” in the key.

The potential for a radical improvement of the current cycle path facilities is very evident, but the whole Plan currently is still very low key on this issue.

### **OTHER POINTS**

- \* Map A2: page 590: As some of these “**greenspace**” maps do not aim to show “other” defined open spaces, might it be helpful to make this clear by perhaps a note on the various relevant maps?
- \* The layout, with the splitting between the five parts of the Borough, is sometimes confusing: we have for example some sites appearing in more than one section of the document; eg Pitcairn Road as Colliers Wood 80, and as Mitcham 18:  
Or Pelham Road appearing as Colliers Wood 22 and as Wimbledon 22:
- \* We also have the “Land use zoning” maps (which have a hopefully long life) appearing with the much shorter life “Sites”, many of which will drop out when they are developed.
- \* Has enough thought been given to the opportunity to create new public footpath/cycle links through sites when they are developed (eg Pitcairn Road)?
- \* Mention the importance of creating a proper frontage to Holborn Way (Mitcham 69).
- \* Will not the loss of so much public parking in Morden (eg 60) damage the town centre?

.....  
ends e&oe

**DRAFT 7 March**