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To:- Strategic Policy & Research
Future Merton
Attention Tara Butler
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4 April 2012

**PUBLIC CONSULTATION
DRAFT SITES & POLICIES DEVELOPMENT PLAN DOCUMENT
AND DRAFT PROPOSALS MAP, together with CIL & CHARACTER STUDY**

.....

The responses of the Society to the Consultation Documents are Attached, being:

- Draft Sites & Policies
- Potential Sites for new uses and Proposals Maps
- Society list of Major Policy issues
- Borough Character Study
- Community Infrastructure Levy.

We look forward to continuing the helpful discussions with the Council and yourself as the production of the Plan progresses.

.....
The Overall Planning Policy Context is set by: National (NPPF) and Regional (GLA plan)

One could suggest three main headings: **Protection, Design Standards, Positive Action.**

The first two set the “Design Framework” for the scheme Architect to work to.

.....
PROTECTION OF WHAT WE HAVE:

Neighbour Protection	from aggressive new development nearby, excavations, daylighting, privacy, sunlight, noise
Green Spaces protection	from development on them & beside them
Heritage Buildings, Archaeology, & Localities protection	Listing, Conservation, grants, ADQ
Local Character	Building lines, heights, scale, materials, trees, unbuilt land
Tree Protection & compensatory planting	TPO's, protection/retention, “Tree Years” replacement
Community Buildings protection	from loss, ensuring comparable replacements
Resisting loss of particular uses	Green land, housing, employment, local shops, bus routes
Shopping frontage uses	Protection from fragmentation, saturation by non-shops, resisting out of town centres

DESIGN STANDARDS AND CRITERIA:

Local urban design & character	Environmental Surveys and assessments; grants
Energy & Water Efficiency, & Sustainable Construction	Code 6 by 2016 & BREEAM
Housing quality & space standards	Outlook, Outdoor space, room sizes, lifetime homes
Parking & access requirements	Dimensions, on-site provision
Zones of varying development intensity	Character, local distinctiveness, public transport access

.....
POSITIVE PROMOTION AND ACTION:

A set of creative proposals by Council and Others

Freeing of Architects to create innovative designs	within the above “Town Design” framework
Energy Generation & minimal energy importation	Grants, CHP schemes
Creation of better pedestrian & cycle routes	Short cuts, weather protection, accessibility
Public Transport improvements	Bus, Rail, Tram, & Interchanges
Physical Enhancements of public realm, open spaces, heritage building grants	
Specific new proposals for improvement	in Town Centres, run-down areas, Conservation areas

GENERALLY

4/4/12

The DPD as adopted should have an introduction (as in the existing UDP p3) with an explanation of the Borough Development Plan, as it will be when adopted. It would need to cover the NPPF, the London Plan, the Core Strategy, as well as the present Sites and Policies DPD and its associated Proposals Map. There should also be a reference to Supplementary Planning Documents, including future plans for additions to the list.

Also, it would be important to lead with a list of the Council's principal planning objectives and major policy thrusts. The Society has produced its own list showing some of the planning issues it sees as important, and this is submitted separately.

It is also important that all the policies should be shown to "derive" from the Core Strategy policies, and it would be helpful for this to be identified.

We have been assured that the present policies in the UDP have been transferred into the new documents, unless they have been removed by HMG.

The UDP Policies were quite precise, and set out clear guidance, but the new policies are expressed in far more general terms, and seem to lack the earlier precision.

There is significant concern about the failure to replace the Built Environment and Natural Environment policies on which the Society has depended in making its representations to resist unwelcome developments.

Also, the protection of Neighbour amenities seems not to be addressed by a single policy, yet it is seen by the Society as one of the most significant issues in controlling development in dense urban areas. This needs to be given far more emphasis.

As to the management of Heritage assets, this seems to be dependent on the extensive production of character appraisals and design guides for conservation areas etc, and the work programme for these has lacked enough resources.

Accordingly, given that the broad directions are spelled out in the Core Strategy, should not this Policy Document spell out the Policies very much more clearly?

Relying on a future subordinate set of (as yet unseen) SPG's is seen as problematic. It is not clear whether, or how long, the present set of SPG's will stay in use.

This is a most significant point for the Society. We do not yet feel that this draft plan has enough precision and "teeth" to control development adequately.

In more detail, the accompanying maps would benefit from having (perhaps in faint outline) some details of the adjoining Boroughs.

eg roads, rail lines, open spaces and MOL

Should there be footnotes in the text, to indicate references to London Plan, Core Strategy, or SPG?

The Society's comments which follow are of course mainly concerned with the western half of the Borough. A small number of points on the important town centres of Mitcham & Morden are raised to stimulate discussion, as these form such a vital part of the whole that is Merton.

COMMENTS IN MORE DETAIL

Reasoning is in italics

Page 5: DMR1 policy aim: "...range of shops, services AND COMMUNITY FACILITIES, to meet....."

Town Centres need to have a very wide range of attractions, not just shops etc.

(a) i Suggest that each of these policies starts with the places where they will apply, thus....."In Wimbledon, Mitcham, Morden, Colliers Wood, development that provides a range etc..."

