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2 March 2018

Greater London Authority
City Hall
18 The Queen's Walk
London
SE1 2AA

Dear Sir / Madam

**GREATER LONDON AUTHORITY – DRAFT LONDON PLAN
REPRESENTATIONS ON BEHALF OF ABERDEEN STANDARD INVESTMENTS
CENTRE COURT SHOPPING CENTRE, WIMBLEDON, LONDON, SW19 8YE**

These representations are submitted on behalf of Aberdeen Standard Investments, owners of Centre Court Shopping Centre, Wimbledon.

The submission of these representations on behalf of Aberdeen Standard Investments forms part of the longer term management and development aspirations for Centre Court and the wider area.

These representations are made in the context of representations made in September 2015 in response to the Crossrail 2 safeguarding route consultation which identified much/all of Centre Court Shopping Centre as being within the safeguarding zone for the potential Crossrail 2 Route. This planning of the potential alignment of Crossrail 2 which will determine whether all or part of the existing Centre Court Shopping Centre would be affected has not been completed. At that time, we made representation suggesting alternative routes which would not require the complete or partial closure of Centre Court Shopping Centre which is the main focus of retail within and contributor to the health of the Town Centre. We also proposed options for a significant joint redevelopment of both the Shopping Centre and the Station.

Given the uncertainties about Crossrail 2 at this stage of preparation of the plan-making process we consider that policy should offer a framework for significant reinforcement of Wimbledon town centre of which Centre Court forms an integral part, with or without Crossrail 2. This would be consistent with other draft London Plan objectives.

Chapter 1 – Spatial Development Patterns

Policy GG2

We strongly support the aspiration of Policy GG2 to create high-density, mixed-use places which prioritise development of Opportunity Areas (OAs) and sites which are well-connected by existing or planned Tube and rail stations and that are within or on the edge of town centres.

We also strongly support part B of the policy which seeks to ensure that those promoting development proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting high density development, particularly on well-connected sites.

Chapter 2 – Spatial Development Patterns

Policy SD1

We support the Mayor's commitment to OAs, in particular Part 4 of the policy which states the Mayor will ensure that his agencies (including TfL) work together and with others to promote and champion OAs, and to identify those that require public investment and intervention to achieve their growth potential.

Crossrail 2 - Paragraph 2.1.19

We strongly support the recognition in the draft Plan of the importance of the delivery of Crossrail 2 to facilitate 200,000 new homes and 200,000 jobs including at least 5,000 new homes and 6,000 new jobs in Wimbledon. However, we note that those opportunities to increase jobs exist without the delivery of Crossrail 2 as well and should be recognised in policy reflecting the existing PTAL of Wimbledon town centre.

Wimbledon OA – Paragraph 2.1.25

We welcome the recognition that Crossrail 2 will create a step change in transport capacity and connectivity which will transform Wimbledon into a major transport hub and we particularly support the aspiration for speculative office development in Wimbledon Town Centre. Notwithstanding this, the draft Plan should recognise that opportunities for office development also exist without the delivery of Crossrail 2.

Policy SD6 Town Centres

We support the recognition in Part C of the Policy of the potential for new housing within and on the edge of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance and their current and future accessibility by public transport.

Despite being a major town centre, Wimbledon Town Centre is currently characterised by lower density development and there is a clear opportunity to increase density whilst still respecting heritage assets.

As a highly accessible town centre, Wimbledon is an appropriate and sustainable location for office as well as housing development. Given the limited number of available sites in Wimbledon, combined with their

constraints, this is likely to require higher density development and re-development in order to deliver appropriately sized floorplates.

Turning to Part E, there has been a loss of office space in suburban town centres such to permitted development rights schemes. This has led to a shortage of modern offices and we consider there is an opportunity to increase office space in locations such as Wimbledon through higher density mixed-use development. This would reinforce Wimbledon's position as an office location.

Wimbledon is already a successful and attractive location for evening attractions but there are opportunities to enhance that provision. Therefore we support the promotion of such activities in Part F.

