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Dear Sir/Madam

SITES AND POLICES DEVELOPMENT PLAN DOCUMENT CONSULTATION REPRESENTATION MADE BY: THE CO-OPERATIVE GROUP

We write on behalf of our client, The Co-Operative Group, to submit representations to the Draft Sites and Policies Development Plan Document.

The Co-operative Group ("The Co-op") is a key stakeholder within the London Borough of Merton, with its convenience stores playing a very important role in sustaining the vitality of viability of many of the centres within the Borough's retail hierarchy. The Co-op has five convenience foodstores currently trading within the Borough and is committed to maintaining and strengthening the role of these stores, to ensure that the day-to-day convenience shopping needs of the residents within the Borough are met in a sustainable way.

As you may be aware, The Co-op is currently developing proposals for significant regeneration investment in two of its stores within the Borough, the store at 276-288 Kingston Road, Wimbledon Chase and 300 Grand Drive, Morden. Formal pre-application meetings are scheduled to take on place on 29 March 2012 with Planning Officers at the Council to review emerging proposals for the comprehensive redevelopment of the two sites. It is within this context that The Co-op makes the following submissions to the Draft Sites and Policies Development Plan Document.

POLICY DMR1: Location and scale of development in Merton's town centres

ID 9: Grand Drive (300 – 372 Even)

As stated above, The Co-op is currently developing proposals for the comprehensive regeneration of its current store and site at 300 Grand Drive, Morden. The current store plays an essential role in the food retail offer within the Neighbourhood Parade, providing for the day-to-day convenience needs of the local community. However, the store is now

out-dated and needs upgrading to ensure it provides the retailing experience expected by its shoppers.

The Co-op also owns the surface level customer car park adjacent to the store, which is currently within the boundary of the Neighbourhood Parade as defined in the adopted 2003 Unitary Development Plan (UDP).

It is the intention of The Co-op to redevelop the existing store and the adjacent car park as part of a more comprehensive mixed use regeneration scheme, in accordance with Core Strategy Policy CS7, which encourages an appropriate mix of uses to enhance the vitality and viability of centres. The comprehensive redevelopment of the entire Co-op site will enable additional floorspace to be included on the ground floor, with the potential for residential uses above. This provides the opportunity to strengthen the overall offer of the Neighbourhood Parade and enhance the vitality and viability of the centre.

To assist with this regeneration, The Co-op requests that the draft Neighbourhood Parade boundary for Grand Drive (300 – 372) should retain the Co-op car park within the boundary, as is the current situation with the adopted 2003 UDP Proposals Map. This site will allow the car park area to be developed for town centre uses and ensure that this underutilised brownfield site can contribute to the regeneration of the centre; helping to improve the vitality and viability of the Parade, and improve choice and competition. Furthermore, the car park site will provide for a natural boundary to the centre, as previously provided for in the adopted UDP, and The Co-op contends that there is no sound justification for its omission.

In our view, the retention of this car park site within the Neighbourhood Parade is consistent with the scale and function of the centre, with the potential to enhance the overall quality of the Parade and better meet the needs of the local community and its retention would be compliant with national policy.

A plan indicating the extent of the Neighbourhood Parade boundary proposed by The Co-op is appended.

ID 24: Wimbledon Chase (288 – 312 Kingston Road & 1a Rothsey Avenue to 353 Kingston Road)

The Co-op is also progressing proposals to comprehensively regenerate its existing foodstore and surface level customer car park site at 276 – 288 Kingston Road, Wimbledon Chase. Again, this store is outdated and overall the site fails to fully contribute to the vitality and viability of the centre.

The Co-op is currently in the process of preparing proposals for the regeneration of the site that will provide a new modern and updated foodstore, along with other new units to enhance the offer in the Neighbourhood Parade, and residential at upper floor level. A key component in maximising the regeneration potential of the site is to redevelop the

car park area with a development block that continues the retail frontage along Kingston Road. The concept of a mixed use development on this site would comply with Core Strategy Policy CS7.

The Co-op proposes that this car park area be included within an extended Neighbourhood Parade boundary. As the customer car park area forms part of the existing foodstore site and is integral to the store's operation, it is reasonable to include it within the defined Neighbourhood Parade boundary, particularly when the redevelopment of the site is likely to come forward in the short term. Furthermore, this site is the most sequentially preferable location on which to accommodate further town centre uses should there be any scope for further development in the future, and on this basis it is our view that the car park should be included within the Neighbourhood Parade boundary.

The inclusion of the car park site would be consistent with the role, scale and function of the Neighbourhood Parade and its inclusion will provide greater scope for the redevelopment of the Co-op foodstore to provide more modern, efficient and competitive floorspace. This will help the vitality and viability of the centre.

Failure to allocate the car park would have the potential to reduce the scope for the redevelopment of this dated store and underutilised site, and impose an unnecessary obstacle to its beneficial and sustainable redevelopment, which would be contrary to the objectives of the NPPF.

A plan indicating the extent of the Neighbourhood Parade boundary proposed by the Co-op is appended.

Site Proposal 25: Emma Hamilton Public House, 328 Kingston Road, Raynes Park

We object to the draft site designation of the Emma Hamilton Public House site for retail uses as in our view such a designation is unsound. This site lies outside of the defined existing and emerging Wimbledon Chase Neighbourhood Parade and in PPS4 terms is edge-of-centre.