Rather than placing the locations at the end

It could be argued that the large retail developments that have been built in Mitcham around the Fair Green area have done little to contribute to the wellbeing of the centre. Is the figure of 1000 sqm appropriate?

(a) ii The introduction of new retail space of up to 1000 sqm is considered to be far too great for Raynes Park and Wimbledon Village, which are small scale centres. This figure should be much reduced, and the caveat about "unless" removed.

P5 1.2 "...provide civic, retail, COMMUNITY/SOCIAL/LEISURE and other...."

The range of town centre uses should be recognised more clearly please

P7 1.11 Should there not be a reference to shopping frontages here, before the Neighbourhood Parades?

P11 DM R3: first para: Suggest omitting the last two lines about vacancy rates: so as to read: "...all local shops are within walking distance of all residents in Merton".

If there is an issue about vacancy, this should have its own policy

P13 DM R4: The grading of the various shopping centres and frontages should be made clearer, as should the definition of "Primary" in relation to the "Central, Core and Secondary" and "Designated" (and presumably undesignated) frontages.

P15 para 1.53 Suggest omit last two lines, so as to read: "...Amusement Centres are not considered appropriate uses in core shopping frontages."

P17 DM R5 (a) Food & Drink etc uses Add: ".....unacceptable impact on local amenity AND RESIDENTIAL AREAS, and the general environment...".

The negative impact on residential property in and around the town centres is now clearly seen, and the Plan Policies need to change to address the issue

(a) vii Add: "Hours of opening". And a reference to the Council's powers under the Licensing Acts:

These late night opening hours are very significant, and the experience of town centre residents with early morning anti social behaviour has now to be properly addressed, both by the planning system and the licensing system

(c) Add: ".....an unacceptable effect on local amenity through noise, disturbance by ON OR OFF SITE BEHAVIOUR, or fumes..."

Whilst the behaviour of patrons on site can be controlled by premises managers, their off site behaviour should also be a factor in deciding whether such a use (and/or such hours of opening) can be accepted

(h) Not accepted: Any existing community or entertainment land use should be replaced on its site within any redevelopment:

Loss of such public facilities to crude market forces weakens the essential diversity and mix of land uses, which are essential ingredients in a successful town; the UDP policies rightly had this approach: see comment on DM R6

P18 1.63 Add: “.....with regards to noise, opening hours, litter control, CUSTOMER BEHAVIOUR OFF SITE, ADVERSE EFFECTS ON RESIDENTIAL AREAS...”

Reasoning as already discussed above in DM R5

P20 1.79 ADD: “.....In addition to the shopping and retail service offer, these leisure, entertainment AND PUBLIC COMMUNITY facilities makes

Many such “community” uses exist and need to be recognised as an essential and integral part of the Town’s attraction and diversity

P21 DM R6 (e) This approach is not accepted and should be omitted. Existing facilities for leisure, culture, arts, tourism etc need to be protected from crude market forces, and replaced in any future redevelopment. Allowing their loss after desultory “marketing” will result in a monoculture, and weaken the land use diversity, which is essential for a successful centre. Instead, the policy should say that all existing floorspace of this kind is to be replaced within the new development (or on a new site nearby).

When the replaced floorspace is in position, the actual leisure/community type use may of course change: as an example, the lost billiard hall floorspace in Wimbledon Hill Road was replaced in the new building by a fitness club

P26: “Amity” Grove (note that it is in the list of RP Core Frontages)

P28 DM H1 Before getting into detail, it should clearly stated that the over-arching policy is that all new Housing is to be accommodated on previously developed land.

A fundamental point, to ensure long term protection of unbuilt and open land

The approach in these policies to providing for Care homes and Supported Housing is not yet considered to be adequate.

The basic principles could be spelled out, perhaps to include the need to:

site these facilities so that local people can move in when their time comes, without having to leave their own locality and friends etc

integrate the development of supported homes into the basic fabric of the community, ensuring that their residents are able to be part of a fully functioning neighbourhood:

prevent the loss of existing facilities to crude market forces:

cater for various groups, be they ethnic, religious etc etc:

prevent an over-concentration in some areas, and an under supply in others.

It would also be appropriate for the Council to set out a quantum of how much of this kind of accommodation is needed, and where.

P29 2.8 *In a plan of this kind, the use of precise figures as here is probably best avoided: rounded figures will not become outdated, and could probably make the point just as well.*

P31 DM H2 General comment: For every development to provide the “perfect mix”, it would have to be quite large: For the rest, it would be helpful to have a sharper guidance on mix to avoid an over-supply or under-supply situation.

P33 DM C1 (b) This acceptance of the loss of Community Facilities is not accepted; see comments above for DM R6.

3.3 Add to the list of community and social uses: “.....places of worship, LIVERY STABLES, HALLS, CLUBS ETC.....”.

The stated policy to “resist the loss of these facilities” is entirely right.

P34 3.6 The loss of existing community floorspace is not accepted; see DM R6. The policy should be rewritten to make it clear that any new redevelopment should provide for at least the same amount of floorspace for “community” use within it. It may be that the use itself could vary from what was there before, and be a different “community” use, but the essential point is that unless these uses are protected by policies, the crude market forces that apply will eventually see their demise.

