



London Borough of Merton
Strategic Planning and Research
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By email and post
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26 February 2013

Our ref. HG/PSD/11380001

Dear Sir/Madam

**LONDON BOROUGH OF MERTON SITES AND POLICIES DEVELOPMENT
PLAN DOCUMENT – DRAFT CONSULTATION DOCUMENT (STAGE 3)**

SITE PROPOSAL 46: THE OLD LAMP WORKS, 25 HIGH PATH

We write on behalf of our client Wisepress Ltd, owner of the above site, in respect of the current draft consultation stage of the Sites and Policies Development Plan Document. The submission of these representations follows a meeting with officers on 12 November 2012 to discuss the above site which is proposed to be allocated (Site Proposal 46) and subsequent correspondence with officers in respect of the ongoing unsuitability of the site for its existing use.

From review of the current consultation document, the Council now proposes that the site should be allocated for mixed-use residential and community uses.

In line with our previous representations, we wish to re-iterate our in-principle support for the Council's recognition that the site is suitable for redevelopment. In particular, we are encouraged that the Council continues to agree that the site is suitable for solely / predominantly residential use.

However, the latest consultation document has now also raised the potential for the site to accommodate community uses as part of a mixed-use scheme. We are concerned about this proposed allocation as there doesn't appear to be any basis for the proposed community use allocation.

In particular, no evidence has been put forward to show that there is demand for any type of community use at this location. As such, we do not believe that the proposed addition of a community use is robustly justified and, thus, fails to meet a key criterion for meeting soundness of Local Plans as set out at Paragraph 182 of the NPPF. Without this justification, the proposed allocation cannot be taken forward as currently drafted.

The draft document further notes the site has been identified as potentially suitable for a school in conjunction with the adjacent garages site to the west. We are uncertain if this refers to the proposed community use allocation of the site or is a separate standalone allocation. However, we understand that this is proposed purely on the basis of a Report prepared by Capita Symonds which

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suggests that the site could have potential to accommodate an extension to the Merton Abbey School.

Overall, a proposed school on the site is a highly speculative proposition of which it appears there is an extremely limited prospect of happening. The key reasons for this are as follows:

- the site would only be suitable if it came forward with an adjacent site under different ownership;
- the Council would need approval for any attempt to acquire the site when other sites identified within the Capita Symonds Report are already in its ownership; and
- The proposal must be accepted by our client.

Given the absolute uncertainty of any of the above happening, it must be acknowledged that there is extremely limited potential for the site to come forward for a school use.

Furthermore, we question the feasibility of providing an extension to the Merton Abbey School at this site given that it is not physically connected to the site and indeed, is located on the opposite side of the road. This raises significant queries as to how the site would work as an extension to the existing school in respect of accessibility, functionality and safety.

Given the above, we do not consider that this site can be credibly promoted as an extension to the Merton Abbey School.

The only evidence that has been put forward relates to the suitability of the site for residential use. As such, we believe that the only sustainable option is to allocate the site for solely residential use. However, without prejudice to this position, and if the Council still believes that community uses can be accommodated on the site, we consider that a flexible allocation should be brought forward which outlines a solely residential use or a mixed-use residential and community use. This will allow a community use to come forward if it is justified at an application stage that there is sufficient demand for it.

Conclusions

In summary, we would like to re-iterate our support for the Council's proposed allocation of the Old Lamp Works site for redevelopment. Furthermore, we welcome the Council's recognition that this site is suitable for residential use.

For the reasons set out in this letter, we consider that the Old Lamp Works site is not appropriate for a school use while no evidence has been promoted to support community use at this site. Instead, we consider that solely residential uses are much more suitable on this site and it should be promoted for such use to ensure its compatibility with the surrounding area. At the very least, a

flexible allocation should be promoted which allows for solely residential development of the site or a mixed-use residential and community use allocation. This would allow for the community uses to be adequately justified at the application stage but doesn't negate development from coming forward if there is no demand for this type of use.

We look forward to confirmation that these representations have been received and please do not hesitate to contact me if you wish to discuss any of the issues raised in further detail.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Helen Greenhalgh', written in a cursive style.

Helen Greenhalgh

cc: Ms P Head, Wisepress Ltd