Planning Policy
Future Merton
London Borough of Merton
12th Floor Civic Centre
London Road
Morden
SM4 5DX

22nd March 2012

Dear Sirs,

Representation on London Borough of Merton’s Sites and Policies Development Plan Document

On behalf of CBRE Global Investors acting on behalf of the Landowner, please find below our response to the above consultation document, the deadline for which we note is 23rd of March 2012.

The DPD which is subject to this consultation contains detailed planning policies which will help assess planning applications in Merton. The DPD also allocates sites for redevelopment between 2013 and 2023 – this includes our client’s site ‘Dreams 117-125 London Road, Mitcham, CR4 2JA’ (please see location plan attached to Appendix 1 of this letter).

In addition, a new Proposals Map which accompanies the ‘Sites and Policies DPD’ also seeks to update the town centre boundaries – this includes Mitcham District Centre in which our client’s site is currently located.

In respect of our client’s site (117-125 London Road) it is important to note that it is an established retail destination. Indeed the planning history of the site dates back to 1994, where a change of use was granted from a home improvement centre to a retail warehouse (Application Reference: 94/P0500). As a result, the use of the site for retail purposes has been established for over ten years.

Historically the site has been allocated for residential development (this includes land to the south of the site) however, this allocation has not been taken forward within the ‘Sites and Policies DPD’ which is subject to this consultation.
We consider that the use of the site should be promoted for retail development. Indeed, the Council’s 2011 retail study promotes the site for future retail development with capacity to deliver 1,500sqm gross floorspace at ground floor level – this includes land to the south of the site (car park adjacent to 125 London Road). Although the overall development prospects were low – this was due to the uncertainty surrounding the acquisition of the dreams unit. We can confirm that our client is keen to pursue the site for future retail development – its principle use.

In light of the above, we also consider that the Council should promote the land to the south of the site (car park adjacent to 125 London Road) for wider retail development. This will enable the council to regenerate a vulnerable district centre through economic investment and growth.

In addition, the new NPPF promotes ‘sustainable development’ which takes into account relevant market and economic signals. Given the current economic climate which is stalling housing growth in many areas including Mitcham, we consider that enhanced retail development in this location will assist the Council in delivering its wider master-plan for the area – which is to deliver good retail provision within Mitcham (Mitcham Town Centre Brief SPD).

This leads onto our second point, regarding the consolidation of Mitcham’s town centre boundary – promoted within the accompanying proposal map and supplementary text. It is important to note, that Mitcham is a defined ‘district centre’, with a number of policies directing retail development towards Mitcham.

Overall, we recommend that the Council does not discourage investment, and sustainable economic growth within an important and established retail destination by consolidating its current town centre boundary. Indeed in line with the new NPPF retail development should be encouraged, as long as the development meets the key tests identified. As such, we consider that the consolidation of Mitcham district centre could discourage and hinder sustainable economic development – by preventing the regeneration of existing and established retail sites, which are currently located within the centre. This includes our client’s site.

Therefore, we consider that in order to promote economic growth and investment the Council should seek to extend the town centre boundary. This will enable developers to have access to a variety of land, in line with their business needs in order to locate to Mitcham – a key consideration within the NPPF.

In addition, the extension of the town centre boundary will also enable current landowners the opportunity to regenerate an existing retail site which does not contribute to the current street frontage of London Road. Given the sites
established use, we consider that the site and the land located to the south of the site should be promoted within the ‘Sites and Policies DPD’ for retail development.

If you have any queries, please contact us on the number provided below.

Yours Sincerely,

Pp. Reford

Rob Scadding
PLANNING POTENTIAL

Tel: 020 7357 8000
Local Development Framework
Sites & Policies Development Plan Document (DPD)

Call for Sites Consultation

From 15th July – 9th September

www.merton.gov.uk/LDF
Section A:  ‘Call for Sites’ Introduction

Following the recent adoption of Merton’s Core Planning Strategy, we are starting preparation of a Sites & Policies Development Plan Document (Sites & Policies DPD). As illustrated in figure 1 below, we are at the early stages of development for the Sites & Policies DPD, and we are currently at the ‘Call for Sites’ Stage.