Such uses by their nature can provide for the very many and varied social activities that a healthy society needs, but which exist on limited resources, such as charities, special interest groups, sports groups etc etc.

P36 DM C2 It should be made clear that, in planning terms, there is to be no distinction made between schools that are funded by the State, and those that are funded independently; eg Free Schools.

(a) Add: “.....shortfall in supply, SUBJECT TO OTHER PLAN POLICIES EG NO LOSS OF EXISTING OPEN SPACE”.

Although the caveat “subject to other policies” is an accepted element in plans, because of the significant nature of school expansion at this time, it would be highly desirable to make this point positively in this policy: the same is true for point 3 in page 36 para 3.14

P38 DM E1 (c) Unclear where exactly the “Business Quarter” in Wimbledon is.

P40 4.16 Add: “.....The Council will work with landowners of existing employment sitesgreater Wimbledon Area, AND WITH THE NEWLY ELECTED BID (Business Improvement District) BOARD...”

The creation of a BID in the Town Centre is a very significant initiative, and the Business Community will become an important new player in determining the future of the Town, having its own financial resources and goals for example

P42 DM E3 (a) i Add: “.....The site is in a predominantly residential area, AND IT CAN BE DEMONSTRATED THAT ITS OPERATION HAS HAD A SIGNIFICANT ADVERSE EFFECT ON LOCAL RESIDENTIAL AMENITY...”

It is vitally important to maintain premises that can support local employment, rather than revert to housing as the market would often wish: If the use does not adversely affect the local residents, by traffic, noise, fumes etc, then it should be retainable

P38-47 The protection policies on Hazardous chemicals (UDP E10) seem not to have been incorporated.

P48 DM O1 (a) Add: “....The Council will continue to protect MOL AND ANY DESIGNATED OPEN SPACES from inappropriate development.....”

The point being that it is not just MOL that needs protection, but all open spaces.

(b) Add: “.....development conspicuous from MOL OR ANY DESIGNATED OPEN SPACES will be acceptable ONLY if the visual amenities of THE OPEN SPACE will not be injured....” and “..... DEVELOPMENT ADJOINING OPEN SPACES NEEDS TO BE WELL SET BACK TO PREVENT LOSS OF DAYLIGHT OR OVERLOOKING”.

(c) ii Add: “.... The proposal should BE ANCILLARY TO THE OPERATION OF THE OPEN SPACE SUCH AS A PAVILION.... AND BE OF A SCALE THAT IS APPROPRIATE FOR THE OPEN SPACE ITSELF.....”

This would ensure that a previously inappropriate use eg a house would not be able to be rebuilt in the open space: and that a small open space would not have to accommodate an over-large building mass

P48 5.5 Add: “.....of open space. (full stop). However, many.....changing rooms. OPEN SPACES SHOULD NOT BE USED AS CHEAP SITES FOR THE DEVELOPMENT OF LEISURE FACILITIES THAT HAVE NO RELATIONSHIP TO THE OPEN SPACE, EG RECREATIONAL CLUBS, SQUASH ETC...”

This makes it clear that only buildings that facilitate the use of open space are to be accepted

P49 5.6 “complements”

P49 5.11 Add: “.....protected from development proposals which would be visually obtrusive, OR AFFECT THE DAYLIGHTING OR PRIVACY OF THE OPEN SPACE, particularly”

P50 DM O2 (d) Add: “.....WHERE TREES ARE LOST, THE AGE OF THE REPLACEMENT TREES SHOULD MATCH THE AGE OF THE TREES THAT ARE TO BE REMOVED, AND THESE SHOULD BE PLANTED WITHIN THE DEVELOPMENT SITE. WHERE THIS IS NOT PRACTICABLE, THE TREES SHOULD BE MADE AVAILABLE TO THE COUNCIL FOR PLANTING IN THE IMMEDIATE AREA.....”

This is to ensure that (say) 3 large trees with a combined age of (say) 100 years would not be replaced by 3 tiny saplings, but instead by (say) ten 10 year old saplings; (10 x 10 = 100); a new Merton Rule for tree replacements perhaps?

P51 5.16 Add a note about the need for tree replacement (see above).

P52 DM D1 line one: Add: “...to achieve high quality URBAN design and LOCAL DISTINCTIVENESS and....”

Otherwise this will be interpreted as “building design” which is not what we should be concentrating on alone; and local character varies and is important

(a) i Add: .. “scale, BUILDING LINE, density..” Make clear that this advice should exclude existing buildings that are inappropriate in their area, too big or out of scale or too high.

*Otherwise, the ugly that happens to be nearby becomes a template:
We have to learn from past mistakes not repeat them*

v Add: “ ..AND NATURAL CROSS VENTILATIONto both adjoining buildings AS WELL AS GARDENS, POTENTIAL DEVELOPMENT LAND & OPEN SPACES”;
*This is to ensure that back gardens and open spaces, all of which are entitled to receive proper daylighting and privacy, are not closely built up to: many new developments infringe the normal entitlements of their neighbours' lands:
And to discourage single aspect new dwellings*

P52 6.1 Add: “.....respect the local character of areas within the Borough, YET ENCOURAGE INNOVATIVE ARCHITECTURAL IDEAS, and ensure....”

