WIMBLEDON SOCIETY: LB MERTON PLANNING POLICIES

A simplified summary 6/15

Sites and Policies Plan adopted in July 2014

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The Local Plan consists of:
- The National Planning Policy Framework (NPPF)
- The London Plan 2011 & subsequent amendments
- Merton's Core Planning Strategy 2011
- The South London Waste Plan, and
- **Merton's** Sites & **Policies** Plan & Policies Map

There are also Supplementary Planning Documents, which set out more detailed guidance.
Each policy usually has detailed criteria & explanations which also need to be read.
These **Policies** are **very much simplified** here: they are summarised as follows:

	Policy	*page*
CENTRES		
Protect **Town Centres & Local Parades** eg Village, Wimbledon, Raynes Pk, W/Park	DMR1	12
Locate **town centre-type uses** in "sustainable" locations, & have **local shops** within walking distance for all residents	DMR2	16
Protect **corner shops**	DMR3	19
Protect **shopping use** in defined shopping frontages, with other uses allowed depending on the category of the frontage eg: central, core, secondary, other, neighbourhood	DMR4	22
Accept **food & drink uses**, pubs, takeaways, leisure/entertainment subject to various criteria	DMR5	27
Accept smaller **culture/arts/tourism** uses: & also the larger facilities when they are in centres, or areas well served by public transport	DMR6	32
Accept improvements to **Markets** in town centres (& some others)	DMR7	36
HOUSING		
Make no new provision for **gypsies/travellers**, but keep under review		41
Accept housing for **supported care** for the vulnerable, & secure housing for institutions, & resist their loss	DMH1	43
Encourage a range of **dwelling sizes**	DMH2	47
Affordable housing (ref London Plan & CS8) where provided is to be 60% for social & affordable rent, 40% for intermediate rent/sale	DMH3	49
Accept **demolition of an existing sound house** to create a new dwelling but only if designed to code 5, to limit CO_2 emissions etc	DMH4	50
Accept **student housing/bedsits** subject to no loss of permanent housing, catering for local need, & other criteria	DMH5	52
COMMUNITY		
Accept new **community facilities** subject to criteria, & protect/require justification for the loss of existing facilities	DMC1	56
Accept **new schools** for 5+ where there is a shortfall, resist loss of existing school places, require new places to be provided by large developments, & other criteria	DMC2	58
EMPLOYMENT		
Protect (subject to E2 & E3) existing **employment** land/floorspace, & generally accept small business use, but limit larger businesses to locations in centres	DME1	61
Resist loss of **office use** in town centres, & accept loss of upper floor offices only subject to criteria	DME2	65
Resist loss of scattered **employment use** in the wider area subject to criteria	DME3	67
Require major developments to utilise & **support local firms** & residents	DME4	71
NATURE		
Protect **MOL & designated open space** from inappropriate development	DMO1	74
Protect **trees, hedges**, landscape features, biodiversity, nature conservation interest, & require replacement for loss	DMO2	77
DESIGN		
Ensure high quality **design** of buildings & places	DMD1	80
Ensure that developments relate to their **setting**, are safe, have amenity		

space, appropriate architectural language, ensure **sunlight, daylight & privacy** to neighbouring **buildings & gardens**, conserve gardens & trees, be accessible, minimise traffic impact & construction activity	DMD2a	84
Ensure that **Basements** conform to criteria eg structurally sound, not harm heritage assets, not be under listed buildings, take less than 50% of gardens, include SUDS, protect trees, assess impacts on drainage & flooding & structural stability (see also DMF1)	DMD2b	84
Ensure that **extensions** respect the design & form of the original building, respect space between buildings, limit dormers	DMD3	90
Conserve **heritage assets** eg listed or locally listed, conservation area, significant places/parks/buildings/remains/streetscape	DMD4	92
Ensure that **advertisements** do not harm area character, noting cumulative impacts	DMD5	96
Ensure that **telecommunications** apparatus does not have a negative impact on environment or public safety	DMD6	98
Relate **shopfronts** to the character of the host building, retain good shopfronts & building detailing, resist solid shutters, retain or restore upper floor access, make shop ‘level’ entry accessible to all	DMD7a	99
Relate **shop fascia signage** to the shop scale/character & local parade, limit light pollution or visual intrusion	DMD7b	99

ENVIRONMENT

Achieve national CO_2 targets by identifying areas for decentralised **energy networks** (eg Wimbledon TC, Sth Wim, Morden, Colliers Wd, Mitcham)	DMEP1	101
Ensure that **noise** does not affect occupiers or local amenity, through siting or mitigation (areas shown include some railways, part of A3)	DMEP2	104
Allow developments to **offset carbon savings** by supporting sustainable development elsewhere (“allowable solutions”)	DMEP3	107
Ensure minimising of **pollutants** (air, land, water, light, noise) by the construction process & in use, to natural environment/people	DMEP4	109

FLOODING

Allow development in **flood zones** (high/medium/low risk) subject to criteria	DMF1a	112
Allow development in the functional **floodplain** subject to zone 3b criteria	DMF1a	113/4
Ensure all development considers sustainable **drainage systems** (SUDS)	DMF2	118

