

our ref: **BF/Q30313**
your ref:
email: ben.ford@quod.com
date: 27th February 2013



Future Merton
London Borough of Merton
Twelfth Floor
Civic Centre
London Road
Morden
SM4 5DX

Dear Sirs,

26 BUSHEY ROAD - SITE PROPOSAL 77
STAGE 3 DRAFT SITES AND POLICIES DEVELOPMENT PLAN 2013

We now make representations to the Stage 3 Sites and Policies Development Plan Document Consultation which expires after Wednesday 27th February 2013. As this submission is made prior to this expiry period and as such the submission should be considered valid, and taken into account as part of the consultation process.

The submission is specific to 26 Bushey Road, formerly known as Raynes Park Service Station and is identified in the Stage 3 Document as Site Proposal 77. As a matter of principle, we support the Council's preferred use of the premises for residential purposes and consider that such a use is consistent with development plan policy at both local and strategic levels.

The site is considered an underused brownfield site within an existing residential area. The site is subject to time-expired buildings and likely contamination and therefore remediation to bring the site up to environmental standards will only be realised through appropriate residential development.

Notwithstanding this, we do not consider that there is demand for the existing premises; that the existing buildings are time expired; that redevelopment of the site for economic purposes is unviable and indeed unacceptable given the local residential community and therefore given the adopted NPPF requirements to make best use of underused brownfield land for residential purposes it is considered appropriate to identify the site for such a use.

In terms of a residential use, development can adequately be accommodated within the requirements of the Council's Urban Design Standards and can be supported by local social infrastructure.

As such, there is no material justification to not progress with the Council's own preferred use for residential purposes at this site. To do so would conflict with its own development plan policy and that adopted within the London Plan. Further adopted National Planning Policy Framework paragraph 22 confirms that planning policy should avoid the long term protection of employment sites where there is no reasonable prospect of the site coming forward for that purpose. The Council has already confirmed its opposition to industrial and office new build in this location.

Page 2

As such, applications for alternative uses of land should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. There is an identified need for housing within the Borough and market signals have identified that this is an appropriate use.

We welcome the chance to comment on the consultation document and would be grateful if you can continue to keep us informed of its progression.

Yours faithfully,



Ben Ford
Director