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Land at Bond Road, Mitcham, CR4 3HG

London Borough of Merton Draft Local Plan  
Representations

Prepared by Barton Willmore LLP on behalf of  
Hoo Hing Ltd and Elbrook Cash & Carry Ltd

February 2021

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## 1.0 INTRODUCTION

- 1.1 These representations are submitted in response to the London Borough of Merton (LBM) Stage 2a Draft Local Plan (LP) consultation on behalf of Hoo Hing Ltd and Elbrook Cash & Carry Ltd.
- 1.2 The Site at Bond Road, Mitcham ('the Site') is owned by our clients, it is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The Site amounts to some 1.3 ha. A Site Location Plan is attached at **Appendix 1**.
- 1.3 Our clients wish to promote their land interest through the emerging LP for a residential site allocation for the reasons set out in this report. This Report firstly provides some background to the Site and its suitability for residential use. Following this, we assess the Draft Local Plan and provide our detailed response to the consultation and the need to allocate further sites for residential in order to meet housing need.

## 2.0 THE SITE AND SURROUNDINGS

- 2.1 The Site is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The Site amounts to some 1.3 ha. A Site Location Plan is attached at **Appendix 1**.
- 2.2 The Hoo Hing Cash & Carry is situated adjacent to the Asda supermarket which fronts to Western Road (A236). They both share a vehicular access directly from Bond Road. The Hoo Hing building is located perpendicular to Bond Road and has a large building floorplate with an office and staff ancillary services to upper floors. It has customer car parking to the frontage and is serviced via a loading area to the rear.
- 2.3 The Elbrook Cash & Carry is located to the east and has direct vehicular access from Bond Road, with customer car parking to the front. The main building has a large floorplate and is a building of notable height with ancillary offices to the upper floors to the front section of the building, the rear being given over to the cash and carry to enable products to be stored to the maximum height of the building as one storey. There are further buildings to the rear that store products to replenish the cash and carry. The loading / service area is to the east of the main building.
- 2.4 To the rear of the site along the southern boundary of the site is a further four storey building providing a banqueting hall facilities and restaurant known as Chak89. To the east of this is a further storage building associated with the Elbrook Cash & Carry. Beyond this is a two-storey building providing office accommodation and an industrial kitchen with car parking to the front. These buildings are all accessed /serviced from the main Bond Road vehicular access point. However, there is a further access from the adjacent site to the east.
- 2.5 To the east of the site is the Embon Cash & Carry and further workshop / employment uses. Beyond this is the Bond Primary School. The northern side of Bond Road is primarily residential in character, with what is understood to be a 43 flat sheltered housing scheme of 3 storeys in height (LPA Ref: 11/P1772). Beyond this to the east are two storey terraced residential properties. To the south west is the Sadler Close residential development comprising residential blocks of circa five storeys in height with surface level car parking. The blocks span Sadlers Close and are linked by raised residential links at upper levels. On the opposite side of Western Road is the former Mitcham Gasworks.

- 2.6 The Site is not within a Conservation Area. The nearest listed building is the Grade I Eagle House fronting London Road. Further, there are no Tree Preservation Orders (TPO's) on the Site. Only a small part of the site falls within an Archaeological Priority Zone. The Site is located in its entirety in Flood Zone 1 on the Environment Agency's online mapping and therefore not at risk of flooding. There is no planning history relevant to redevelopment of the Site for alternative use.
- 2.7 The site is PTAL Level 3. It is located 600m from Mitcham Town Centre. It lies circa 1 mile from Colliers Wood Underground Station providing Northern Line services into central London in 30 minutes. It is 1.3 miles to Mitcham Junction Train Station providing Southern Railway services to Epsom, Sutton, London Victoria and St Albans. Moreover 0.8 miles to the Phipps Bridge Road Tram Station providing services to Wimbledon to the north and Croydon to the east.

### **3.0 THE CASE FOR DEVELOPMENT: THE ALLOCATION OF BOND ROAD**

3.1 The following section assesses the Site's development potential in the context of the emerging Local Plan and the soon to be adopted New London Plan (NLP).

#### **Available and Deliverable**

3.2 The site is 1.2ha and falls within two landownerships. As such complex land assembly would not be required to bring the Site forward. It is our client's desire to secure an allocation and pursue planning permission. This would allow the early delivery of new homes from 2023/24 onwards. The site is therefore available and deliverable.

#### **Lack of Physical and Technical Constraints**

3.3 The site is previously developed with limited vegetation, and therefore impact on landscape and biodiversity will be minimal. The Site is not liable to flooding, nor does it sit within close proximity to any heritage assets. The site falls partly within an Archaeological Priority Zone which is not considered to be an impediment to development.

