



protecting our amenities ... enhancing our quality of life

By Email

30th August 2013

ldf@merton.gov.uk

Dear Sirs

Re Responses to the Draft Policies

I attach the Wimbledon Society's responses to this consultation for your attention.

Yours faithfully

John Mays

Chairman
Wimbledon Society
Planning Committee

A: Transport Proposals:

A1.4 page 150: Wimbledon Town Centre Public Realm improvements:

ADD: “.....and pedestrian environment, **WITH ADDITIONAL PEDESTRIAN ENTRANCES TO THE ENLARGED STATION, FROM ALEXANDRA AND QUEEN’S ROADS: ENHANCEMENT OF THE WIMBLEDON WAY PEDESTRIAN SPINE ROUTE, WITH SEMI-PEDESTRIANISATION AND THE.....**removal of the one way system.”

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

And to continue the earlier initiatives by the Council and others to the creation of a special pedestrian spine route through the town centre, which is already shown on the Council's street signage maps.

A1.7: page 151: 24TN: Fully **support** the proposal for an additional pedestrian/cycle link to Earlsfield Station. Also pages 358 & 361.

A1.7 page 151: Pedestrian/cycle routes: The “Wimbledon Way” should be shown:

ADD: 25TN: Wimbledon Town Centre and Village:
“NEW WALKING ROUTE ‘THE WIMBLEDON WAY’ EXTENDING FROM THE POLKA THEATRE TO THE COMMON AND THE ALL ENGLAND TENNIS GROUNDS, VIA THE STATION”.

This route is already shown on the Council's street signage maps.

B: Open Space: page 152

B1 page 152: MOL: Assume that the Royal Wimbledon Golf Club and the playing fields have been included within the “Common” site description: The Common itself is said to be some 267 hectares, rather than the much larger figure quoted.

Assumed that the Aorangi Park and AELTC lands have been included in the “Wimbledon Park” entry.

Suggest: **Clarify/amend the titles**, and

Make clear that the open spaces which have been designated as MOL, **are listed again separately** in B4, B5 etc: eg SO45, M001, MO50, MO56, MO77, MO104 etc.

SO48 page 154: Address is Wimbledon: **Omit “Park.**

POO4 page 157: site changes to Education in 9/13, so **Move into Schedule B4.**

C: Nature Conservation: page 159

page A 2

C3: page 159: **ADD:** "...Atkinson Morley Hospital Woodland **AND SINC LAWN**"

C5: page 160: Sites of Importance for Nature Conservation:

ADD the **site W007** (page 158) & public riverside path beside the Beverley Brook at Rookwood Avenue: (see comment below for page 309).

.....

D: Conservation Areas, Historic Parks & Gardens, Listed Buildings

page 162

It is assumed that the information on pages 363/4 will be **amalgamated** with the Policies Maps.

ADD: The schedule of the Locally Listed Buildings after Schedule D page 170:

They are mentioned as a heritage asset (policy DMD4), and therefore should be included in the formal Plan documents for reference: they will of their nature be subject to minor updating, but this is the same with the Statutory List and Conservation Areas.

ADD a note that entries on all these schedules are subject to change, eg listing gradings could be re-assessed, items added/subtracted, new areas designated etc.

D3: Christ Church is in Cottenham Park Road not Conway: page 164

D3: Listed Buildings: the correct spelling is **Ridgway** not Ridgeway (5 entries): p167

Page 169 Drinking Fountain and The White House are in **Wimbledon** Hill Road SW19 (not "Windmill):

D3: There does not appear to be an entry for the **Old Rectory** in Church Road, Wimbledon.

.....

E: Archaeological Priority Zones & Ancient Monuments page 171

It is assumed that the information on pages 363/4 will be **amalgamated** with the Policies maps.

If the black numbering on pages 363/4 relate to archaeological zones, it could be helpful to set those numbers against the list shown at E1 on page 171.

.....

J: Glossary: page 196:

It would be helpful to include in this glossary:

Flood Zone (page 175): **Historic Building:** **Locally Listed Building:** **PTAL.**

.....

Generally: the inclusion of mapping for the surrounding Boroughs is helpful, but the shading could be lightened in the finished document, much as it was in the UDP Proposals Map of 2003, to ease readability.

MAPS: Wimbledon Page numbers (need updating) – 328/329/330/331/332:
Raynes Park Page numbers - 308/309:

(The same comments apply to the maps for Mitcham, Morden, Colliers Wood).

Walking/Cycle route is shown as a double line with some solid green and white contained within it, and positioned largely around the boundaries of designated MOL. Unclear what the meaning of the line is.

It is drawn around publicly accessible spaces, but also around private spaces, where presumably the public would not be generally able to have access:

It is also shown aligned along public roads, set away from MOL:

It clearly does not define an actual walking/cycle route, so the description in the Key panel may need to be amended.

The **key panels** showing MOL as pure green colour need to have the vertical **hatching added**, to match that shown on the actual maps.

The Key Panels have wide spaced **vertical and horizontal hatching** for Open Space and for Green Corridor that does not appear to match the close hatching on the maps: They should be identical.

Site W007 on page 309 has the hatching, but not the **green colour**.

Site PO38: page 221: This site, bounded by the properties that face onto Kingston Road, Lower Downs Road and Abbott Avenue should **all be shown as Open Space**, its current use:

The identification of only the actual bowls green as open space should not be accepted: See comments on Site 74: page 321.