TRANSPORT

Improve **public transport** via CIL	DMT1a	122
Ensure new development provides **cycle parking**	DMT1b	122
Ensure new development improves **walking /cycling routes**, including creating new routes through barriers or streetblocks	DMT1c	122
Ensure new development does not adversely affect road or public transport networks or **safety or congestion**	DMT2a	124
Require development proposals to show **impacts on transport** network	DMT2bc	124
Provision of **car parking** to be set by public transport accessibility, & in accord with London Plan criteria	DMT3a	127
Allow **zero parking** & residential permit embargo, subject to no adverse effects on street parking, safety, amenity, location	DMT3b	127
Require bays for **disabled & electric** vehicles, car clubs, coaches etc	DMT3d	127
Require **retail/leisure** bays to be short stay, charging related to locality	DMT3e	127
Allow conversion of **surplus parking** to other uses, if public transport is good	DMT3f	127
Require developments to provide for **loading/servicing**, unless Listed etc	DMT3g	127
Protect **transport infrastructure** land, unless no longer needed etc	DMT4a	131
Require land to be provided for **new transport facilities** as needed	DMT4b	131
Require **transport proposals** to be safe, respect street character & environment, provide quality public places, constructed to good standards	DMT5a/e	134
Require uses generating many **goods vehicles** to be beside major roads	DMT5d	134

ENDS

GENERALLY

The Wimbledon Society welcomes this opportunity to contribute to the formation of Merton's Local Plan 2020. Asking for public input at the start of the plan-making process, as now, is admirable, and should be followed by the setting up of a working system to facilitate the making of the Plan.

This contribution is in three parts:
- General comments on the existing Local Development Framework
- Comment on some of the key points and questions in the new Local Plan document, circulated by the Council in November, and
- Comment on existing Local Plan Policies.

1: GENERAL COMMENTS ON THE EXISTING LDF

The opening sections – Consultation and Sustainability, Strategic Objectives and Sub-Areas are useful, and appear of reasonable length.
However, the individual Policy sections need to be much shorter if the new single volume Plan is to be kept within a reasonable size.
In addition to the current "Re-active" Policies, there should be clear performance targets, and "Pro-active" Proposals.

The problem of excessive size applies also to the main text of the Sites and Policies Plan. At present the Policies seem to be designed for the convenience of developers' lawyers. Many current Policies are written with too many caveats, allowing developers to argue for non-compliance.
The Council is then seen as saying one thing in the Plan, and then doing another, which is unhelpful.

Policies need to be clearer, shorter and more direct, with less 'wriggle room'.
As an extreme example, the Society has simplified and condensed all the present Plan Policies onto just two sides of A4. So should there be a kind of 'Executive Summary'?

Each town centre should have its own 'Action Area Plan' giving far more detail, so that the public can visualise what kind of centre they can expect from the plan: see for example the Society's planning and design Strategy for Wimbledon Town Centre.

A high proportion of current applications utterly fail to respect the neighbouring lands, primarily their daylighting and privacy.
Establishing clear neighbour protection standards should be a cornerstone of the Plan.

The Community Infrastructure Levy (CIL) needs to be explained (note map of the 5 zones): similarly the remnants of Section 106.

As a companion document, the Council should consider producing a "Book of Survey" giving statistical information about the Borough of today, plus changes over past years, and possibly future trends, and with maps/tables as required.
It would also help to strip out material from the Plan document itself, making it shorter. It would be a valuable reference work with no policy content.

2: KEY POINTS IN THE LOCAL PLAN DOCUMENT: A RESPONSE TO THE COUNCIL QUESTIONNAIRE

As always with such questionnaires, responses may veer towards the abrupt, and probably do not do justice to some of the complex points raised. Some of the questions, being 'personal' to the responder, are not tailored for a group response.

AFFORDABLE HOUSING

AH1: **yes**: presumably this **London Plan Policy** will only apply if the scheme is one which has to be referred to the Mayor/GLA ie is quite large.

AH2: B = habitable room totals should be used: Currently, developers are nearly always delivering the smallest sized dwellings as affordable, presumably because these are cheaper to build: surprise, surprise.

AH3: Yes: of course these so-called **viability assessments** should be fully public from day one (as in some other London Boroughs already):
Remembering that, as Disraeli might well have said, "there are lies, damned lies and viability assessments".
Viability assessments should in the Society's view have no place in the planning system, - they are important but should remain inside the offices of developers - but we have to live with them for the moment, until HMG sees sense.
Not only viability assessments should be available from day one, all **pre-application discussions** with applicants should be public from day one also.
This allows the public to participate in the creation of a scheme, not just be presented with a fait accompli and given 3 weeks to object. As someone said: Whose town is it anyway?
The public in its various forms knows its locality better than anyone.

AH4: Yes: All developments (perhaps apart from single dwellings) should provide either some **affordable housing** on site, or provide a suitable sum for the Council to build social housing elsewhere in the Borough.

AH5: Yes: policy should remain, so that **genuine student housing** does not have to provide social housing additionally.

ECONOMY & TOWN CENTRES

EC1: Question is rather simplistic: Council can control:
(a) the "**Use Class**" (up to a point, and dependent on HMG policy), and
(b) the **Zones** within which certain policies can apply, and
(c) the **Concentration** or how many establishments of that use should be allowed in a particular frontage.
One might explain this in a table, with the various use classes listed down the side of the page, and the locations/zones across the top. The Society has put this into a table.
One could envisage a zone where only A1 use (shops, post offices, sandwich bars, showrooms) would be permitted - the heart of the town perhaps.

