



BNP PARIBAS REAL ESTATE

Spatial Planning Policy
London Borough of Merton
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BY EMAIL & POST

Our ref: MTW/NIF/101836/F/003

27 February 2013

Dear Sir/Madam

REPRESENTATIONS TO SITE AND POLICIES DEVELOPMENT PLAN DOCUMENT (DPD) LAND AT 86 BUSHEY ROAD, RAYNES PARK

We are instructed by Ignis Asset Management (Ignis) to submit representations to the 'Sites and Development Plan Document (DPD) (January 2012).

Ignis represent the landowners of the site identified at 86 Bushey Road in Raynes Park and as such are significant landowners in LB Merton. Our client has previously submitted representations to the Core Strategy, Call for Site Policies DPD, and the former version of this DPD.

We therefore make our representations within this context by setting out some background information about the site, followed by our comments in relation to the above document.

LAND AT BUSHEY ROAD, RAYNES PARK

The site occupies a prominent location on the A3 near Raynes Park within the LB Merton. It is located on the north side of Bushey Road (A298) and close to the A3 intersection which provides access to the M25 and A308.

The site is situated between land parcels which are identified as 88 and 84 Bushey Road and have potential to come forward for development.

The site comprises an office building to the front with a warehouse to the rear. The premises for lease have been vacant for several years, despite the fact that the property been extensively marketed over this period.

To the north of the site is a mixture of housing and a primary school. To the west of the site is the A3 Beverley Way, and to the south of the site is the A298, Bushey Road and a Tesco Extra Store.

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PLANNING CONTEXT

Local Planning Policies

In LB Merton's Unitary Development Plan and Core Strategy (adopted 2011), the site is designated on the following basis:

- Industrial Land - where Class B2 and B8 uses are encouraged and limited Class B1 development may be permitted (Policy E3).
- Locally Significant Industrial Building – where policy seeks to improve LSIS; ensuring that they contribute towards business, industrial, storage and distribution functions (Policy CS12);
- Locally Listed Building – Policies seek to protect and enhance Locally Listed buildings. The building is recognised to be an inter war industrial building, built in 1930s angular style and is deemed to have good architectural style (Policy BE.11 and CS14).

PROPOSED ALLOCATION

The Council's preferred use (for both parts of the site) is for:

'An employment-led mixed use scheme research and development (B1[b] Use Class), light industrial appropriate in a residential area (B1[c] Use Class) and storage or distribution (B8 Use Classes) that may include an appropriate mix of any of the following: bulky goods retail (A1 Use Class), car show room (sui generis Use Class) and school (D1 Use Class)'.

REPRESENTATIONS

We fully endorse and support LB Merton's proposal to allocate the site as Site Proposal 48b for a range of uses in principle.

However, we consider the proposed policy to be restrictive in so far as the policy seeks to secure a employment led scheme comprising Class B1 (b) and (c) uses, despite the fact that LB Merton acknowledge in the policy text that the 'marketing of both parts of the site has shown little to no interest in retaining the current office/light industrial use for the vacant areas of the site.

In this context, we therefore suggest that LB Merton make the following changes to the Policy 48b:

- Allow the potential for employment generating uses including B1[b] Research and Development, B1[c] Light Industrial, B8 Storage or Distribution, bulky goods retail (A1 Use Class), car show room (sui generis Use Class) and school (D1 Use Class).
- In addition, the description could also be amended to allow the potential to provide Class D2 leisure and Class C1 hotel uses on the site as part of any forthcoming scheme, where it can be demonstrated that there is no harm to the vitality and viability of the town centres in the Borough.

We consider that providing greater flexibility around the land uses for the site will enable the site to come forward for the most appropriate mixed use development and will optimise the development potential of the site without restriction, particularly in this economic climate where there is no certainty about the range of operators which might be interested in occupying space on the site.



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The policy also refers to a requirement for 'careful scrutiny of access and junction arrangements needed to minimise impacts on movement, congestion and road safety in particular wider impacts on strategic road network (TLRN). Transport assessment must consider the potential effects on the whole site. Poor permeability and accessibility by public transport. Infrastructure/service improvements expected to support comprehensive redevelopments.

We consider the need to consider the impact of any future development of the site on the local highway to be a reasonable request. However, a requirement to consider the impact of the development across both sites should not in any way frustrate the ability to bring forward Site 48b independently on its own merits within a specific timeframe.

Lastly, the description of the site refers to the current use as Offices B1[a] former Thales Avionics. However, this description should be amended to include the fact that the site comprises an industrial unit to the rear of the site.

CONCLUSIONS

We consider the proposal to allocate the site for mixed use development is sound and should be supported and adopted with in the emerging Site and Policies DPD. However we request that the proposed allocation be amended in line with our requested changes as set out above.

We also request to be notified of the next consultation stages of this document and other associated Local Development Framework documents in order to reinforce this position.

We reserve the right to make changes to and to provide supplementary information in relation to this submission. We should be grateful if you would acknowledge receipt of these representations. Please contact Nicola Forster at the above address.

Yours faithfully

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