Policy SD7 Town Centre Network

We welcome the recognition that the changing role of town centres should be proactively managed in relation to the town centre network as a whole.

Under Part D of the Policy Wimbledon falls within the category of major town centres which should be a focus for higher-order comparison goods retailing. Aberdeen Standard Investments supports the identification of such centres for securing opportunities for higher density employment, leisure and residential development in a high quality environment.

However, this should not be prejudiced by other plan policies which could result in the loss of such attractions to the benefit of the town centre as a whole.

Policy SD8 Town Centres: Development Principles and Development Plan Documents

We support the content of Annex 1, as referred to in part (4) of this policy which identifies Wimbledon explicitly in Table A1.1: Town Centre Network as having particular scope to accommodate new commercial development and higher density housing.

Chapter 3 – Design

Policy D6 – Optimising Housing Density

We strongly support part B1 of the Policy which links the density of proposed development on the future planned levels of infrastructure rather than existing levels.

Notwithstanding this, we are concerned regarding Parts D & E of the Policy which seek seven separate measures of density. We do not consider this level of information is required to assess an application in terms of density at a strategic level. We consider Part E of the Policy should be deleted as this information is not required to assess the appropriateness of the density of a development scheme.

Chapter 4- Housing

Policy H6 – Threshold approach to applications

Whilst we support the aim of the Policy to provide a potential fast track route for development, we consider the proposed threshold (35% and 50%) for affordable housing should only be treated as thresholds for the purposes of assessing viability.

S106/CIL payments should only be sought to mitigate direct impacts and should not affect materially the development's viability or the proportion of affordable housing.

If land owned by our client is made available for the provision of rail infrastructure, then the policy should reflect that it would be appropriate for CIL liabilities to be removed or obviated.

We suggest that the policy be amended to take account of the often significant infrastructure challenges and unique circumstances often face in Opportunity Areas and to set out how such requirements will be prioritised in respect of affordable housing requirements.

In addition, we are concerned regarding the lack of clarity of the definition of 'public land' in the context of Policy H6 and the application of the 50% affordable housing requirement. The policy is silent in terms of what approach the GLA will apply in instances where public land is developed in partnership with private land. Private developers should not be penalised or discouraged from entering into joint ventures with public sector land owners by the application of the 50% requirement across entire sites where there are both public and private land interests. We consider this approach will encourage piecemeal redevelopment and discourage a comprehensive and joint up approach to redevelopment.

Policy H13 – Build to Rent

We support the thrust of this policy which provides a fast track viability assessment route for Build to Rent properties, bringing the tenure in line with for sale housing. Notwithstanding this, the comments set out above in relation to Policy H6 also apply to Policy H13.

Chapter 10 – Transport

Policy T3 – Transport capacity, connectivity and safeguarding

We strongly support the identification of securing Crossrail 2 as a priority in development plans and development decisions.

Table 10.2 Minimum Cycle Parking Standards

We are concerned regarding the proposed further increase in cycle parking requirements for one bed homes. We question whether there is sufficient demand for the proposed quantum of cycle parking proposed. We are aware that a large number of residential cycle stores across London are significantly underused. The current cycle parking requirements are difficult to accommodate into developments, often resulting in reduced active frontage

at ground floor, which conflicts with the Mayor's design policies. In addition, they reduce the amount of space within developments which can be used to provide homes, including affordable units, which directly conflicts with the Mayor's agenda to maximise the number of units delivered across London. The proposed increase in cycle parking for one bed units from 1 space per unit to 1.5 spaces per unit will further exacerbate the current design and land use issues despite no evidence that there is demand for additional cycle parking spaces.

Table A1.1 Town Centre Network

We welcome the recognition of Wimbledon as:

- a) An area with high potential for commercial growth (reflecting the opportunities for offices);
- b) An area with high potential for residential growth (reflecting the opportunities for higher density development); and
- c) An 'A' location in Figure A1.4: 'Town Centre Office Guidelines' as which has the capacity, demand and viability to accommodate new speculative office development.

Closing

If you require any further information please do not hesitate to contact Julian Stephenson at this office.

**Montagu Evans LLP**