And another zone where the frontage width was limited to x metres, so that one could encourage smaller units (as in Wimbledon Village), and maximise interest for passing public.

And another zone where the concentration policy would apply, to prevent too many bars (A4), or estate agents or betting offices (A2) or takeaways (A5) or money lenders.
And prevent offices (B1) except for their entrances.

The aim would be to ensure that there was enough of each use to provide what the public wants/needs, yet prevents too much of a particular use, which could make the centre dreary or unsavoury.

Unless a town centre actively encourages pedestrians to come and to stay, and use its many pleasurable facilities and essential services, it cannot hope to thrive in the modern world.

EC2: Pubs future: don't know.

EC3: What are the other ways to **encourage Arts** etc asks the Council?
Clearly Designate the Council-owned **P3** site as one which should be primarily used for culture, performance, concerts, public leisure uses etc and then commit to **leasing** it for such a use. Not to delude the public with token additions of "culture" in the list of potential future uses, and naively sell the site off freehold to some developer, and lose all future control of how the site will function, and be a proper public amenity supporting the town's 'offer'.

Similarly, the **P4** site next to the Theatre (the Council owning both of these freeholds) should be **leased**, not sold, and a cultural/leisure use required via a competitive bid process.
In both cases, as the Council would be the freeholder, if the leaseholder failed to deliver the required arts uses, the lease would be forfeit, and the building could revert to the Council.

Introduce a **Heritage Grants scheme** to encourage repairs to listed and locally listed houses, and those in conservation areas etc.
If funding came directly from HMG to participating Councils, such a scheme would have no net cost to the Exchequer, which would gain from normal taxation and VAT payments from local building firms undertaking such works.

Reintroduce the Merton **Design Awards** every 2 years.

Give the Council's so-called **Heritage Forum** a more worthwhile level of practical responsibility, and a budget to work with: it is currently little more than a talking shop (sorry).

EC4: Encourage "**social" workspace** provision, in the same way that social housing is provided. …. **Yes.**

EC5: Yes. How to provide this cheap workspace asks Council ……
Should not the Council acquire or lease currently vacant units, bring them up to standard, and then short term lease them out to start-up firms?
Perhaps the Council could consider funding an outside charitable body to handle this, or set up some kind of quasi-independent stand-alone body.
Will there be some blighted properties resulting from the Crossrail 2 construction phase?
The vacant industrial sites in Burlington Road which have been there for years?
The Council-owned Hall in Kingston Road, only partly used?

EC6: The Council has no powers to "require": but they could "encourage".
So **Don't Know.**

EC7: Yes. Same principle as Social Housing, but we are not clear that the Council has any such planning powers for workspace.

HOUSING GROWTH & INFRASTRUCTURE

HG1: The Council asks; How to provide for the proposed 1,328 new dwellings each year in the future Merton?
* But this London Plan figure has not yet been agreed: there has been no public examination: and we do not yet know what the delivery of this future number will mean for our locality, our transport and education, our character and natural/historical environment:
* Some will say that the achievement of numbers should be secondary to the respect for local character and environment, and quality of life:
* So before agreeing to any actual future figures we need to see the worked-out example, showing the extent of the land take for additional schools, transport, workplaces, transport systems, and other infrastructure:
And the change in our local environmental quality and character and nature:

And we need to know the cost of all this, including the cost of demolishing perfectly good buildings so that their sites can be used more intensively.

And we need to compare this intensification of housing inside London's boundaries with alternative planning concepts like extending London by building on sections of the Green Belt, or New Towns, or a mixture of all three.
And land value capture should be a significant part of the equation, certainly in the last two.

This is proper planning, not numbers produced by the shouters of slogans.
Without this being worked out first, we are just being amateurish, not knowing the implications of what we are being asked to agree to: signing a blank cheque is not sensible.

And the bizarre concentration on just numbers fails to deal with the inability of the market to provide enough housing that is "cheap" enough to be afforded by those on lower incomes. This is largely because the state funding (of Housing Associations etc) does not allow the purchase or construction of enough new housing.
Developers do not build unless they can sell the product: if the price that can be afforded is not up to the cost of manufacture, then the product does not get made.
Which is why the state has traditionally had to step in and use public funds.

So responding to the examples quoted:
* Housing on superstores: **Yes**
* Housing in **high buildings: No**, not in Wimbledon, which should have no high buildings
* **Industrial** Estates as mixed uses**: No**, disastrous for the residents' quality of life
* Make new housing **smaller** to fit more in: **No**
* Communal living: **Don't know**
* Intensifying around transport hubs: **Yes**, but subject always to local character and environment being predominant
* Suburban infill mews: **Don't know**
* Garages demolished and infilled: **Don't know**
* No development less than 2-3 storeys: **Don't know**: local character might require low height (eg a Westside house being one storey above ground and one basement, so that a view is kept?)
* Neighbourhood Plans supported: **Don't know**
* Recycle existing housing ie demolish good housing in order to build more intensively…. This happens already via the ordinary market forces, but is it a good idea to promote it? **Don't know**
* Regenerate more Estates: even if they are working well? **Don't know**

HG2:
* All small non-housing sites to be used for housing: = loss of local facilities and workplaces: **No**
* Automatic planning permissions for standard house designs = could fail to respect and protect the amenities of neighbouring properties: speed of taking planning decisions is less important than getting it right: **No**
* Houses near town centres allowed to be converted to flats: **Yes subject to** other controls on amenity, neighbour protection, heritage issues

HG3: The three (from 15! all of which we need to function as a place: so seems to be an utterly fatuous question) most important elements of infrastructure are perhaps …..
* **Green** Infrastructure and **Open Spaces**
* **School places** and education
* **Utilities**.