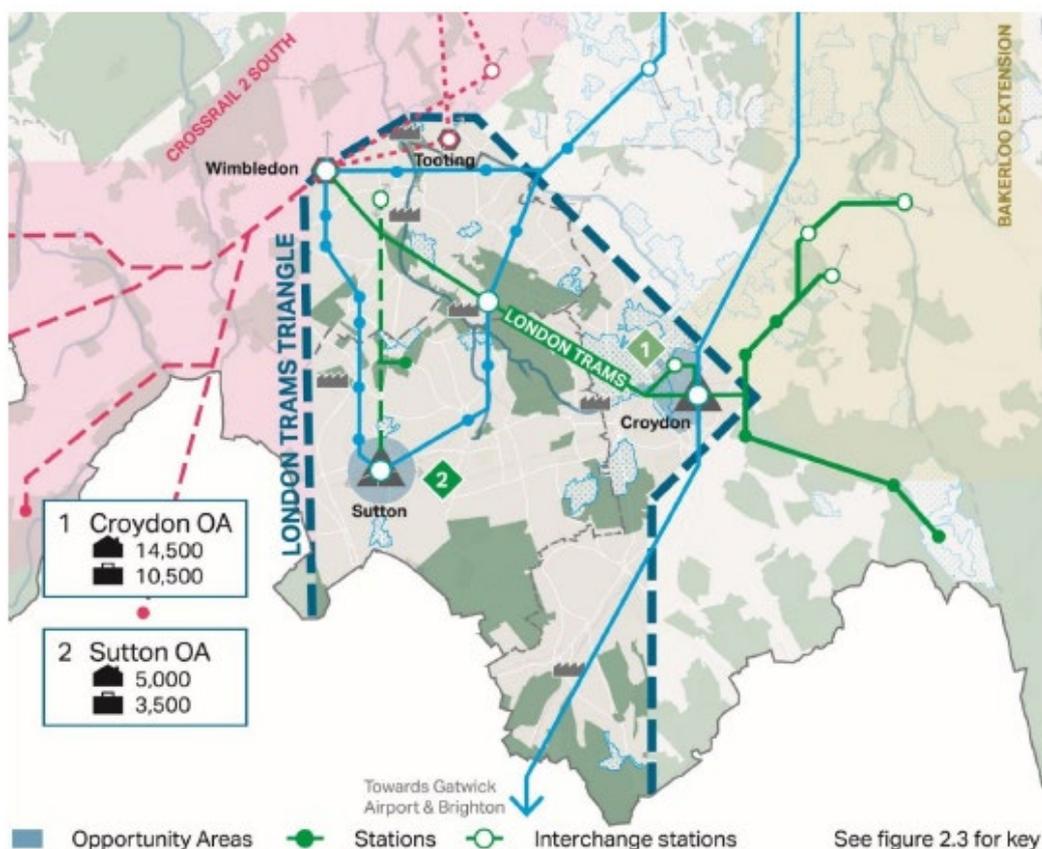
3.4 In terms of access, it is anticipated at this stage that Bond Road would be capable of accommodating acceptable access points for residential development. Further, that a residential scheme could be accommodated in terms of highways capacity, and indeed would be likely to have a significantly reduced impact in terms of a) vehicle movements; and b) residential amenity, compared to the existing uses on the site. This would be assessed and tested further through a planning application.

3.5 The potential technical constraints associated with the former Mitcham Gasworks is considered below.

### The Role of Mitcham in achieving good growth

- 3.6 The emerging Local Plan (LP) seeks to respond to the draft New London Plan (NLP) and the importance on achieve good growth. NLP Policy SD1 Opportunity Areas identifies areas with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Rather than see Opportunity Areas in isolation the NLP seeks to identify Growth Corridors to demonstrate linkages between the Opportunity Areas (OAs) to ensure that the full potential of the growth corridors and OAs are realised.
- 3.7 In this respect Mitcham is situated near the Crossrail 2 Growth Corridor and the Wimbledon / Colliers Wood / South Wimbledon OA which has an indicative capacity of 5,000 new homes. Moreover, the site falls within the Trams Triangle / London-Gatwick-Brighton mainline Growth Corridor which is broadly delineated by Tooting to the North, Croydon to the East and Sutton to the West and identifies Sutton and Croydon as OAs, see extract below:

Figure 2.12 – Trams Triangle



- 3.8 We support the importance placed in the emerging LP on creating good growth and that the broad locations of growth being the Wimbledon/Colliers Wood/South Wimbledon OA and Morden Town Centre. Beyond this the LP envisages that development will take place, but not to the same scale.
- 3.9 The LP identifies that Mitcham experiences problems of deprivation including health, income and housing challenges. We would question whether the LP is sufficiently aspirational in its approach to Mitcham and the areas that fall between Tooting, Croydon, Morden and Colliers Wood and the associated major infrastructure and services investment being directed to these areas. The LP should seek to ensure that this investment and growth achieves maximum benefits and stretch within the Borough. Moreover, the opportunity to achieve growth and regeneration in Mitcham in its own right.
- 3.10 We note that the Key Diagram defines a broad extent of the area to be covered by the future Opportunity Area Planning Framework and that this includes Mitcham. This is supported and we would welcome engagement on its future preparation and the role of Mitcham. In the interim, in our view the LP needs to be more aspirational in the role Mitcham and the need for development to facilitate the growth and regeneration of these areas. This includes the allocation of further sites within Mitcham to deliver growth and assist in responding to the identified problems of deprivation and housing challenges.