Page 329: **ADD:** walking/cycle routes north/south through Atkinson Morley, and East West between sites SO45 & AO10: footpath north/south from Cottenham Park Road to Lindisfarne Road:

Page 332: The private **open green area fronting Eagle House** in the Village High Street could be shown as an open space.

It is in full public view from the High Street, behind listed walls/railings. It forms an important part of the local street scene, and contains a number of substantial trees.

It is of comparable size to the Galustian Garden off St Mark’s Place, which is also a designated private open space, although largely hidden from the public view.

Page 332: The Galustian Garden, off St Mark’s Place, which was shown in previous maps as a **designated open space** (which it is), does not appear to have been identified as such on the current Proposals Map: This should now be **added**.

.....

P3 The Hartfield Road Car Park: Site 01: page 333:

ADD: “This **COUNCIL-OWNED** site comprises.....”

It is important that this is said as the Council has a direct control over the future of this site as owner, not merely as a planning authority.

Also, the Council has in the past (1980’s) **given a formal public undertaking** that it would provide a replacement for the Civic Hall, which was to be demolished at that time, although no subsequent Council has taken steps to deliver on this pledge.

.....

P3 The Hartfield Road Car Park: Site 01: page 334: Allocated Uses:

As written, the open-ended nature of the list of potential uses is somewhat simplistic, and allows for a future developer to select only those that are commercially attractive: The other uses, although listed, may simply never be provided.

Accordingly, the Society considers that it should be clearly stated in the Plan that: **“THE PRINCIPAL USE SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY: AND ANY OTHER USES SHOULD BE ANCILLARY”**.

Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease.

It is also essential for the well-being of the Town Centre that the range of offer is made wider, something that a number of reports and studies over recent years has made very clear.

Leaving the choice of uses to short term commercial interests is a recipe for delivering more of what already exists, and would fail to deliver the diversity of the Town Centre offer that is needed.

Additionally, this is a site that should be identified as a **potential contributor to a Town Centre Combined Heat & Power (CHP)** scheme (see comments on policy DMEP1).

.....

Wimbledon Library: site 16: page 337:

It is understood that the Council, following recent statements, is removing this site from the Plan in its entirety; accordingly, no further comment is offered.

Should this not be the case, the Society would wish to make comments on whatever is being proposed.

.....

Rookwood Avenue: Site W0007: pages 160 & 309:

This site is already identified as a small open space: it is bounded by the Beverley Brook, which has a public footpath running along its eastern bank.

Because of the wildlife interest, principally water-related birds/vegetation etc, the space should be **identified as a Site of Local Importance for Nature Conservation** in the list on page 160: (see Policy DMO2 on page 87).

.....

Add: “This **COUNCIL OWNED** site is **CURRENTLY** a surface car park.....”

It is important that this is said as the Council has a direct control over the future of this site as owner, not merely as a planning authority.

As written, the open-ended nature of the list of potential uses allows for a future developer to select only those that are currently commercially attractive:

The other uses, although listed, may simply never be provided.

This site is located beside the Theatre, and is within the zone (extending eastwards to the Polka Theatre) that is identified in the Wimbledon Way study as an area primarily for culture and the arts.

This is part of the approach to widen the offer of the Town Centre so that the overall attractiveness and prosperity of Wimbledon is improved.

Accordingly it should be clearly stated that the Allocated use should be:

“THE PRINCIPAL USE OF THE LOWER LEVELS SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY, AND ANY OTHER USES SHOULD BE ANCILLARY.”

Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease.

As the Council is also the owner of the freehold of the adjoining Theatre, there could be advantages in encouraging a linking up of the two sites, should this be desired by the Theatre’s operators.

Additionally, this is a site that should be identified as a **potential contributor to a Town Centre CHP scheme** (see comments on policy DMEP1).

The loss of parking could be a significant issue for the well-being of this part of the Broadway: **ADD** therefore: **“THE REQUIREMENT FOR SOME PUBLIC CAR PARKING TO SERVE THIS END OF THE BROADWAY IS TO BE ASSESSED PRIOR TO ANY SITE DISPOSAL”**.

.....

Wimbledon Community Centre: site 31: page 345:

Add: “This **COUNCIL-OWNED** site **HAS BEEN RECENTLY DEMOLISHED AND IS TO BE USED AS A TEMPORARY CAR PARK.”**

It is important that this is said as the Council has a direct control over the future of the site as owner, not merely as a planning authority.

As written, the open-ended nature of the list of potential uses allows for a future developer to select only those that are currently commercially attractive:

The other uses, although listed, may simply never be provided.

Accordingly it should be clearly stated that the allocated use should be:

“THE PRINCIPAL USE SHOULD BE FOR COMMUNITY USE, AND ANY OTHER USE SHOULD BE ANCILLARY, UNLESS ALTERNATIVE COMMUNITY USE HAS ALREADY BEEN PROVIDED IN THE IMMEDIATE AREA.”

Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease.

Additionally this is a site that should be identified as a **potential contributor to a town centre CHP scheme** (see comments on Policy DMEP1).

.....

ADD to the Issues section, paragraph 4: “.....arrangements require careful scrutiny/improvement. **ANY DEVELOPMENT FOR SPORTING ACTIVITY MUST BE ACCOMPANIED BY AN IMPROVED PEDESTRIAN/CYCLE ACCESS ROUTE LINKING TO EARLSFIELD STATION.**”

Noting that parts of this enhanced route would lie within the LB of Wandsworth, but the improvement would be important as Earlsfield is the closest main line Station to the site, and there are also bus routes through Garratt Lane.