HG4: There is no mention in the list of **public service and civic offices**, without which no town centre is complete: these are facilities that draw people together, that act as focus for community governance and identity.

HG5: Should Health Impact Assessments be required for all applications, not just for those above 10 dwellings: **Don't know**: It could be argued that this information should not have to be provided by applicants anyway, as a simple addition of dwelling numbers would give enough info for Health Authorities.

HG6: Are childrens' play facilities adequate locally? **Probably not.**

<u>**TRAVEL & MOVEMENT**</u>

TM1: (Personal questions on walking)

TM2: What discourages walking? Proximity to dangerous **speeding** traffic: fumes

TM3: (Personal questions on cycling)

TM4: What discourages cycling? High **vulnerability to passing traffic** on unsegregated roads: lack of adequate safe/secure cycle parking in town centre and village.
The present cycle facilities across the Borough are clearly well below the standard to which we should aspire.

TM5: Importance of the following to cycling use:
* segregated cycle lanes: **very important**
* less pollution: **very important**
* cycle hire: **not at all** important
* cycle parking: **important**
* less clutter: **not at all** important
* safe routes: **very important**
* better cycle signs: **not at all** important: most signs are just clutter, and of no use and should be removed
* street lighting: **moderately important**
* resting space: **not at all** important
* Other: **behaviour of cyclists** towards others (including pedestrians) needs improvement, and **visibility** aids etc need to be encouraged

TM6: (Personal questions)

TM7: (Personal questions)

TM9: (Personal questions)

TM10: Car parking should prioritise short stay, disabled, servicing: **Yes.**
All centres throughout the Borough should have free parking for (say) at least 30 minutes, particularly to support local small scale parades.
Currently the 20 minute free areas are inadequate, patchy and illogical.

TM11: Should residents in new developments close to good public transport be prevented from having residents parking permits to park on street? **Don't know.**

TM12: Should the Council reduce traffic levels, and protect local streets from short cuts? **Yes.** But controlling traffic behaviour (speed etc) also has its place.

TM13: Reducing pollution and congestion by:
* car clubs: **don't know**
* more cycle parking: **yes**

* electric vehicle charging points: **yes**
* dedicated bus lanes: **yes**
* Taxi spaces: **don't know**
* Delivery moped spaces: **don't know**

WIMBLEDON

Rather than address these Council-generated questions, the Council should instead look at the "Wishlists" drawn up by the various local groups, and formulate their approach accordingly. Working collaboratively for example can mean different things to the Council and to Local People.

Creating the plan for the town centre with reactive "policies" alone is clearly not working.
Instead, we have to see a proactive approach, one which demonstrates to the public the likely outcome, the practical and physical goals that we want to achieve.
Only then can there be understanding of the implication of particular polices.

And the public will feel part of the plan-making process and part (assuming their involvement at the pre-application stage – see above) of the creative design on each individual site.

The Council will have seen the Society's favoured approach to a design and planning strategy for the Town Centre, (derived from local wishlists) and it is suggested that this is used as the starting point.

The same comments apply to the centres of Raynes Park, Wimbledon Village, South Wimbledon, Arthur Road and Colliers Wood, as to Wimbledon Town Centre.

……….

3: EXISTING LOCAL PLAN POLICIES

The comments below are in part derived from the Society's experience of considering applications against the approved Plan Policies, and aim to highlight where the 'gaps' seem to be.

CENTRES, SHOPPING ETC

DMR1a3	Add this restriction on large units so as to apply to parts of Wimbledon Town Centre (eg W/Hill Road, Town Hall/Queen's Road/Broadway conservation area zone, eastern end of Broadway, future development in Victoria Crescent), & perhaps other centres.
DMR2	Strengthen limits on out of town uses (eg Next beside A3). Larger scale maps needed to show town centre zones (ie not just table 1.1 & Fig 1.1).
DMR4 & 5	Revise the approach to the protection of shop frontages uses: currently the many Neighbourhood Parades are not sufficiently protected (see enclosed table).
DMR6	Culture – specific proposals for sites, needed eg P3 & P4 (see page 3 above).
DMR7	Market location criteria – try an alternative tabular approach as in DMR4 above.
DMR8	Add Policy that major new development above the tracks will be promoted as an integral part of the CR2 project, and linked to the Centre Court pedestrian mall.

The Council should resist any tunnelling operation from the Wimbledon end, given the high level of disruption that would be caused both to the town centre and to the rail services.
Instead, the Council should actively press for the tunnelling to be undertaken from the Thames end, with direct waste transfer via barges.

HOUSING

DMH2	Add protection from housing loss, unless the existing environment is not suitable. Add protection of existing housing.

Policy needed on amalgamating flats into single occupancy, leading to housing loss.
Housing mix Policy should be more broad brush = 1/3rd rather than percentages.