As part of the ‘Call for Sites’ stage, we invite landowners, developers and other interested parties to suggest sites likely to have potential development or redevelopment between 2011 - 2026. By engaging at this stage of the consultation process you will be able to submit proposals for consideration for site allocation(s), for future use or development of land such as:

- Housing;
- Employment;
- Retail;
- Leisure;
- Community uses;
- Art, culture and tourism; and,
- Mixed use development.

Also, at this stage we invite you to highlight any development management issues for consideration as part of preparation of the development management policies, which will form part of this Sites & Policies DPD. Suggestions could include proposed policies to guide the design of shop frontages and change of use.

Submitted sites and proposals should have a reasonable prospect of coming forward in the period up to 2026.

Figure 1: Merton’s Progress with the Site & Policies DPD

We are here!

Initial Preparation
May – June 2011

Call for Sites Consultation
July – August 2011

Public Consultation on Draft
January – March 2012

Submission to Secretary of State
March 2013

EIP hearing
June 2013

Inspectors Report
August 2013

Adopted by Council
October – December 2013

Completed Stage

Current Stage

Future Stages

Please use the following link to access Merton’s Local Development Scheme 7th Edition (July 2011) which provides information on the progress and status of future Development Plan Documents or Supplementary Planning Documents and details of the various stages of the preparation, examination and adoption of Development Plan Documents: http://www.merton.gov.uk/environment/planning/planningpolicy/ldf.htm.
Section B: Response Form: Site Identification Form

Consultation Information:

To participate please return this form, with a map clearly identifying the boundary of the site, by Friday, 9th September 2011.

Before completing this Site Identification form, please refer to the guidance notes which are detailed in Section D: 'Call for Sites' Questions and Answers and Section E: Guidance Note for the 'Call for Sites' Consultation.

One form only should be completed for each site to be considered.

In circumstances where groups or organisations share a similar view as to the future development or use of a site, it would be helpful if one submission could be made. It would also be useful if the group/organisation state how many people the submission is representing and how the representation was authorised.

Contacting Us:

Please submit your response electronically: ldf@merton.gov.uk

Alternatively you can return the representation form by fax or post:

London Borough of Merton,
Strategic Planning and Research,
Future Merton Team,
Civic Centre, 12th Floor,
London Road,
Morden,
SM4 5DX

Fax: 020 8545 4160

Submitting your responses via email does not restrict you to office hours and is also friendly to the environment.

Further Information:

For further information regarding this consultation stage or to request additional forms please contact the Strategic Planning and Research Team on 020 8545 4141/3837. Forms can also be downloaded from: www.merton.gov.uk/environment/planning.htm.

This form is available on Merton's website to download both in PDF and Word Format.
Please fill in all the sections (if known) in the Sites Identification Form. Please tick ( √ ) where appropriate. Information marked with an asterix (*) is required information and should be filled in.

### Site Identification Form: Part 1

**Your details:**

<table>
<thead>
<tr>
<th>(i) Your Name*:</th>
<th>Rob Scatting</th>
</tr>
</thead>
<tbody>
<tr>
<td>(ii) Company/ organisation (if relevant)*:</td>
<td>Planning Potential</td>
</tr>
<tr>
<td>(iii) Address*:</td>
<td>148 Tooley Street</td>
</tr>
<tr>
<td></td>
<td>County/City:</td>
</tr>
<tr>
<td>(iv) Telephone number*:</td>
<td>020 7357 8000</td>
</tr>
<tr>
<td>(v) Email*:</td>
<td><a href="mailto:rob@planningpotential.co.uk">rob@planningpotential.co.uk</a></td>
</tr>
</tbody>
</table>

**(vi) I am an/a ............... (please tick the relevant box)*: |

- Owner of (all or part of) the site: ✔
- Land agent:
- Developer:
- Registered social landlord:
- Planning consultant:
- Local resident:
- Community Group:

**(vii) If acting on behalf of a client please inset their name, address and contact details*: |

<table>
<thead>
<tr>
<th>Name:</th>
<th>CBRE Global Investors acting on behalf of Landowner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>C/O The Agent</td>
</tr>
<tr>
<td>Telephone number:</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
</tbody>
</table>