Concerning the reference to “more viable uses”: (page 349):
The introduction of a large foodstore, or of any use that would detract from the economy of nearby Local or Town Centres **should not be considered.**

Wimbledon YMCA building: Site 62: page 352:

This site is within the “Culture and Arts” zone, identified in the Wimbledon Way report, and the street level uses should therefore be predominantly for Community, Arts and Leisure.

As written, the open-ended nature of the list of potential uses allows a future developer to select only those that are currently commercially attractive.

The other uses, although listed, may simply never be provided. Therefore:

ADD to the Site description: “The site is within Wimbledon Town Centre, **AND IN THIS SECTION OF THE BROADWAY BETWEEN THE TWO THEATRES, ARTS, LEISURE AND CULTURE USES ARE TO BE ENCOURAGED.**”

ADD to the Allocated use paragraph: “**COMMUNITY, LEISURE AND ARTS USES SHOULD PREDOMINATE ON THE STREET AND LOWER LEVELS, WITH** a suitable mix of etc etc”.

Additionally, this is a site that should be identified as **a potential contributor to a town centre CHP scheme.** (See comments on Policy DMEP1).

165-171 The Broadway: Site 63: page 355/6:

This site is within the “Culture and Arts” zone, identified in the Wimbledon Way report, and the street level uses should therefore be predominantly for Community, Arts and Sporting/Leisure.

As written, the open-ended nature of the list of potential uses allows a future developer to select only those that are currently commercially attractive.

The other uses, although listed, may simply never be provided. Therefore:

ADD to the Site description: “The site is located within Wimbledon Town Centre.....
.....and residential uses. **IN THIS SECTION OF THE BROADWAY, BETWEEN THE TWO THEATRES, ARTS/CULTURE/LEISURE USES ARE TO BE ENCOURAGED**”.

ADD to the Allocated use paragraph: “**COMMUNITY, SPORTING/LEISURE AND ARTS USES SHOULD PREDOMINATE ON THE STREET AND LOWER LEVELS,** with a mix ofetc”.

High buildings on the southern side of the Broadway cast a substantial shadow, and in the winter months, no sun can reach the northern footway, making it sombre and cold. At present, there is a gap in the southern street facade which allows sunlight through, and this should be maintained in any redevelopment.

The height of the southern street facade should be limited in height for the same reason. Therefore:

ADD to the Issues section a new second paragraph: **“THE PRESENT GAP IN THE STREET FAÇADE SHOULD BE MAINTAINED, TO ALLOW ADEQUATE SUNLIGHT THROUGH TO THE BROADWAY. THE BUILDING SHOULD BE NO HIGHER THAN THE CIPD BUILDING NEARBY.”**

Add to the Issues section final paragraph: “...congestion and road safety. **CONSIDERATION SHOULD BE GIVEN TO PROVIDING SERVICE ACCESS ACROSS THE REAR OF THE SITE TO SERVE THE ADJOINING SITE 153-161.** Mitigate and manage.....”

The last two lines: “Council has...” should be **omitted**.

12A Ravensbury Terrace: Site 64: page 357: Ditto **Site 70:** page 361:

Transport proposal 24TN for a pedestrian/cycle bridge across the river to link to Earlsfield Station and the local centre (in LB Wandsworth), is **supported**.

Maps of Conservation Areas etc: pages 363/4/8:

The Legend should also have a note explaining the significance of the numbers: Red numbers relate to the Conservation areas list on page 162: Unclear what the black numbers (?Archaeological Priority Zone Policies?) indicate: see page 171. **Map i3:** House and Garden should **remain as MOL**. Page 368

1-7 Birches Close & 1A Cricket Green; sites 21 & 53: pages 262 & 270:

These sites face onto the Cricket Green, an area that whilst not in the immediate area of Wimbledon, nevertheless has a very significant history in Merton, including that of the evolution of the birth of Cricket.

The present Cricket Pavilion is separated from the actual playing pitch by the very busy A239 (also called Cricket Green). This arrangement might have been acceptable in past years, but is now far from ideal with modern traffic conditions.

These two sites 21 & 53 face onto the cricket pitch, and are separated from it by a very much quieter cul-de-sac. Might this present an opportunity to provide a new Pavilion on their road frontage, (with suitable development at the rear), and develop the then vacated existing Pavilion in due course?

Kingston Road/Lower Downs Road: site 41: page 314:

The intersection of four roads, together with a significant pedestrian/school children crossing load could possibly be improved by a **small amount of road widening** at the frontage of this site. This possibility should therefore be mentioned in the “Issues” section as a design element to be considered in the overall layout.

Southey Bowling Club: site 74: page 321:

As the whole of this site is currently a Bowls Club (page 321), it should all be classed as open space, not just the actual playing green. (see site PO38, page 283). The Policies Map should be amended accordingly.

MERTON DRAFT SITES & POLICIES PLAN & DRAFT POLICIES MAP

of July/August 2013

RESPONSES BY THE WIMBLEDON SOCIETY

29 August 2013

.....
For pages 1 – 147:

(For pages 148 – 394 see separate document)
.....

GENERALLY

STRUCTURE: There is a need to review the **structure of the document** so that it better meets the needs of users - both members of the public and practitioners.