If the basic urban design criteria for an area are followed in a new development, and if there is no reason to follow a particular architectural language in that location, then the Council should be encouraging new ways of creating innovative and sustainable architecture of today:

*There needs to be a clear distinction drawn between “style” and “design”:
Essentially, the planning system has to design and plan the town, no-one else can do it; the architect has to design the building within the planning criteria:
Not the other way round*

P53 6.4 Add: “...but should form a USABLE consolidated area.”

Many small elements of “greenery” (often being the spaces left over after the building has been “planned”) are virtually useless: larger homogenous areas are more likely to be utilised by residents

P53 6.4A Add: “.....FOR ALL RESIDENTIAL DEVELOPMENT, EXCEPT IN DESIGNATED TOWN CENTRES, NO MORE THAN 50% OF THE SITE SHOULD BE USED FOR BUILDING OR HARD STANDING, IN ORDER TO PROVIDE ADEQUATE GREEN SPACE FOR NATURE etc, AND TO HOLD WATER RUN-OFF AND ALLOW GROUND WATER REPLENISHMENT”.

This could maintain the “green-ness” that underlies so much of the local character, and provide space for planting.

The 50% figure may need to be varied for different areas in the Borough

P53 6.4B Add a note that adequate space for children’s outdoor play should be provided in family housing.

See recent report

P53 6.6 Add a reference to the need for root exclusion zones, both during construction and in the basic site layout.

Also the need to protect the natural water table, particularly from the construction of disruptive basements.

6 Generally: Add a note that, where an existing building is capable of being retained and adapted, this is more sustainable in many cases than demolishing it and erecting a new building.

This relates to sustainability and use of resources

P54 DM D2 Suggest a re-ordering of the points to give greater emphasis to respecting the amenity (daylighting, privacy) of neighbouring property first, then reflecting the character of the area, and only then looking at the architectural issues of the original building.

So start with: Add: “... RESPECT THE AMENITY, DAYLIGHTING AND PRIVACY OF THE NEIGHBOURING PROPERTIES AND THEIR GARDENS;

then v: then iv with the addition; “respect the spaces AND STREET GAPS between buildings.....” and then the rest.

It is vitally important to ensure that the extension starts not with details about its design approach, but with the need to respect others, and then reflect the local character, and only then to think about how to detail the building itself.

It is assumed that a set of diagrams explaining daylighting and privacy standards etc would be the subject of an SPG

P56 f (i) In addition to the list of “building elements” it is important to mention that the character of a listed building also often depends on **room shapes and their proportions**, so works which change these may significantly damage the building’s historical integrity.

Also, considerable damage can result from the removal of walls and their replacement by new beams etc, all of which can result in an older building having to adapt structurally in a major way, with consequent movement and disturbance etc.

Listed buildings need to be seen as a whole, with their own inherent character, and not only as a collection of individual elements

Also, new works should relate well to the inherent nature and character of the historic building, although they may not necessarily follow the same architectural idiom.

Note that there is no apostrophe in “its” as used here

6.21 Add a reference that good design should be the aim no matter where the development is, and not be restricted to conservation areas and historic buildings.

This echoes previous Government advice in PPS 1 for example

P58 DM D4 (h) Repeat the (suggested) phrase at DM O2e above which should limit the amount of hard surfacing and building on a site to ensure space for greenery, nature, front garden vegetation, water absorption etc.

P61 DM D5 Add a phrase that says that Adverts must not adversely affect the setting or outlook from residential property.

Also that the Council will use its Discontinuance powers to remove adverts that adversely affect the local amenity and environment.

Also that adverts should be integrated into the townscape and public realm design.

DM D5 Add Policy: “...FIRMS’ STANDARD ‘HOUSE STYLE’ SIGNAGE ON SHOP FASCIAS AND OTHER PREMISES MAY NEED TO BE VARIED IN SIZE OR COLOUR TO REFLECT THE SPECIAL CHARACTER (AND LOCAL BOROUGH’S “HOUSE STYLE”) OF CONSERVATION AREAS AND HISTORIC BUILDINGS”.

Often, the standard signage of a national retailer will clash with the more co-ordinated and restrained approach that is desired in a local centre

P62 DM D6 A more precise policy line needs to be spelled out.

Add: “.....APPARATUS SHOULD BE SITED UNOBTRUSIVELY, AND SHOULD NOT AFFECT THE SETTING OF HISTORIC BUILDINGS OR AREAS, NOR ESTABLISHED LOCAL VIEWS”.

The benefits of eg Broadband services and Telecommunications need to be accommodated, but their detailed design and siting need to be properly related to their locality

P63 DM D7 Title: Rather than “advertising”, might it be preferable to use “Signage”?

a Add: “Proposals for new shopfronts AND/OR THEIR SIGNAGE or alteration...”