DMH3 Affordable housing needs to be redrafted: aim could also be to get more people onto the housing ladder, and a step towards partial or full ownership, not only to provide for social renting: clarify that all new housing (apart from single houses and student/care housing?) needs to contribute to the social housing build fund.

DMH4 Demolition of a single house – retain higher than usual sustainability standards for retention, including when replacement is 2 or more houses ie not just the one.
The Sustainability score system needs updating.

DMH6 Need new Policy to prevent the loss of local care homes, where their sites are being sold off for more lucrative market housing, leading to local elderly having to uproot.

INFRASTRUCTURE & COMMUNITY & EDUCATION

DMC1 Need to protect the loss of local Community Facilities: B1 add "in the near locality" as facilities in (expensive and easy to sell off) Wimbledon sites are being moved to (cheaper) Mitcham and Morden for cost reasons, with local people losing access.

DMC2 Existing education/school/sites (eg The Drive) are being sold off for housing yet there is a major need for more education land: need for a Policy to prevent/protect.

DMC3 Need for new Policy to maintain and expand the existing public service buildings in town centres. This is where they should be, but over the years many of these civic facilities have gone, as their sites are more valuable to their owners when sold off.

Towns without their community/education/public buildings (Court, Civic and Town Hall, Community Centre, Churches, Police Station) & a rich mix of uses lack resilience.

EMPLOYMENT

DME1 Protect significant employment buildings/zones from changing use (to housing), to maintain local services and local employment opportunities.
No town can function properly without support from essential local services.
Incursions of housing & other uses unsuited to employment zones need to be resisted.
Increasing the number of long commuting journeys to work (often stressful on the main transport systems into the centre of London) seems counterproductive.
Include the PTAL map in the documents: Consider a similar table to the shops policy.

DME? Local employment/part time working etc means that much work is done at home.
High grade accessibility to electronic networks etc is therefore needed throughout the Borough, not just for town centres: how to facilitate and encourage this service?
How to ensure that all new development incorporates, perhaps even funds, this infrastructure?

DME2 Change the Core Strategy proposal that currently says that High Buildings are acceptable in Wimbledon Town Centre. These are clearly not desirable in the view of the local community, as expressed in their various 'wishlists'.

DME ? Add Policy requiring new office development to be so designed as to be adaptable to other uses (eg housing, leisure) in the future if required.
This means defining minimum headroom limits, floor loadings etc.

An adapted building is often less disruptive to the locality during construction, and far more sustainable than a total demolition and rebuild.

NATURAL ENVIRONMENT

DMO1 Omit B(i) which sanctions building on open spaces.
Change B(iii) to make clear that only development which specifically helps that open space to function should be accepted, ie there should be no acceptance of say Squash Courts which should have no place in open spaces. Open land should mean just that.

Open spaces should not be seen as cheap sites for “leisure” buildings.

Para 5.15 needs to include activities such as horse riding (eg on Wimbledon Common), and support for the retention of stabling etc that invariably is sited away from the open space itself. Specific protection for allotments also needs to be included.

DMO? There needs to be a commitment to improving ecological variety (some open spaces are almost ecological deserts), of leisure use, of local management with safeguards. The Council should commit to a Policy of acquiring threatened open lands, and to protective designation of current green spaces that could be under threat. Additionally, some architectural/historical views/features/elements have been lost (eg Wimbledon Park), and there should be an aim to re-introduce some of these.

DMO? The enormous amount of green land in back gardens, providing green outlook and a wide ecological range and nature corridors, needs to be more formally protected. Large outbuildings, swimming pools, etc can introduce urban elements into what ideally should be green backland space.

DMO? Add a cross reference to the (excellent) current Policy on protecting daylighting and overlooking etc to neighbouring land and rear gardens, not just rear windows. Something that many applicants are currently totally failing to understand.

DMO? Another cross reference to green-ness in front gardens (covered later) would help.

DMO2 A Policy should require the “Tree Years” replacement approach, where the total age of the lost trees is matched by the ages of the new tree planting.
This can either be on site or (as would often be the case) gifted to the Council to plant elsewhere in the neighbourhood. (The Society can provide worked examples showing the quite small scale financial implications for applicants). This would partly address the “plant a sapling to compensate for the loss of a century-old oak” criticism.

DMO? A Policy is needed to require that a proportion of open green land (usually at the rear) is provided on a development site. (For a poor recent example, see Kingston Road housing opposite Wimbledon Chase station).

DMO? Front garden greenery is being lost as paving, car parking, double access driveways are built. The RHS has been campaigning on this issue for some time, and urbanisation and loss of nature is a concern. In addition to Policy constraints, the Council should be actively considering introducing Article 4 Directions to control this, given the PD rights availability to householders. Simple one-page practical guidance is also needed.

DMO2 Add SINC’s to para 5.25.

DMO? Add Policy that the Council will acquire/adopt open lands that are suitable for open space use, or that provide ecological or visual amenity benefits, or that require protection from development.

DMO? Add Policy that the Council will severely limit the use of defined open spaces by closed-access concerts etc, so as to maintain public accessibility and quiet enjoyment.

DMO? Add Policy that Council will aid and support local groups that are judged able to take over the running of an open space, in whole or in part, with safeguards.