Some progress has been made in this direction, but more needs to be done to enable those involved in, or affected by, the Council's development management policies to have a simple and clear way into this document, which will be the turn-to document for most users.

FORMAT: The final **shape of the formal document is not yet clear.**

The introductory pages (3 - 13) are a mixture of long-term plan material on the one hand, and background information about how the current document has been produced, and the consultation arrangements on the other.

Page 3 and the top two paragraphs on page 4 provide the clear statement about the various elements that go to make up the Local Plan, which the Society have requested.

Pages 4 and 5 are historical and might form part of a preface before the formal statutory plan is reached.

Page 6 is purely transitory.

Pages 7 - 8 are a mixture of material which might form part of a preface, and some paragraphs (such as those on the presumption) which might be better linked with the account of what the Local Plan is in pages 3-4.

These considerations apply also to pages 12-13, parts of which are, again purely transitory.

CERTAINTY

Another general point concerns the need for certainty about the force of Policies.

Some Policies are accompanied by caveats which significantly weaken their basic intention, and this could encourage attempts at evasion.

There is a need for all Policies to be reviewed to ensure that they send a clear message to applicants; and do not leave the public in doubt about the protection that Policies provide.

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.

As examples, 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 Wimbledon town centre: the Wimbledon Way pedestrian route project and its associated public realm improvements: there are many more initiatives and worthwhile aims.

Whilst none may currently have a specific funding stream currently available, such projects may well be thought of as desirable.

The advent of the CIL funding regime should be a stimulus to this approach. 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?

.....

CENTRES, RETAIL & OTHER TOWN CENTRE TYPE USES on page 14

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 and traffic 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, & 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 is clear and comprehensible, & should replace the current text. This would have the advantage of maintaining a common approach between the two documents.

The land use policies at present are not very clear in this document, but appear to be:

- No loss of retail in Wimbledon's defined central shopping zone:
- Defining Core retail frontages, where some non-retail uses are restricted to 50%:
- Defining secondary retail frontages, where up to 50% non-retail can be accepted:
- Accepting up to 70% non-retail in Neighbourhood Parades:
- Other "in the centre" frontages where non-retail uses can be 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.

DMR1a(ii): The upper limit of 1,000sqm for a unit in Wimbledon Village should not be accepted, and is far too large: larger than any other retail unit locally.

Part of the nature and character of the Village is the narrowness of the shop frontages, ensuring variety and individuality: and the smaller size of the units allows for a wider range of smaller firms to have a presence.

Accepting this figure would:

(a) encourage in much larger retailers, creating bland frontages and changing the varied and small scale nature of the Village entirely; and

(b) send the message that amalgamation of smaller units could not be resisted.

The same is the case in Arthur Road.

Therefore the references to Wimbledon Village & Arthur Road should **BE REMOVED**.

DMR1c: The reference to Wimbledon Village here should **BE REMOVED** (page 14).

DMR6: CULTURE ARTS & TOURISM

on page 37

4

This Policy is drafted in terms of regulation and, to some extent, encouragement, of cultural and arts activities. The Society considers that the Council should surely have far more **pro-active policies**, expressed either here, or in DM C1.

There should be a positive Policy of developing the area between the Theatre and the Polka Theatre as a “**Cultural Quarter**”.

Specific projects the Council should play an active part in, include provision of a new performance space to replace the **Civic Hall**, which was demolished to make way for a shopping area in the 1980’s: (see comments on site 01, page 334): and also:

Development of the “**Wimbledon Way**” pedestrian route.

This is seen as an Olympic legacy project of 2012 metres length, following the encouragement given to better pedestrian access to the AELTC for the Olympic tennis (see comments on 25TN on page 151).

A range of public realm improvements have been proposed, and the first elements are already in place.

The route is already shown on the Council’s street plans, and runs between the Station and the AELTC. It could later be extended to the east to reach the Polka Theatre and to the west to the Common and the Windmill.

DMR7: MARKETS

on page 41

The Policy rightly refers to their contribution to town centres, but there is no policy reference to ensuring that they are sited accordingly.

ADD a new policy at 1.114(c) “**NEW MARKETS SHOULD BE SITED WITHIN A TOWN OR LOCAL CENTRE**”.

HOUSING

on page 47

A general policy on Housing is surely needed (as none is provided in the Core Strategy), that will provide the context for the detailed policies.

DMH2: HOUSING MIX:

on page 53

The Society has noted that the Council has received a number of applications for the re-conversion to single dwellings of houses that have, in the past, been split into a number of flats.

This is leading to the loss of useful housing units, at a time when there is a shortage of housing, and when policy dictates that London’s population will continue to grow.

The Council's response has been to say that they will keep a watch on the situation - presumably with a view to possible action in the future.

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In the Society's view the evidence of loss of housing is already clear, and the opportunity to develop a policy to deal with this situation should not be missed.

The present Policy wording does not give intending developers a clear idea of what the Council expects, and an **easier to understand approach should be produced.** (see for example the table at 2.34)

Paragraph 2.37 (gated communities) seems to have no place in a policy on Mix, and should be located elsewhere in the document, perhaps in a new general policy.

DMH4: SINGLE DWELLING HOUSES: on page 57

It has been the Government's intention that **Code level 6** should apply from 2016, which is only a year or two after the Policies in this document will come into effect.

This Policy should therefore recognise this and provide for an increase in the Council's required Code (5) level, when the Government introduce the higher figure.