**(viii) Please insert the name, address and contact details of the site owners*: |

<table>
<thead>
<tr>
<th>Name:</th>
<th>CBRE Global Investors acting on behalf of Landowner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
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<tr>
<td>Telephone number:</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
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</tbody>
</table>

**(ix) Does the owner(s) support your proposal(s) for the site*? |

Yes: ✔
No: |
### Site Identification Form: Part 2

**Site details:**

1. **Site Address**: 117-125 London Road, Mitcham

2. **Grid Reference**: (e.g.) Merton Civic Centre - 525576, 168474

3. **Postcode**: CR4 2JA

4. **Site area (hectares)**: 0.24 hectares

5. **Current use (please specify last use if vacant)**: Retail – Use Class A1

6. **Suggested use(s)**: Retail – Use Class A1

7. **Relevant Planning History (please tick which is relevant for your site)**:
   - Pre-application advice:
   - Planning Application Submitted:
   - Planning Application Decision Received:
   - Appeal:

8. **Relevant Planning History reference number[s]**:
   - 87/P1195
   - 89/P0707
   - 90/P0365
   - 92/P0768
   - 94/P0500
   - 94/P0801
   - 99/P0741
   - 01/P1213
   - 09/P2073
### Site Identification Form: Part 3

#### Additional Information to help assess the site:

| (i) Are there any factors which might pose barriers to the availability and or development potential of the site: | Land in other ownership must be acquired to bring this site forward for development: |
| | Current use needs to be relocated: |
| | Physical constraints (e.g. access, topography, trees, other): |
| | Issues with viability (e.g. lending availability, contamination & other financial implications): |
| | Restrictive covenant exists: |
| (ii) Please provide comments/ information to explain how you could/ intend to address these issues identified above: | N/A |
| (iii) Level of developer interest: | Strong – client keen to develop land for retail purposes |
| (iv) Please indicate the approximate timescale for availability*: | 0-5 years: short-term |
| | Up to 2016 |
| | 6-10 years: medium term |
| | Up to 2021 |
| | 10-15 years: long term |
| | Up to 2026 |
| (v) Please provide comments/ information to explain why you chose this timescale for you site’s availability*: | The client is keen to progress an application within the next five years. |
| (vi) Any other relevant information: | In respect of our client’s site (117-125 London Road) it is important to note that it is an established retail destination. Indeed the planning history of the site dates back to 1994, where a change of use was granted from a home improvement centre to a retail warehouse (Application Reference: 94/P0500). As a result, the use of the site for retail purposes has been established for over ten years. |
(i) Please provide information on any issues that could be considered and addressed by development management policies:

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(ii) If you are not already on our consultation database, and you would like to receive information on the progress of Merton’s Sites & Policies DPD and other LDF consultations, please tick below as to your preferred method of contact.

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<tr>
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In order to improve our service and meet different customer needs we monitor all aspects of service delivery. Please help us to meet this aim by completing the monitoring section of this form. All information given voluntarily will be kept confidential and processed anonymously.

These questions do not relate directly to the subject matter we are contacting you about; however they help us ensure that we communicate appropriately with all our customers. Thank you, in advance for your time.

Are you: Male ☑ Female

What is your age group?

<table>
<thead>
<tr>
<th>Age Group</th>
<th>25 - 29</th>
<th>30 - 34</th>
<th>40 - 44</th>
<th>45 - 49</th>
<th>50 - 54</th>
<th>55 - 59</th>
<th>60 - 64</th>
<th>65 - 69</th>
<th>70 - 74</th>
<th>75 or over</th>
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Do you consider that you have a disability? Yes ☐ No ☑

How would you describe yourself? (tick one box only)

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<tr>
<th>Asian or Asian</th>
<th>Black or Black British</th>
<th>Chinese and other ethnic group</th>
<th>Mixed Ethnicity</th>
<th>White</th>
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<tbody>
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<td>British</td>
<td></td>
<td></td>
<td>White &amp; Asian</td>
<td>Gypsy/Roma/</td>
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<td>Chinese</td>
<td>White &amp; Black</td>
<td>Traveller</td>
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<td>Caribbean</td>
<td>African</td>
<td>White-English</td>
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<td>Korean</td>
<td>White &amp; Black</td>
<td>White-Irish</td>
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<td>Caribbean</td>
<td>White-Scottish</td>
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<td>White-Welsh</td>
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</table>

Any other background (please specify in the box):

What is your faith / belief?