DMO? There should be Council initiative to implement an environmental improvement along each of the Borough’s rivers and watercourses. The Planning Office produced a scheme for implementing just such an enhancement scheme along the Beverley Brook (Phil Ryder) some years ago, which should be brought forward.
The Wandle, the Raynes Park/New Malden cycle route are other obvious candidates.

URBAN DESIGN

DMD1D Add in maintenance of Street Gaps, where these are significant in local road character.

DMD1E Add that the Council will formally adopt these new pedestrian/cycle routes and also existing un-adopted footpaths to facilitate their use by the public (eg the footpath between Lindisfarne Road and Cottenham Park Road).

DMD1F	Add Policy that protects existing good paving and kerbing, and reintroduces eg Granite Setts, York Stone paving in selected areas, improving the setting of listed buildings etc.
DMD1?	Add Policy that street lighting luminaires will be located on building facades, to lessen street clutter. Currently the legal powers to require this appear to be limited to the City of London: new powers should be sought together with other Boroughs/GLA. Agreements with individual developments could facilitate local schemes.
DMD1?	Add Policy that when streetlight renewals are required, the height of the posts will need to respect the local scale and character: see for example the inappropriate high masts in Wimbledon Village and across the Common, quite alien to local character. And that light pollution will be avoided (eg by having a flat under-face design).
DMD1J	Revise Policy on front garden parking: the current Policy whilst welcome is not having the desired effect. It is likely that this will continue until the Council designates more Article 4 Directions to control the Householder PD rights.
DMD1?	Front garden walls and fencing need to have a more robust Policy guidance. Whilst there are some fine 'historic' walls locally, the closing off of views and the loss of roadside greenery and "eyes on the street" is creating an urbanised street scene.
Para 6.11:	Design Guidance handouts on design are welcome, but the planning system is evolving, and the Society's view is that such guides now need to be very short, one or maximum two pages of diagrams only, not text based, easy to read and to copy. Long booklets on how to create shopfronts etc is an outdated approach: no-one has time to read it, and the basic design message can be got across more simply. The list of reference works need culling: most are worthy and wordy but ineffectual.
Para 6.12:	Design & Access Statements have mostly not followed the concept set out by HMG. They seem to be largely salesmanship statements. Requiring them to be produced adds to the developer's workload, but adds little of real value.
DMD2A(i)	Add in the importance of Building Lines, which define the scale and nature of so many streets: and street gaps between buildings, where these are a part of the urban character, allowing views through to the rear greenery, avoiding the terraced effect.
DMD2A(v)	Exceptionally important Policy that needs to emphasise more that neighbour protection (privacy from overlooking, and daylighting to nearby rear private garden spaces particularly) has to be a fundamental requirement. Add "lands and sites" to gardens.
DMD2A(ix)	Reference to the Tree Years replacement approach (see above DMO2). Protection during the "construction activity" as well as from the effects of the new building.
DMD2A?	Add Policy that actively discourages the retention of just facades of good buildings. Their internal character is often an integral part of their value, and such buildings should be more than a stage set frontage with an incongruous addition at the rear.
DMD2A?	Add Policy to encourage the adaptability of new buildings, particularly in ceiling heights and floor loadings, to encourage re-use and adaptation of existing buildings, rather than total demolition and rebuild, being less disruptive and more sustainable.
DMD2A?	Add Policy on density, a control on the intensity and mass of the building as compared to that prevailing in the wider area.
DMD2B(i)	Basement Policy has been welcome and valuable. But real doubts remain over whether basements should be allowed under semi-detached or terraced properties. Anecdotal evidence is suggesting that there may be longterm effects on adjoining properties, with their different, and perhaps more flexible, foundation systems.
DMD2?	High buildings Policy needed. In Wimbledon Town Centre, no building should exceed c6 storeys (c23m) and 3/4 storeys in the conservation areas and at the eastern end, all being subject to daylight/privacy constraints to protect nearby housing.
DMD2B(i)	Add "and adjoining/nearby buildings and lands": it is also highly important to protect the gardens of neighbours. Add an embargo on more than a single basement.

DMD2B(iii)A	Add an embargo on Locally Listed Buildings also, being a defined Heritage Asset.
Para 6.14:	Add "that respects both the local character and the neighbourliness standards of daylighting and overlooking in relation to nearby gardens and properties".
Para 6.16A	Add Policy that covers Flats: single aspect flats lack cross ventilation and should be discouraged; internal circulation corridors should similarly be discouraged as they need 24 hour artificial lighting and ventilation.
Para 6.20	Link the welcome reference to back gardens to the Natural Environment chapter.
Para 6.24	See note on D&A Statements above in 6.12.
Para 6.28	A Hydrology report should be required for all basement proposals, not just "where appropriate", which is ignored by developers.
Para 6.37	See comment on reference documents at 6.11.
DMD3A(iii)	Need to specifically mention maintaining street gaps (see DMD2A(i) above).
DMD3A?	Add neighbourliness standards as in DMD2A(v) above.
DMD4B	Add "the Borough's heritage assets ***or local character*** or their setting …".
DMD4(c)	Need to remove/rephrase, as this Policy (for example) could have been used by those who in 1983 wished to see the demolition of the listed Town Hall in Wimbledon.
DMD4(d)	Add "The loss of a building ***or use*** that makes a positive contribution …"
DMD4(g)	Add new Policy on Archaeology: all proposals for development in the Historic England defined Archaeological Priority Areas (Tiers 1, 2 & 3) should require a desk top study. Where significant material is evident, Planning Conditions will be applied that require investigation by an Independent archaeological team prior to site works commencing. A whole Borough map should be incorporated showing the 4 Archaeological Tiers zones. Para 6.52 needs adapting: See the Historic England report of 4/2016.
Para 6.49	Locally Listed Buildings should be clearly classed as Designated Heritage Assets. Given that they are the subject of Policy, they should also be listed in the Appendix, just as Listed Buildings are.
DMD5	Add to the policy aims: avoidance of clutter, the proliferation problem of many signs, carefully relating the sign design and size to the building design, effect on residential property opposite the signage eg glare, and danger to passing traffic.
DMD5	Add that on Listed and Locally Listed buildings and in Conservation Areas, signs should not be internally illuminated. A one page design guide could illustrate the range of building/area "sensitivity" on one axis, and the signage considered appropriate on the other: eg unlit painted signs only (listed etc), then externally lit by lamps, then hidden or halo lit, then internally illuminated letters, then internally illuminated fascias. Flashing signage would presumably always be precluded.
DMD7	Shop front design and signage – see comments above on 6.11.
DMD	Add in the Core Strategy map 22.2 showing the Distinctive Areas of the Borough, together with appropriate Policies for each zone. And a larger text for the Key.