As this Policy applies only to total demolition, it is likely to be open to avoidance by developers, and additional criteria should be included.

There have been several recent cases where demolition of a structurally sound house has been very extensive but not complete; where a small portion of the front facade is retained, ostensibly to protect the street scene.

The result is a virtually new house but built to a lower Code level.

To achieve the Council's aims on sustainability, the policy should apply to houses where the demolition is more than 50%, rather than total demolition.

ADD: DMH4(d): "THE POLICY WILL BE APPLIED TO HOUSES WHERE MORE THAN HALF OF THE HOUSE IS TO BE DEMOLISHED".

The same policy should also apply to the demolition of two semi-detached (or adjoining) houses, as to a single house.

.....

DMC1: COMMUNITY FACILITIES on page 63

The protection of the facilities that exist should be paramount.

Therefore the wording of Policy **(b) SHOULD COME FIRST & BE STRENGTHENED.**

The Policy should start from the position that existing facilities should be retained, and any loss would be unusual and governed by strict criteria – see the wording at the end of para 3.4 of the justification.

As currently written, the retention of existing facilities is inadequately protected. An additional Policy is needed to meet the past undertakings by the Council for a replacement of the Civic Hall in Wimbledon Town Centre, being:

ADD DMC1(c): “THE COUNCIL IS COMMITTED TO PROMOTING THE PROVISION OF A MAJOR PUBLIC HALL IN WIMBLEDON TOWN CENTRE”.
See also the comments on Site 01, the Hartfield Road car park, page 333.

An additional Policy is required to reflect the emergence of the Wimbledon Way project, and its proposals for the eastern end of the Broadway. This would widen the current Town Centre offer, and encourage a range of new activities.

ADD DMC1(d): “THE COUNCIL AIMS TO ENCOURAGE A CONCENTRATION OF CULTURE, ARTS AND LEISURE-BASED ACITIVITIES AT THE EASTERN END OF THE BROADWAY, BETWEEN THE THEATRE AND THE POLKA THEATRE”. See also the comments on sites 28, 62, 63.

.....

DMC2: EDUCATION FOR YOUNG PEOPLE on page 66

For over 5’s (policies (a) – (d)), the current shortage of school places emphasises the need for a clear and publicly available plan for provision of places. The reference to annual monitoring in para 3.14 of the justification is welcomed, but the need for planning for future provision should be reflected in the Policy.

This might be achieved by the addition of a new (first) policy item providing for an overall plan, with details for each age group, or by an addition at the end of item (d).

Day Care for under 5’s should have its own policy, utilizing (f) – (h).

Para 3.22 (page 68) refers to schools having sole use of parts of open spaces, yet does not relate to or derive from any stated policy. Exclusion of the public from a public open space is a major issue and goes against policy DMO1, and therefore should not be accepted.

DELETE: Para 3.22 therefore should be omitted.

.....

DME1 EMPLOYMENT AREAS on page 70

Policy aim: Should be amended to read “.....minimize the need to travel”.

ie OMITTING the reference to “**BY CAR**”, as providing the opportunity for local people to get to their local workplace easily should be the aim, by whatever transport mode is available; congestion on buses and the rail system also needs to be addressed.

DME1b: The **PTAL maps** that are referred to do not seem to be included. The previous UDP map (2/2003) was described as having unverified PTAL data. An up to date version is therefore needed.

The previous rating for Raynes Park (at only PTAL 3, yet having a mainline station and several bus routes) should be checked.

7

DME1e(i): This design point is welcomed, but should include a reference to local character, so amend to read:

ADD: “All proposals for development should (i) have layout...etc....appropriate to the site, **LOCAL DISTINCTIVENESS** and its surroundings.”

Note that similar phrase is already used in the Plan at DMT5 on page 146 when describing the design of the road network.

DME1e(iii): The local amenity of residential property near employment sites also needs to be protected, so suggest amend/add to read:

ADD: “All proposals for development should.....(iii) not adversely affect traffic movement or road safety **OR THE AMENITY OF LOCAL RESIDENTS**”.

DME2 OFFICES IN TOWN CENTRES on page 74

Policy aim: Should be amended to read “.....minimize the need to travel”.

ie OMITTING the reference to “**by car**”; the reasoning is as above for DME1.

DME2(c) Add a policy that encourages new offices to be less bland, anonymous and having no interest for the passing public: so amend (c) to read:

ADD: “Ensure that all proposalsnor create significant car parking problems **AND HAVE PEDESTRIAN-FRIENDLY STREET LEVELS**”.

.....

DMO1 NATURAL ENVIRONMENT on page 83

DMO1b(iii): **ADD:** “...the development is for alternative **OUTDOOR** sports and recreation...”. The London Plan specifically says this at para 7.56. Otherwise, open spaces can be lost to indoor sports and recreation buildings.

DMO1d(iv): **ADD:** “**THE DEVELOPMENT IS FOR OUTDOOR SPORTS AND RECREATION**”.

DMO1f: This policy is welcomed: **ADD:** “**....BY REASON OF MASSING**, siting, materials or design.”

This ensures that the bulk of nearby development does not have an adverse effect on the quality of the open space.

DMO1g: To make clear that any partial loss of Open Spaces is covered by policy; **ADD:** “**ANY LOSS OF PROTECTED OPEN SPACE WILL BE RESISTED UNLESS EQUIVALENT PROVISION IS MADE IN THE LOCAL CATCHMENT**”.