An allocation for an edge of centre site should be supported by evidence demonstrating that the site is either the most sequentially preferable site on which to accommodate town centre uses or that there are other material considerations to outweigh the policy conflict with PPS4, which promotes the town centres first principle.

If the Council has identified a need for additional retail floorspace within Wimbledon Chase, it should first seek to focus any future growth within the defined centre, and if there are no available, suitable or viable sites then this growth should be focussed within the most sequentially preferable location.

In our view it is not sound to allocate this site for retail with no evidence demonstrating need or its sequential preference. On this basis we request that the retail allocation for the site is deleted.

In summary, The Co-Operative Group:

- **Objects** to the proposed boundary of the Grand Drive Neighbourhood Parade and suggests an amendment which would overcome the current objection;
- **Objects** to the proposed boundary of the Wimbledon Chase Neighbourhood Parade and suggests an amendment which would overcome the current objection; and,
- **Objects** to the proposed allocation of retail for the Emma Hamilton Public House and seeks its deletion.

If you have any queries with this representation please call David Roach (020 7911 2437) or Richard Foot (020 7911 2737) at this office.

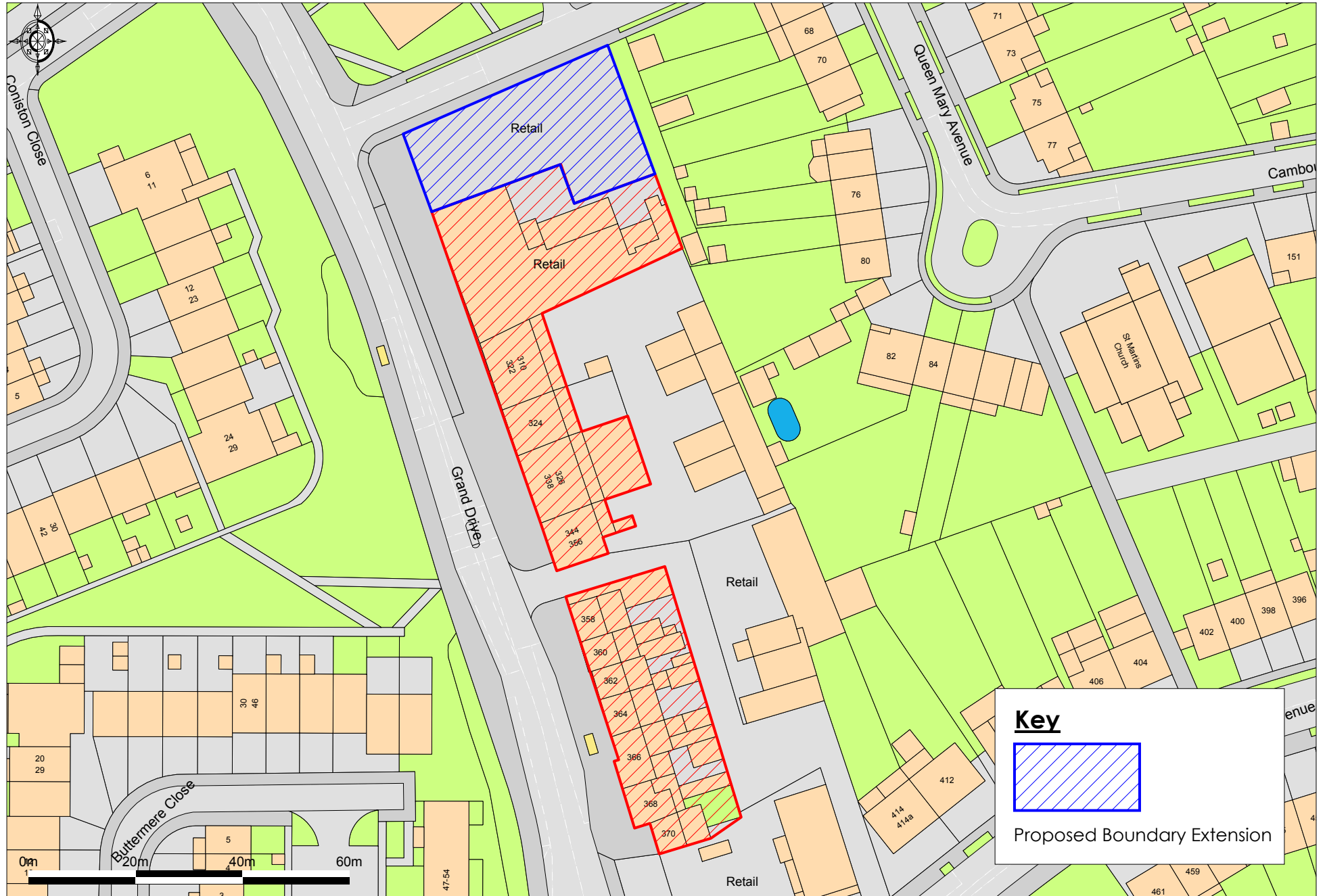
Yours faithfully

A handwritten signature in black ink, appearing to read 'GVA.', is positioned below the 'Yours faithfully' text.

GVA

Enc Revised Neighbourhood Parade boundary maps for Grand Drive and Wimbledon Chase

Proposed Boundary Extension - Grand Drive



Proposed Boundary Extension - Wimbledon Chase