ENERGY NETWORKS, POLLUTION & ENVIRONMENTAL PROTECTION

DMEP1	Decentralised Energy Networks: add Policy that requires a new development in the network zones to demonstrate how it could eventually fully integrate with the town's future energy network, both for supply and for generation/contribution.
DMEP2	Add Policy that favours/encourages autonomous (electric) vehicles and other quiet source types: quiet and non-polluting public service vehicles being phased in.
DMEP2?	Add Policy Proposal that installs noise barriers along (eg) the A3, which currently pollutes significant residential and open space areas in West Wimbledon/Kingston. Figure 7.2 needs to be redrawn to illustrate many more noise-polluting sources.
DMEP3	The Society lacks information on whether these so-called 'allowable solutions' are in the public interest, or whether they allow unsatisfactory development to proceed. Whether the Working Group has been set up, and how it is working, is not known.

DMEP4	Add Policy Proposal for Wimbledon Town Centre that the main traffic route through the town will over time be diverted away from The Broadway, where there is a high concentration of pedestrians vulnerable to traffic danger and fume pollution.
	It seems clear that the information on current pollution levels across the Borough remains patchy, and full information on this should be independently published.
DMEP4?	In the Plan there should be specific targets for pollution reduction over time.

FLOODING

DMF1	Add Policy that no new vulnerable development (eg housing) should be built in Flood Zones 3a and 3b. And that new housing etc in zones 1 and 2 should have robust and resilient mitigation measures built in. And that retrospective robust protection for existing housing in flood zones would be undertaken as part of a phased programme within a specified period. The accompanying table and para 8.6 therefore need to be re-written.

TRANSPORT

DMT3(i)	Add Policy that Council will introduce 30 minute free parking in or beside all centres in the Borough, to aid their viability and footfall.
Map	The updated PTAL map for the Borough should be included, plus a Key.
DMT4(c)	Add Policy that to improve Wimbledon Town Centre, pedestrianisation of parts of The Broadway will be progressively implemented.
DMT4(d)	Two new bridges should be built over the rail tracks in conjunction with the CR2 build programme. (Details to be shown in the Action Area Plan). The existing bridge at the station is also to be rebuilt, as is the station itself. The future CR2 station at Wimbledon should incorporate a comprehensive transport interchange between Rail/CR2, Tube, Tram, Bus, Taxi and Cycles. Raynes Park Station should be rebuilt as part of the CR2 project, possibly on a site to the north-east of the present station, with integrated bus/taxi/cycle facilities. (Additional works eg to level crossings, and Lower Downs Road etc yet to be finalised).
DMT4(d)	Add Policy that land will be safeguarded to facilitate the construction of the Cross Rail 2 project, and the rebuilding of the two Stations.
DMT5(f)	Add Policy that discourages twin access points for individual small (eg housing) development sites, which both limit kerbside space (for parking and servicing), and reduce the amount of garden space for greenery.

APPENDICES: TRANSPORT PROPOSALS

A.1.1	Add in Rail/CR2, Tube, Tram, bus, taxi, cycle interchange hub at Wimbledon Station.
A.1.2	Add in various proposals for Crossrail 2 works (see above).
A.1.4	Add in the pedestrianisation of parts of Wimbledon Town Centre, rebuilt bridge and two new bridges, and other road works. Consider whether the inadequate intersection at Hartfield Road and Kingston Road, with its tram tracks and station, should be reconfigured.
A.1.5	Add in realignment of the intersection at The Broadway and Russell Road to create a pedestrianised square beside the Theatre.
A.1.6	Add provision of secure cycle parking within/close to the Station for some 300 cycles. The current cycle facilities and routes in the wider Wimbledon and Raynes Park area are nowhere near the standards required, and a new initiative is needed.
B.1	Amend Copse Hill to Morley Park, being playing fields, private park and public park.
B.5	M0104 Wimbledon War Memorial is said to be located on Wimbledon Common land. Consider designating two slivers of private green land, in Savona Close and Thackeray Close, West Wimbledon.