See for example London Plan paragraph 7.56B.

5.3A: In order that the Council's policy is fully understood, the justification at 5.3 should be strengthened, as follows:

8

ADD: "...guidance. **THE STRONGEST PROTECTION WILL BE GIVEN TO MOL, WHICH HAS THE SAME LEVEL OF PROTECTION AS THE GREEN BELT. ANY DEVELOPMENT IN MOL SHOULD BE LIMITED TO SMALL SCALE STRUCTURES THAT SUPPORT OUTDOOR OPEN SPACE USES**".

The addition underpins the Council's basic policy point about protection, and makes clear that open spaces must not be regarded as cheap building sites for non-open space activities.

The wording is specifically derived from the London Plan policy 7.17 & para 7.56.

OPEN SPACES: 5.8: As written, this paragraph could allow the incursion of other uses into open spaces, which would be contrary to basic policy. This should be clarified therefore by:

ADDING: line 2/3: "Where redevelopment (*of pavilions etc*) can provide for more than one **OPEN SPACE COMPATIBLE** use, the...."

.....
DMO2 NATURE CONSERVATION: on page 87

The policy of protecting and enhancing biodiversity is welcomed. In addition to the green corridors mentioned, there are very significant green zones formed by the rear gardens of residential properties.

Such zones provide not only for nature and a diverse range of wildlife, they accept large quantities of rain water, control runoff, replenish ground water stocks, and act as a moderator to temperature etc, as well as creating a significant amenity & play zone.

Development into these rear garden spaces should therefore be controlled. It is therefore suggested that there should be an addition to policy (b) as follows:

ADD: after DMO2b: ".....other landscape features of amenity value; **AND MAINTAIN A SIGNIFICANT PORTION OF REAR GARDEN SPACE.**"

5.25: ADD a justification, using the points above. Paragraph 6.32 could be noted.

5.29: The use of semi-mature trees is often problematic in urban sites, and the more successful approach is often to use heavy nursery stock.

When trees are lost in a development site, replacements are usually of a very much smaller size than those lost.

In order to ensure that tree stocks are not depleted when established trees are cut down, there should be a replacement policy to that balances the new and the lost. One way of doing this is by adopting a "**Tree Years**" measure, in which the age of the older lost trees is matched by the age of the young replacement trees.

REVISE 5.29 to read: “WHEN TREES ARE LOST IN A DEVELOPMENT SITE, THE COUNCIL WILL REQUIRE REPLACEMENTS THAT MATCH THE COMBINED AGE OF THOSE TREES THAT ARE LOST; ie A “TREE YEARS” POLICY. WHERE THE APPLICATION SITE IS NOT ABLE TO ACCOMMODATE ALL THE REPLACEMENTS, THE SURPLUS ARE TO BE PLANTED BY THE COUNCIL ON SUITABLE SITES IN THE LOCALITY”.

It is suggested that the issue of whether semi-mature or heavy nursery stock are used can then be left for decision in individual cases.

.....

DESIGN

on page 90

The ordering of this important Chapter would be improved by;

- (a) putting the present **DMD2 FIRST** (as was the case in the earlier draft), as this has the principal design parameters spelled out, and
- (b) having a **SEPARATE POLICY FOR BASEMENT WORKS** rather than adding it to the Design policy: as can be seen, it is very extensive, and rather dominates the rest of DMD2.

DMD1 URBAN DESIGN

on page 90

ADD: Additional policy after (b) which also relates to building and spaces:

“THE RESPECTING OF LOCAL BUILDING LINES AND GAPS IN STREET ELEVATIONS, WHICH ARE THE PRINCIPAL ELEMENTS IN FORMING THE SCALE AND CHARACTER OF A LOCALITY”.

DMD2 DESIGN

on page 94

Generally: This should be **RE-POSITIONED** to be **the first of the Design Policies**.

Consideration should be given to placing the detailed policies from (a)i-ix under **separate sub-headings**, for example:

Urban form & local distinctiveness, Neighbour Protection, Safety & access, Quality of the new work, Construction issues.

This would then emphasise that, in planning terms, the design process has to start with the location, then neighbour protection, and only later go to considering the actual building. Too often, applicants start with the building and only later try to “fit it in” to the locality: and neighbouring property interests are often ignored until too late.

DMD2 (a)

on page 94

ADD: “THE COUNCIL WISHES TO SUPPORT AND ENCOURAGE INNOVATIVE MODERN DESIGN THAT UNDERSTANDS LOCAL DISTINCTIVENESS, RATHER THAN A PASTICHE APPROACH”.

Development that superficially harks back to supposedly earlier “styles” should have no place, and contributes little to either present or future generations.

It also fails to realise the potential opportunities that modern technology can bring. This should be the **FIRST** policy (a), with the present (a) becoming (b).

DMD2(ix)

10

ADD: “.....Ensure that trees and other landscape features are protected **BOTH DURING CONSTRUCTION, AND WHEN DEVELOPMENT IS COMPLETED. ANY REPLACEMENTS SHOULD BE ACHIEVED VIA THE “TREE YEARS” APPROACH**”. (See comment on 5.29 above).

The construction phase, although short in the life of the new building, is often very destructive of trees etc.

DMD2(x) DESIGN

on page 94

ADD: “...that landscaping forms an integral part of any new development where appropriate, **AND THAT AT LEAST HALF OF THE REAR GARDEN SPACE IS RETAINED UNBUILT**”. (see for example para 6.32 & comments at DMO2).