Buddhist ☐ Christian ☐ Hindu ☐ Jewish ☐ Muslim ☐ Sikh ☐

Any other faith / belief (please specify in the box):
Section D: ‘Call for Sites’ Questions & Answers

What is the ‘Call for Sites’?

The ‘Call for Sites’ Consultation is an eight week formal consultation period (from 15th July to 9th September 2011). Interested parties can suggest sites in the borough for development or for change of use; these sites should have a realistic prospect of being developed by 2026.

What is the Sites & Policies Development Plan Document (DPD)?

The Sites & Policies DPD will form part of Merton’s Local Development Framework. Once adopted, the Sites & Policies DPD will replace existing ‘saved’ policies and specific site allocations in Merton’s adopted Unitary Development Plan (2003).

The Sites & Policies DPD will set out the general approach to development; the use of land and buildings in the borough and to provide guidance for development management to support the effective delivery of planning decisions and allocate sites in Merton. The Sites & Policies DPD and the accompanying Proposals Map will allocate land for development and for particular uses. The Proposals Map will be revised each time a DPD with spatial expression is produced.

How should I respond to this Call for Sites Consultation?

Should you wish for us to consider a site within the LB Merton, please complete and submit a ‘Site Identification Form’ which is provided in Section B of this consultation document and a map clearly identifying the site boundary. At this initial assessment phase, there is no threshold (for instance, no minimum or maximum site size) restricting sites that would be considered, although we will reserve the right to place a threshold on sites that will be included in the Sites & Policies DPD in the future.

How will the information I have submitted be used?

Submitted sites and the accompanying information will be reviewed and assessed objectively by the council against the aims and objectives of the Core Strategy and consistency with the overall spatial strategy, to evaluate if these sites should be potentially included in the Sites & Policies DPD. Only appropriate and deliverable sites will be taken forward in the Sites & Policies DPD.

What will happen when I submit a response form to this consultation?

Information provided will be used to inform the Sites & Policies DPD and other DPD(s) which form part of the council’s emerging Local Development Framework. We are aware that some of the information that we are requiring is commercially sensitive, therefore this information will not be past onto third parties and only used for strategic planning purposes.

What happens next?

We may contact you after the consultation period to discuss your submission(s); as we may require further information and/or to invite you to a consultation workshop or meeting. As detailed in Figure 1: Merton’s progress with the Sites & Policies DPD, the next stage will be another Public Consultation on the draft DPD, which will take place between January and March 2012.
Sites put forward for consideration should be submitted on the **Site Identification Form** which is located in **Section B** of this consultation document. This form is available for download in both PDF and Word format from Merton’s website. Maps clearly identifying the site boundary (ordinarily the boundary edged in ‘red’ colour font) should be submitted with the Site Identification Form. **We will only accept sites for consideration that are submitted for consideration via this Site Identification Form.**

In addition to the Site Identification Form, if it is felt that additional information needs to be submitted, this should be provided in no more than 5 sides of A4 paper. Should we require further information, we will contact you.

Although we appreciate that you may not have all the required information for the site, the more detailed information you can provide us with, will help us to effectively appraise and consider the site’s suitability for inclusion in the Sites and Policies DPD.

**We cannot accept anonymous or confidential submissions**, as we may need to contact you in the future; for further information and/or to invite you to attend consultation workshops. You may prefer to use an agent to act and submit site proposals on your behalf. Agents, for example, would include a planning or surveying consultant, architects, solicitors, estate agents and a family member.

Submitted sites should not have planning permission for development unless a new and different proposal is likely in the future.

There should be a reasonable chance that the site(s) submitted will become available for (re)development in the period up to 2026.

Sites submitted should be located within the London Borough of Merton administrative area. However if any sites submitted cross Merton’s administrative boundary into a neighbouring local authority area, we would also need to know the full extent of these sites.

Sites proposals put forward for future development or change of use will not necessarily be selected for inclusion in the Sites & Policies DPD.