In many cases the (poor) design of the new signage (Advertisement Consent rather than Planning Permission) is more significant to the local environmental character than the actual “shop front”

b Add: “.....ON HISTORIC BUILDINGS AND IN CONSERVATION AREAS, THE INTERNAL ILLUMINATION OF SIGNS (OTHER THAN THOSE FOR CHEMISTS ETC) WOULD NOT BE APPROPRIATE....”

P64 6.53 Add: "... require the submission of the elevation of the whole building frontage AND ADJOINING PREMISES."

To ensure that the proposals are seen in their local context

P65 EP1 Decentralised Energy Networks: "COMBINED HEAT AND POWER"
Add: ".....The Council has identified that WIMBLEDON, Colliers Wood, Morden and Mitcham are areas of opportunity for the development of....(a CHP scheme)"

As Wimbledon Town Centre has the biggest concentration of high value town centre buildings in the Borough, and as say 20 large energy using developments (either existing or projected) are suitable candidates for a shared approach on energy generation/heating/cooling, it should be included; its omission from the list would seem to be bizarre

Add: "....THE COUNCIL WILL WORK WITH THE NEWLY ELECTED BID BOARD TO PROMOTE THIS APPROACH IN WIMBLEDON TOWN CENTRE".....

P66 7.4 Last bullet point: OMIT "WHERE FEASIBLE"

P67 DM EP2 Noise: v Add to policy: "...THE COUNCIL WILL TAKE ACTION TO INTRODUCE ACOUSTIC BARRIERS BESIDE BUSY ROAD AND RAIL LINES, SO AS TO REDUCE THE CURRENT NOISE BLIGHTING ADJOINING AREAS".

These barriers are common in mainland Europe.

There is significant noise pollution from the A3 for example, and from the high speed rail lines, much of which can be lessened by these barriers

Also Add: "...WHERE TRAFFIC SPEEDS CREATE NOISE PROBLEMS, THE COUNCIL WILL INTRODUCE LOWERED SPEED LIMITS IN RESIDENTIAL AND TOWN CENTRE AREAS".

P68 Map: the A3 for example should have the "noise" code colour along its length.
It is not only residential areas that suffer; the Common and other open spaces are also adversely affected.

P69 DM F1 Flooding: The suggested policies are not considered to be sufficiently robust.

Potentially vulnerable Development in flood zones 2 and 3 should be discouraged:
Development in Flood zone 1 should only be accepted if it incorporates protective measures, back flow controls, safe height floor levels etc, and maintains or increases flood plain holding capacity;

Should introduce flood protection measures in all flood zones, in highways, open spaces and existing vulnerable buildings, to increase their resilience;

Should enlarge the holding capacity of the flood plain, to lessen the adverse impacts on areas downstream;

Should resist the loss of natural greenspace in the Borough generally, which acts as a slow release reservoir of storm water (see comments on design later).

The accompanying table of criteria will therefore need significant amendment

P73 DM F2 SuDS It is also possible to construct large attenuation chambers (or even ponds), that collect violent storm water runoff, and then only later slowly release it into the ground or sewerage system.

P81 DM T3 Policy: Add: "....To ensure that the level of RESIDENTIAL AND NON-RESIDENTIAL parking and servicing provided is suitable FOR its location...."

Add Policy saying thatthe Council should identify the optimum parking needs of the Town Centres, both in number and type (short or long stay etc), and needs to resist any loss that impacts on this provision.

Without a well managed parking facility, each of the Borough's centres would be highly vulnerable; they have to cater properly for their customers.

Residents in and around the Town Centres also have legitimate parking needs

a Add: ".....Development should only provide the level of car parking required to serve the site UNLESS THERE IS A SHORTAGE OF PUBLIC PARKING FOR A CENTRE, taking into....."

If the assessment of a centre's parking needs is not currently being met, then additional spaces within a new development (subject to controls on pricing etc) could be appropriate

g Add: "loading and servicing in accord with FTA guidance UNLESS THIS WOULD ADVERSELY AFFECT THE CHARACTER OF AN HISTORIC BUILDING OR A CONSERVATION AREA...."

National standards of road widths or turning circles etc could be quite damaging to the local environment, and needs therefore to be modified in some cases

P85 DM T4 Transport: Add a policy that the Council will not only "protect" existing infrastructure, but will actively improve/widen (say) narrow public footpaths, rebuild steep steps up to footbridges, create new footpath and cycle links through development sites where these would improve accessibility.

This positive policy approach existed in the UDP; see comments on page 92

P85 DM T4 Add a policy that gated developments should be avoided.

See the "social mobility" point in the policy aim

P87 DM T5 Add a policy that makes clear that direct access to a road should be accepted where this is the norm, rather than follow an hierarchical pattern resulting in fewer access points, and faster traffic.

An example is the convent site in the Ridgway, where many local properties have direct driveway access, but in the convent application this was denied, with the result that the site development had to have a disruptive internal road, turning the houses back to front, & the Ridgway traffic speed is able to increase; And the Ridgway footway remains narrow and threatened by traffic speed

P90 A2.2 Rail improvements: There should be the aspiration to modernise Wimbledon Station: escalators and new lifts to all platforms; new pedestrian entrance via the service road into the District Line level concourse, aiding access from Alexandra Road; new pedestrian bridge from Alexandra Road across to Queens Road, with access to the northern ends of the platforms; a pedestrian access through from Alexandra Road to the front of the Station.