### **Changing Pattern of Development**

- 3.11 The character of the surrounding area has undergone change in recent years as considered below, however there is a need for further improvements. The Draft Merton Borough Character Study, which forms part of the LP evidence base, identifies that the Site falls within the Sadler Close Character Area, which includes the Mitcham Gasworks. The Study identifies it as an 'area requiring enhancement to reinforce identify'. It is the lowest scoring Character Area in Mitcham. The Study notes the lack of relationship between buildings and street edges and the poor architectural quality of retail and industrial buildings. It specifically identifies the need for public realm improvements to Bond Road.

- 3.12 The allocation of the Site for residential use offers the potential to provide improvements to Bond Road and Western Road through public realm improvements, improved street edges and high-quality architectural buildings. Residential use would also be consistent with the existing land use character of the area which includes residential to the north and south of the site. The site is also of a sufficient size to enable an appropriate interface to be achieved with the Cash & Carry on the adjacent site to the east and employment uses / workshops beyond to ensure their continued operation.
- 3.13 The allocation of the Site would also provide an opportunity to contribute to the emerging changing pattern of development through the redevelopment of the Mitcham Gasworks located on the other side of Western Road, opposite Asda. This the subject of an allocation in the emerging Draft Local Plan (Site Mi16) for "Residential led mixed-use development with open space and community use (Clinics, health centres, crèches, day nurseries, day centre)." It is also the subject of an existing allocation in the Adopted Local Plan (Site 75)
- 3.14 The Mitcham Gasworks was the subject of an outline grant of planning permission dated 28<sup>th</sup> July 2009 (LPA Ref 06/P0984) secured on appeal for 'the redevelopment of the 3.97ha site for a mix of uses comprising residential (C3) (1.95ha); employment (B1) (1.28ha); Live Work (0.05ha); and public open space (0.65ha)'. From the emerging site allocation, it is understood that the residential element of the permission (Hay Drive) has been built out, however that the employment element to Western Road lapsed in July 2012. The site is being jointly promoted by St William Homes LLP and National Grid Property.
- 3.15 It is clear that if the entirety of the site is to be redeveloped, a further planning permission will be required. In this respect, whilst the allocation includes residential use, it notes that the potential land uses, and layout are currently constrained by the existing gasholder which, whilst no longer used, has not been officially decommissioned. It is understood that the developers are proposing its formal decommission. However, until such time as this has been completed, development is still limited by the Health and Safety Executive's land use planning method (PADHI).

- 3.16 Attached at **Appendix 2** is Drawing 2081\_SK\_565B Illustrative Layout as cited at para 2 of the Appeal Decision Notice. This drawing shows the PADHI Zones and that residential development was approved to the Outer Zone, with non-residential uses within the Inner Zone and Middle Zone. Having regard to the zones, only a small proportion of the Bond Road Site falls within the Middle Zone. Most of the Site falls where residential was considered acceptable as per the July 2009 Permission, i.e. the Outer Zone and beyond. It is therefore considered that even if the gasworks is not formally decommissioned, that residential development can come forward on the Site and the PADHI considerations can be addressed at application stage through a detailed site layout. However, like the Mitcham Gasworks allocation, the formal decommissioning of the gasholder will open wider possibilities in terms of layout and use to this part of the site.
- 3.17 The allocation of the Mitcham Gasworks seeks to change the pattern of development and character of the area. The allocation notes the 'excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to the overall surroundings and connectivity to the town centre'. Moreover, the opportunity to deliver much needed new homes.
- 3.18 The allocation of the Bond Road Site is consistent with the existing and emerging character of the area and would offer the opportunity to contribute to these objectives. It also offers an exciting opportunity to deliver substantial new homes within close proximity to the town centre and assist addressing the existing housing problems in Mitcham. It could also make a valuable contribution to addressing the Borough's affordable housing needs.

### **Contribution to Housing Need**

- 3.19 The NLP sets out a need for 9,180 new homes in LBM over the period 2019/20 to 2028/29 (Table 4.1), whilst annual targets have been removed from the London Plan this would equate to 918 units per annum. This represents a notable increase from the London Plan 2016 annual target of 411 dwellings for LBM. The Draft LP Policy No H4.2 sets out an aim to deliver 13,263 additional homes for the period 2020/21-2034/35, this would equate to an annual target of 947 per annum.