This would ensure that a significant amount of potentially green land could be maintained, for biodiversity corridors, water husbandry and run off control, amenity when viewed from neighbouring properties, and children’s outdoor activities.

DMD2(xiv) DESIGN

on page 94

ADD: “**ENSURE THAT THE APPROPRIATE CODE/BREEAM LEVELS ARE ACHIEVED BY INCORPORATING THESE AS INTEGRAL PARTS OF THE OVERALL DESIGN, RATHER THAN AS ADD-ONS**”.

“Designing” a new building, and then adding on to it some supposedly energy-saving gizmos, is losing the opportunity to build in an innovative way.

DMD2b BASEMENTS:

on page 95

There is significant interest in having a policy on Basements, and this new approach in response to earlier consultation is welcomed.

The range of Policies set out in DMD2 are rather unbalanced by the Basement addition, and therefore it is suggested that:

THE SECTION ON BASEMENTS SHOULD HAVE ITS OWN DMD POLICY.

ADD NEW POLICY at (b)(x) “WHERE PRACTIBLE, BE SET WELL BACK FROM PROPERTY BOUNDARIES”.

It appears that there is significant disquiet when basement works abut the property of neighbours. Whilst the Party Wall Act legislation is then usually utilised, the inherent difficulty of placing “stiff” modern construction under or beside “flexible” foundations of earlier buildings can still cause problems.

Achieving some horizontal distance between foundations appears to be one way of lessening this issue.

ADD NEW POLICY (d): “BASEMENTS CONTAINING HABITABLE ROOMS IN FLOOD PRONE ZONES WILL NOT BE ACCEPTED”.

See the Council's similar policy DMF1 para 8.16 page 127.

DMD2 6.15 onwards:

on page 96

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ADD a paragraph at 6.16: The justification for the preceding **Policy (a)v** on sunlight and daylight etc (which is welcomed) needs to be clearly spelled out. It should come before the other paragraphs, as it should shape the whole design, and is currently very poorly understood by applicants.

HEADING: "**NEIGHBOUR PROTECTION**"

6.16 NEW TEXT: "**NEW DEVELOPMENT MUST RESPECT THE DAYLIGHTING, SUNLIGHTING AND PRIVACY OF ADJOINING PROPERTIES INCLUDING GARDENS. DETAILED GUIDANCE WILL BE CONTAINED IN MERTON'S DESIGN SPD**". The section on "High Quality Design" at 6.16 then becomes 6.17.

DMD2

on page 98

para: 6.30 ADD AT END: ".....demonstrate that the integrity of the listed **OR UNLISTED** building will be unaffected".

Locally Listed buildings are classed as Heritage Assets, & need basement control.

DMD3 a

Alterations & Extensions

on page 100

The emphasis of this policy as drafted is on the detailed design of the alteration, where **instead** it should be to respect firstly the prevailing street forms and local distinctiveness, and then the amenity of adjoining gardens and properties.

Only when these design parameters have been understood should the detailed design of the extension be produced.

Also, it is clear that there are many examples of rear extensions that are of high design quality, respect neighbours etc, but do not adopt the architectural idiom of the host building. The desirability of "keeping in keeping" in such situations needs to be questioned, and in some cases is not of any consequence.

The ordering of the Council's policy headings should therefore be amended as follows, to put the important elements first.

(a) New subtitle: "**LOCAL AREA CONTEXT:**"

respect street gaps	as set out in	(iv)
wider setting	"	(v)
roof forms	"	(ix)
roof materials	"	(vii)
materials	"	(v)

(b) New Subtitle: "**NEIGHBOURLINESS**" (or respect for adjoining property):

ADD NEW POLICY: "**ENSURE PROVISION OF APPROPRIATE LEVELS OF DAYLIGHTING, SUNLIGHT, PRIVACY TO ADJOINING BUILDINGS AND GARDENS**". (similar to para 6.18)

ADD NEW POLICY: “THE PRESENCE OF TREES ETC SHOULD NOT BE USED TO ACHIEVE PRIVACY, AS THEY ARE BY THEIR NATURE IMPERMANENT”.

12

A new Policy here is essential to guide applicants. Unless an extension is designed from the outset to respect the legitimate expectations of neighbours on these issues, difficulties and delays and objections will be the result.

noise & disturbance as set out in (vi)
dormers as set out in (viii)

(c) New subtitle: **“THE PROPOSED STRUCTURE”**

Form & bulk of the original as set out in (ii)
Detailing as set put in (i)

DMD4 MANAGING HERITAGE ASSETS on page 102

As is the case with the Extensions policy above, the sub headings in this policy should be re-ordered: policies for works to an individual building need a different approach from policies that deal with whole areas.

It is suggested therefore: the first policy should cover the **actual buildings**:

So items c,d,f:

The second should cover **Conservation Areas and the Setting**:

So item b:

Thirdly a **NEW POLICY** is needed to cover Archaeology and Scheduled Ancient Monuments:

ADD: “WITHIN THE DEFINED ARCHAEOLOGICAL ZONES, PROPOSALS WILL NEED TO DEMONSTRATE THAT A DESK-TOP STUDY HAS BEEN EVALUATED. ARCHAEOLOGICAL CONDITIONS WILL BE APPLIED WHERE ACCESS AND/OR SITE EVALUATION ARE DEEMED NECESSARY”.