P91 A.2.4 12 TN Mention of the Wimbledon Way main pedestrian spine route, and its potential for expansion to the Windmill, and down to the eastern end of the Broadway.

This could become one of the principal urban design "structural spines" in the Town

P92 A.2.7 Add three other aspirations in/near Wimbledon Town Centre:
Alt Grove: Adapt the existing short flight of steps up to the rail footbridge, to allow prams, cycles etc to cross far more easily; Elm Grove bridge ditto.
Railway Path behind Tuition House and St Georges House: Adapt this path to raise its level at the northern end so as to create a ramp in place of the highly disruptive steps, now effectively precluding its use by prams, cycles, the semi-ambulant.

P93 B1 MOL schedule: this needs to be checked against the information in pages 95-8; Is Atkinson Morley within Copse Hill? Ditto Aorangi Park in Wimbledon Park? And Royal Wimbledon Golf is it within the "Wimbledon Common"? Does Wandle Valley include land of other Boroughs?

Suggest that the schedule of all the other open spaces follow on directly from the MOL list, with the list of school lands placed later.

The non "state funded" schools' lands should also be included.

In planning terms there should be no distinction made between schools that are funded in different ways eg Free Schools, Independent schools

P96 "All Other Open Spaces" seems to include those that are part of MOL eg MO44 the Common, MO73 Aorangi Park, PO17 RW Golf Club, PO18 Atkinson Morley, PO21 Beverley Park, PO32 Wimbledon Park Golf, M052 Mitcham Common, (is Mitcham Fair Green present?.....this needs further refinement.

P99 C Natural Environment

Suggest that, in order of importance, would not C2 be the last?

P101 D3 Clarify; ".....2% of all NATIONALLY listed buildings...."
ie this is not locally the case: ditto the figure of 4% for 2 star

P109 After the schedule of Listed Buildings, the LOCAL LIST should also be published.

This is an important reference for property owners, developers, general public

P113 G1 Highly vulnerable: some editing here would allow the reference to "coastal" and "port" to be set aside.

P114 G2 This table on flood zones should not be accepted, not being robust enough, and should be revised to accord with the comments on page 69 etc.

P115 H Saved Policies: The Society is not yet convinced that some of the important UDP policies have been satisfactorily saved by being incorporated into the Core Strategy or the current draft Policies. For example, ST 12 (development on previously developed land), which is vital if open spaces for example are to be properly protected.

P130 Glossary

It would be helpful to have some additional definitions: eg; Archaeology, Biodiversity, Brownfield, Conservation areas, Density, Flood zones, Green Chains, Listed Buildings, Locally listed buildings, MOL, Private Open Space, Scheduled Ancient Monument, etc.

P137 Bibliography

Include Site Layout Planning for Daylight and Sunlight by BRE 1991 (revised 2011).

ENDS

Site Number	Description	Society view on the Council's Proposed uses
1	P3 in Hartfield Road	<p>The prime use for this site should be for Community & Public Hall based activity: a main hall that is able to be used for concerts, performances, exhibitions, major social events, plus many other local community activities.</p> <p>Any other uses should be entirely subservient to this, and not compromise its functioning (as could be the case with housing, being noise sensitive etc).</p> <p>It is noted that the Council's preferred uses do not include car parking.</p> <p>The Council should not dispose of its Freehold.</p> <p>A major site that should become an integral part of the Town Centre's CHP scheme.</p> <p>All Town Centre sites should be planned as a group.</p>
6	Durnsford Road	The Council's suggested use as a pocket Park is supported.
8	Leyton Road	<p>Should pedestrian access routes to the Park be improved, or the size of the open space slightly increased?</p> <p>Note the archaeological importance of this area.</p>
12	Queens Road Car Park	<p>Suggested use as housing is not supported, as it would require compulsory purchase of some private rear gardens, and create housing with minimal rear space facing the busy rail tracks, and have a continuous access road all along the southern side, all creating a poor environment.</p> <p>It would also reduce the long stay parking needed for the operation of the Town Centre and main line Station.</p> <p>Instead, retain say half the site as parking, and use the other half for allotments (linking up to the nearby nature zone, or storage. Both would allow for future flexibility and a change to a rail-based activity should this be required.</p>
16	Wimbledon Library	<p>Retention as a Library supported.</p> <p>Note the current use of the basement by the market stall.</p> <p>Create new entrance to side of building from St Mark's Place.</p> <p>Pedestrianise the latter as one of the main "character" spaces in this part of the Town. A potential CHP site.</p>
19	Nelson Hospital	<p>Fine trees across the centre of the SW site should stay.</p> <p>The proposed residential use should only occupy the southern half of the SW site, to allow the northern half (with the trees) to be used for hospital parking etc, and possibly for a future expansion of the Health facilities.</p>