E Incorporate the Map of the newly defined 4 Tiers of Archaeological Priority Areas (Historic England 4/16).

G The flood risk classification, which appears to allow housing to be built in vulnerable locations, needs review (see DMF1 notes above).

MAPS

Generally All maps need to be easily accessible and printable via personal electronic devices.

Key: 282/300 Add to Heritage: **Local List buildings** are not shown, so refer to Schedule in Appendix. Add note that **Town Centres** are covered by **Action Area Plans** to a larger scale.

The **P3 site:** The "allocated uses" should now be clearly set out as primarily for community and public hall/concerts: and the Council should commit to disposing only of the Leasehold in order to ensure that the site is used for this primary purpose, and also that the Council will continue to receive income from its landholding in perpetuity as Freeholder. No high building should be acceptable on this site.
There is the option of utilising/incorporating the present small bus station into the main P3 site, after the completion of a transport/bus hub at the CR2 Station complex.

The **P4 site:** The "allocated uses" should be clearly set out as primarily for community/cultural, leisure and entertainment: taking Russell Road through the southern part of the site could allow its present junction with The Broadway to be pedestrianised as part of a Square beside the Theatre.
As with the P3 site, the Council should retain the Freehold, and only dispose of the Leasehold via competitive tender. No high building should be acceptable on this site.

Wimbledon Station complex. As part of the Crossrail 2 site, the present station building is to be replaced. Future uses include a new station concourse, escalator/lift access to all platforms, and incorporating a major rail/bus/taxi/tram/cycle interchange.
Retail dominated space at ground and first floor levels link in to the existing upper floor pedestrian mall in Centre Court. Commercial, public service, social and housing development on the upper floors, with parking for cars and c.300 cycles. Servicing is via a new road bridge across the tracks linking to the existing Centre Court access.
High building precluded, with 6 storeys being the maximum.

The 'Fridge' building opposite the Station seems likely to be demolished as part of the CR2 scheme, together with the existing road bridge. The latter rebuilt to a new alignment as part of the CR2 scheme. Note that the associated offices and car park may possibly remain.

Sites bounded by **The Broadway, Gladstone Road, Russell Road:** developed as a mixed use complex, incorporating a road link between Sir Cyril Black Way and The Broadway, and fronting onto a new Square and greenspace beside the Theatre.

Site bounded by **St Mark's Place**, Wimbledon Hill Road, Alexandra Road: Pub and Frontage to St Mark's Place retained, redevelopment of remainder around a quiet pedestrianised setting for Church, linked across Alexandra Road to the bus station.

St George's Road and **Alexandra Road:** sites on the south-eastern frontages may be subject to demolition/future rebuild, depending on which CR2 scheme is selected.

Other sites: TBA.

…… ends

SHOPPING FACILITIES IN TOWN CENTRES AND LOCALLY

THE PRESENT LBM POLICY APPROACH

Showing where various frontage uses are and are not accepted in the current Plan Policies.

Use Class	Description (examples)	Wimbledon Central	Core frontages	Secondary frontages	Other frontages	Neighbourhood Parades	Local shops
V (See Notes below)		W	W X	W X	W X	W	Y
A1	Shops, Post offices, Showrooms, Travel Agents, Sandwich bars, Cleaners, Hairdressers	yes	yes	yes	yes	yes	yes
A2	Building Societies, Banks, Estate Agents, Betting Offices	no	no	50%	yes	30%	yes
A3	Restaurants, cafes Snack Bars	no	50%	50%	yes	30%	yes
A4	Pubs, bars	no	50%	50%	yes	30%	yes
A5	Hot Food Takeaways	no	no	50%	yes	30%	yes
D1	Libraries, Halls, Clinics, Churches, Day Nursery, Schools, Day Centres	no	50%	50%	yes	30%	yes
D2	Concert Halls, Baths, Cinemas, Sports Halls, Gyms	no	50%	50%	yes	30%	no
B1	Offices, (Light Industry)	no	no	50%	yes	30%	yes
C3	Residential	no	no	50%	yes	30%	z yes
Sui Generis	eg Theatres, Social, Commercial, Betting Offices	no	no	no	yes	30%	no

NOTES In all cases, independent access to upper/lower floors is to be maintained.

V A Use Class is a grouping of similar land uses as defined by HMG. Planning Permission is required to change from one Use Class to another, except where legislation allows certain changes to be made without needing permission. These include A2 to A1 if display window, A3 to A2/A1, A5 to A3/2/1 etc

W The locations/addresses of premises are listed in the Plan's Appendix.

50% & 30% The maximum number of this use permitted within a particular frontage is to be measured across 12 adjoining shop units, ideally 6 on either side of the site.

X Within certain "small shop protection frontages" in Wimbledon Town Centre and Wimbledon Village the maximum permitted floor area is limited to 280sqm, and maximum frontage width limited to 6m. These zones are defined in the Plan, and the addresses of premises are listed in the Plan's Appendix.

Y Change from A1 retail is only permitted if other convenience shops are within 400m, and that there is no loss of residents' amenity, and no parking or traffic impacts, and upper floor access is maintained, and that marketing has been unsuccessful.

Z Residential is only acceptable subject to no loss of residents' amenity, and no parking or traffic impacts, and upper floor access is maintained, and that marketing has been unsuccessful.