Justification: “The Council considers that archaeological remains are fragile, and should generally be preserved in situ, with new development designed around them: their future exploration and evaluation will then remain possible”.

Fourthly the policies on the **application process**:

So item e.

Para: 6.49: Which lists Heritage Assets: on page 103

ADD at the end of the list “SCHEDULES OF LISTED AND LOCALLY LISTED BUILDINGS, CONSERVATION AREAS AND SCHEDULED ANCIENT MONUMENTS ARE SET OUT IN THE ACCOMPANYING APPENDIX”.

It is important that Locally Listed Buildings are also included, as they are clearly Heritage Assets, and specifically covered by Policies.

A NOTE SHOULD BE ADDED to each of the Schedules in the Appendix, that they are subject to change: this is so for Conservation Areas, Listed Buildings etc.

The encouragement for the setting up of such networks is welcomed, as it could lead to a reduction in fuel importation into the Borough, and potentially deliver more economical energy to developments in town centres.

Future development schemes should be expected to demonstrate that their heating and cooling systems are capable of being adapted and connected into a future DE network, if this becomes available.

The Council should not only identify suitable areas, it should **promote** them.

Wimbledon, Merton’s largest single town centre, with a significant number of big developments both existing & future, & capable of forming into a town-wide energy network scheme, is unaccountably omitted from the map, **and should be added**. The existing BID status could provide an aid in the setting up of a scheme.

ADD: to Policy: “The Council will identify **AND PROMOTE** areas of greatest opportunity for the development of decentralised energy networks.....”

ADD: to Map 7.1: **AN ADDITIONAL AREA BASED ON THE WIMBLEDON TOWN CENTRE.**

As background, see the Commons Energy & Climate Change Committee report of 8/8/2013, which recommended “financial aid to support medium size renewable energy generating systems”.

Should such financial support become available in some form, as seems likely, then the Council needs to be in a position to put forward proposals for suitable funding.

.....

DMEP2 **Noise** on page 114

ADD: to Policy: “.....have significant effect on existing and future occupiers **AND NEIGHBOURS**, or the local amenity.....”

ADD: to Policy after (iv): **(v) THAT NOISE FROM THE CONSTRUCTION PROCESS DURING DEVELOPMENT IS CONTROLLED”.**

ADD: to para 7.14: “.....examples of noise-sensitive land uses are hospitals, housing, schools **AND OPEN SPACES”.**

As an example, the wide area of the Common is susceptible to significant traffic noise, principally from the A3, which is partly in the RB of Kingston, but skirts the Borough boundary.

.....

DMEP3 **Allowable Solutions** on page 117

The Society is unable to comment on the merits or otherwise of this type of scheme at this time. There appears to be a danger that, by making suitable payments, new developments could be able to avoid meeting Code/BREEAM targets.

.....

DMEP4 **Pollutants** on page 119

ADD: to Para 7.30: “.... Therefore development that may result in an adverse impact to local air quality, **INCLUDING DURING CONSTRUCTION**, may require....”

15

DMF1

Flooding & Drainage

on page 122

The proposed Policies permit development where flooding is expected to happen, and this is regarded as unacceptable.

It does not seem sensible that vulnerable development should be built in any areas that are liable to a flooding risk, and **THE POLICIES SHOULD BE RADICALLY CHANGED TO REFLECT THIS**.

Additionally, there should be an additional policy for the protection of existing vulnerable uses, particularly housing, that now lie in flood-prone zones.

ADD: after (a)v: (a)vi: (The Council will) **“SUPPORT ALLEVIATION MEASURES THAT WILL REDUCE THE RISK OF FLOODING TO EXISTING VULNERABLE USES, PARTICULARLY HOUSING”**.

ADD: after (a) vi: (a)vii: (The Council will)..... **“NOT ACCEPT BASEMENT SCHEMES WHICH INCLUDE HABITABLE ROOMS”**.
(This follows the wording in para 8.16)

DMT

Transport

on page 132

Car parking on Town and Local centres needs to be reconsidered, both in the number of spaces available and the cost of parking.

Currently the aim of the Council appears to be the maximizing of income from parking charges, but this needs to be tempered by the need to ensure that businesses in the centres are able to prosper, whilst not promoting car travel where it is not desirable. Anecdotal evidence suggests that short-stay charges are far too high, and are adversely affecting business activities.

The current draft Policy DMT3 deals only with car parking within Developments, and which is accessible to the occupants or users of that development.

But a very significant amount of local parking is provided on the public highway, and in publicly owned car parks, and planning policy should control these.

ADD NEW POLICY AFTER DMT3: “THE COUNCIL WILL REVIEW THE WAY IN WHICH PUBLIC CAR PARKING CHARGES ARE SET, TO ENSURE THAT TOWN & LOCAL CENTRES & PARADES ARE ABLE TO FUNCTION EFFICIENTLY”.

Control of traffic behaviour, by speed reduction zones, or sequenced traffic lights etc, appears to be delivering environmental benefits to both centres & housing areas. An additional policy should indicate the Council’s support for such measures.

ADD NEW POLICY AFTER DMT4: “THE COUNCIL WILL SUPPORT THE INTRODUCTION OF SPEED CONTROL MEASURES, WHERE THIS WILL IMPROVE LOCAL ENVIRONMENTAL QUALITY”.

FOR COMMENTS ON APPENDICES: p148-394 SEE ACCOMPANYING DOCUMENT