		<p>This ensures that there is some flexibility in dealing with future health services (which are always in flux), and which would be severely compromised if all of the SW site were to be sold off. A new pedestrian/cycle route across the site connecting Manor Gardens to Cleveland Avenue could be considered.</p>
22	Pelham Road	<p>Retaining Health function supported; the incorporation of housing could compromise the operation of a health centre, and a subsidiary non-residential activity is suggested.</p>
23	Amity Grove	<p>An opportunity exists to significantly improve the present public footpath route, which is narrow and feels threatening. Future development should therefore provide for a much improved public footpath route as an integral part of its design.</p>
24	Morden Road Clinic	<p>Should consideration be given to relocating this health facility and placing it within the defined Morden town centre, to give it greater prominence, and also to broaden the diversity of uses in the Centre. Its vacated site could then be used for other purposes.</p>
27	Merton Hall	<p>The loss of the present Community use is not accepted, and this use should be an integral part of any new development. Setting back any development to provide excellent daylighting to the adjoining Bowling Green should be ensured.</p>
28	P4 beside Theatre	<p>The incorporation of Housing could compromise the proper operation of public-orientated activities, being highly susceptible to noise.</p> <p>Also, this is a site that should provide for additional Town Centre uses, rather than residential.</p> <p>The potential for incorporating a use that could extend and enhance the Theatre activity should be fully examined with its operators.</p> <p>Loss of existing car parking should be resisted whilst the P3 site is being redeveloped.</p> <p>A potential CHP site together with the Theatre.</p> <p>The future of all Town Centre sites should be decided and planned as a group.</p>
30	Home Park Rd	<p>The use of this wedge shaped site as housing is not accepted. Rail noise, and the narrowness of the site should indicate that it should either remain a small green oasis, or possibly that one housing plot could be created at the northern end, and the rest remain green and unbuilt, a nature zone.</p>
31	Community Centre	<p>The location of this Centre, away from licensed premises and residential etc, yet close to the Station, enables it to be used easily by vulnerable groups, particularly in the evenings. The principal use should remain as a Centre for the Community, perhaps with other social/civic uses, and there should be no suggestion of housing or hotel type uses.</p>

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| 34 | Raleigh Gdns
Mitcham | <p>Simple street level parking is very much needed around the Fair Green area, and the present use should not be lost as a short term financial gain.</p> <p>There is the potential for a rethinking of the present disruptive traffic pattern and gyratory, which now passes the site. The future of the group of sites in this area should be considered together, with the aim of bringing back the viability and attractiveness of the Fair Green area.</p> |
| 37 | Wimbledon
Greyhound
Stadium | <p>The retention of sporting activity here, as one of the long standing and well renowned venues, should be paramount. On no account should any part of such a site be disposed of for housing, which would preclude and limit sporting activities. The iconic football ground nearby has already been lost, and this should not happen again here.</p> <p>Large scale Sporting use should remain the authorized use & major activity for this site.</p> <p>Consideration should be given to exploring how a football stadium could be accommodated, for the AFC Club. It would also be expected that as part of any sporting development, public/communal facilities would be an integral part so that there would be daily use throughout the week, throughout the year.</p> |
| 38 | Colliers Wood | <p>Council's suggested use for nature conservation supported.</p> |
| 41 | Lower Downs
& Kingston Road | <p>Council's suggested use for residential supported. The existing large posters should be the subject of a Discontinuance order, as they adversely affect local amenity.</p> |
| 48 | Bushey Road | <p>Acoustic noise barriers should be an integral part of any future development. Employment uses should remain, residential being inappropriate.</p> |
| 49 | Cranbrook Road
Postal office | <p>Employment use should remain, noting the busy rail lines to the south.</p> <p>A new pedestrian/cycle path linking Cranbrook Road to the railway path, should be an integral part of any development. There needs to be a proper depot for postal staff to operate from, and this needs to be properly provided in the area by the postal service.</p> <p>The postal system is not only a delivery system, its operatives perform a valuable role in ensuring community well-being. There is an underground stream running along Cranbrook Road, which was used by the Laundry which previously occupied the site.</p> |
| 53 | Cricket Green
Mitcham | <p>Noting that Mitcham is the home of the oldest cricket Club (in the world?) consideration should be given to examining how its present Pavilion (separated from the Pitch by a dangerous road) could be re-accommodated.</p> |

		Should site 53 be considered for this, accommodating a new Pavilion (with only a minor road to cross to the pitch), and then leaving the site of the present Pavilion to be redeveloped later for housing etc?
55	West Barnes	Use for Nature Reserve. Is there also an opportunity to use this site to increase the holding capacity of the flood plain? Is there a need for a public footpath leading westwards?
62	YMCA Broadway	Should remain primarily in Hostel type use, together with public amenities (Health, Creche, Community, sports etc). A potential CHP site in the Town Centre..
63	165 Broadway	Should be principally employment uses and not residential. Rear service access from Southey Road should also allow servicing to the rear of 161 Broadway, which has poor rear access currently, and uses the small scale residential cul-de-sac for its access; were this to be done, the ugly gap in Griffiths Road could be “filled in” by matching housing etc. A potential CHP site in the Town Centre, with 161 & CIPD.
Grouped Sites		<p>Page 100 Wimbledon: para 3: the reference to “Tall” buildings should not be accepted.</p> <p>On the contrary, it should be clearly stated that no building along the Broadway should be any higher than the present CIPD building.</p> <p>Add after the last paragraph: A significant Public Hall suitable for a range of big venue performances, conferences etc needs to be an integral part of the future development package, and would add significantly to the range of facilities and “offer” that the Town can make.</p> <p>And another reference to the potential for a major CHP scheme throughout the Town, centering on the bigger new developments, as well as the retrofitting of existing buildings.</p>

