

Gregory Gray Associates

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

8th February 2013

Dear Sir/Madam,

MERTON'S SITES AND POLICIES DEVELOPMENT PLAN DOCUMENT

I write on behalf of my client, The Garden Centre Group, lessees of Lower Morden Garden Centre, Lower Morden Lane, Morden.

Lower Morden Garden Centre is a well-established garden centre which is a significant local employer and provides a specialist retail facility for local residents in a sustainable location given its proximity to residential areas and public transport links. The site is located within a settlement however is excluded from the identified district centre of Morden.

The support contained within the NPPF for ensuring the vitality of town centres is recognised and it is accepted that this provides the basis for the retail policies DM R1 – 7 included in the Sites and Policies DPD. However, it is noted that DM R2 – ‘Development of Town Centre Type Uses Outside Town Centres’ refers to adopted Core Strategy Policy CS7 which indicates that outside town or local centres, new town centre type uses will be discouraged.

It is not accepted that the general application of this approach in relation to all out-of-centre developments, including some specialist forms of retailing, would be entirely consistent with the NPPF. Paragraph 23 requires Local Authorities to “*set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres*”. Failure to provide appropriate support for certain specialist forms of retailing has the potential to have a serious adverse impact upon the local economy and employment market.

Garden Centres falls within this category since they comprise a retail use which, due to its distinctive character, has specific locational requirements which make it best suited to an out-of-centre site. Typically, they require a high proportion of open land for the display of plant material and their tendency to sell low value, bulky products renders it economically unviable for them to retail from a town centre location.

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The NPPF is unashamedly pro-growth and states (para. 20) that “to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century”, in doing this they are required to ‘support existing business sectors’. Thus, whilst national guidance advocates a ‘town centred’ approach, the NPPF does not suggest that this should be at the expense of the sustainable growth of specific business sectors which cannot occupy town centred locations.

Accordingly, and in line with the NPPF, it is requested that an additional policy be included within the Sites and Policies DPD which would provide specific guidance in relation to garden centres, in recognition of the specific locational requirements that render them inappropriate for a town centre location.

The suggested wording for such a policy is set out below:

Policy DM R8 –Garden Centres

New garden centre development will be permitted where:

- *It comprises a ‘sustainable form of development’ with reference to its economic, social and environmental impacts*
- *It would not undermine the viability or vitality of nearby town or district shopping centres or other local shopping facilities;*
- *It complies with the design requirements set out elsewhere in this Plan.*

I would be grateful if the above comments could be taken into account in the finalisation of the Council’s Site and Policies DPD. Should you wish to discuss this matter, please do not hesitate to contact me.

Yours faithfully



Joanna Male