PROPOSALS MAPS

Page	Comments
18	Flood Zone 1 should be shown also.
22	<p>Definition of the Wimbledon Town Centre boundary: Suggest that the eastern corner of Tabor Grove be retained in the TC, as it has offices etc.</p> <p>Should not the Alexandra Road terrace be retained in the TC, being beside the railway.</p>
26	Raynes Park: should not the new Library building be included, together with the Station? The relationship between this “Local Centre” map and the designations on the “Shopping Frontages” map on page 69 are unclear.

- Should not the latter have an extended area, to match the Local Centre and also show all the frontage designations?
- 29 Wimbledon Village: the area should be extended to include the Tesco store on the corner of Ridgway and Wimbledon Hill Road.
Should the Church and the adjoining shops/restaurants also be included?
- 49 Kingston Road; should the terrace of shops at 330 – 344 be included?
- 62 CSF14 “Amity”

The titling (Core, Secondary, Central, Primary) is very confusing and would gain from a simplification: could they be in a clearer hierarchy?
Should shopping centres come immediately after section C centres?
- 65 Fair Green: Should not the Area boundary be drawn to include the actual sites, not just the buildings? This would then include the (ugly) triangle east of Holborn Way, the car park of Morrisons, and the (ugly) car parking areas of the properties fronting onto Upper Green West?
All incidentally are of such a dreary appearance, and with such a deadening affect on the locality, that they should be considered for infilling development?
- 66 Morden: Should not the boundary include the Civic Centre and the associated shops, and the shops opposite?
- 68 North Mitcham: Should not the boundary include the Station?
- 69 Raynes Park: Should not the boundary include the new shops at the junction of Worple Road and Lambton Road, and the offices and new Health Centre at the southern end of Lambton Road? (see page 26)
- 70 Wimbledon Village: The Tesco store site should be included in the defined area. It is confusing to see on all the map keys that the “Wimbledon Central” notation is repeated, but not relevant in the great majority of cases.
- 71 Wimbledon Town Centre: Should not the boundaries be extended to include: the shops in St Mark’s Place, the Library, and St Mark’s and its Hall: the old Post Office building, the shops facing onto Alexandra Road, and the Station itself: the Bathroom showroom on Worple Road opposite Elys: the Mews behind the Broadway conservation area: the Theatre and its adjoining car park site.
- 77 Maps: it would be helpful to have at least some indication of the mapping of the adjoining Boroughs shown. (eg see page 97)
The proposed inclusion of all the open spaces on the Proposals Map (not just the MOL) is very much to be welcomed.
- 79 Continuation of the MOL zoning (equivalent to Green Belt) across the Camp Road housing site would allow a tighter restriction to be placed on future extensions, that could otherwise further erode the green-ness of this area. This was included in the UDP MOL (= Green Belt) land zoning.

- 80 Should not the Galustian Garden, at the end of St Mark's Place, be included as an open space?
- 83 Add on the small triangular space at the northern end of Rookwood Avenue, beside Beverley Brook, as shown on map page 95 next GC07.
- 84 Should the long sliver of green space between the two carriageways at the western end of Merantun Way, recently given a good stock of trees by the Council, be included?
- 92 An additional Nature Reserve site could be added, being site 30, the triangle of land beside the rail lands in Home Park Road.
- 95 The Green Corridors shown are primarily in the public view. Should there not be a companion map which shows the very considerable corridors that exist along private back gardens? These currently perform a major function in providing havens and migrating routes for wild life, yet are prone to loss by back garden development. Identifying them would provide a criterion for assessing whether a back land project could be disruptive to wild life.
- 100 The (eastern) bank of the Beverley Brook on the western boundary of the Borough, (perhaps indicated by the map code MeB014?) are green and there are moorhens, various wild birds, water marginal plants etc present. It is not clear whether this space (which has a public footpath along part of it) is designated as a Site of Nature Conservation importance, but a case could possibly be made.
- 116 etc The "continuation" of the transport routes outside the Borough boundary would be helpful on these maps.
- 120/1 An additional map showing some proposed pedestrian (and cycle) improvements, would be desirable. See for example the suggestions in the comments relating to page 49 (Cranbrook Road link), the Wimbledon Way (page 91), the railway path ramping and the steps removal to the rail bridges (page 92), a possible access to the Station via Alexandra Road (page 91).
- 122 There should also be a map showing the proposed Bus Improvements. For example the changes to the present bus station beside Morden Station? Should the bus lane down Wimbledon Hill Road be extended further towards the Station? Should the new bus stops outside Centre Court be connected by a covered way to the Station entrance/exit?

ENDS