- 3.20 We consider the housing requirement and the housing delivery issues associated with Draft Policy No. 4.2 in Section 4 below. However, by way of summary the NLP target should be a minimum due to the unmet housing need in London but also given the likely review of London Plan housing targets.
- 3.21 We would highlight that with 50% of the Council's historic delivery of housing (based on the 411 target) being achieved by small sites (under 10 units), the increase in housing target will need to be met by allocation of large sites for residential use. In addition, the jump from a target of 411 to 947 units per annum will require a step change in housing delivery in the borough. This also points to the need to allocate further sites to ensure housing supply and achievement of housing targets.
- 3.22 The Bond Road Site represents an opportunity to provide a notable number of homes towards the annual requirement and meet local housing needs including the provision of affordable homes.

### **The Proposed Allocation**

- 3.23 To assist the preparation of the next draft of the Local Plan, we enclose at **Appendix 3** wording for the draft allocation of the Site using the Council's template.

## 4.0 RESPONSE TO LOCAL PLAN

- 4.1 Overall, our clients are broadly supportive of the approach to growth and the importance of meeting housing needs, but question whether the Draft LP will achieve the housing targets without the allocation of further sites and a review on the approach to employment sites.

### Policy No. H4.2 Housing Provision

#### The Housing Requirement

- 4.2 The NLP sets out a target of 9,180 new homes in LBM over the period 2019/20 to 2028/29 (Table 4.1), whilst annual targets have been removed from the NLP this would equate to 918 units per annum.
- 4.3 The Draft LP Policy No H4.2 sets out an aim to deliver 13,263 additional homes for the period 2020/21-2034/35, this would equate to an annual target of 947 per annum. From supporting paragraph 4.2.2 this appears to be based on the NLP target. Whilst it would reflect the NLP for the period up to 2028/29 (i.e. the NLP 10-year target), it is unclear what target Draft Policy H4.2 is using for the 6 years to 2034/35. The NLP states the following at para 4.1.12:

**“If a target is needed beyond the 10-year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and roll forward the housing capacity assumptions applied in the London Plan for small sites.”**

- 4.4 In this respect it is not clear what process LBM have taken to establish the housing requirement for this period beyond 2028/29. This needs to be clarified.

- 4.5 The 2017 London Strategic Housing Market Assessment (SHMA) which forms part of the NLP evidence base concludes that there is a pan London need for an additional 65,900 homes per year between 2016 and 2041 to meet existing and future need, of which 47% would need to be affordable homes and 18% intermediate. The Mayor's Annual Monitoring Reports (AMRs) show delivery of 38,533 (2015/16); 45,505 (2016/17) and 32,083 homes (2017/18) in the last 3 years, a considerable shortfall against assessed housing needs.
- 4.6 The NLP targets should therefore be a minimum starting point in the context of the pan London shortfall against targets and resultant unmet housing need. Indeed, at the time of Examination of the NLP, it was widely considered that there was a need for an early review to housing targets. Moreover, the Secretary of State has identified the need for an early review of the NLP against the policies of the NPPF 2019. Instead of a review progressing, there has been notable delay to the adoption of the NLP. The Panel's Report was received in October 2019, over a year ago.
- 4.7 In terms of a review against the NPPF Policies, this sets out the assessment Local Plans should undertake to establish housing targets. Paragraph 60 reads: *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."*
- 4.8 The 'Housing Needs and Economic Assessment' (HNEA) Planning Practice Guidance (PPG) which supports the NPPF states, *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations"*<sup>1</sup> (our emphasis). PPG clarifies the *need* assessment should be unconstrained and separate from determining a housing *requirement*.

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<sup>1</sup> PPG ID2a-001

- 4.9 PPG goes on to state that Standard Method (SM) "identifies a minimum annual housing need figure. It does not produce a housing requirement figure."<sup>2</sup> (our emphasis)
- 4.10 Under the New Standard Method December 2020, the minimum annual need figure for Merton would be 2,051 units per annum. This is over double the NLP target of 9,180 (918 per annum). Indeed, all London Boroughs see an increase. This points again to the need for the need for an early review of the NLP housing targets and indeed for Draft Policy 4.2 to look forward rather than backwards and have regard to the Standard Method and not simply relying on the NLP target for the period to 2028/29 or indeed beyond this to 2034/35. This approach is likely to worsen housing need in the short, medium and long term given the historic shortfall in provision across London and that the minimum annual need figure as per the Standard Method is higher for all London Boroughs and is more than double the NLP target for Merton.
- 4.11 In short there is a need to review the minimum annual housing need in Merton, review land availability and establish the appropriate housing requirement figure and allocate sites / write planning policies to positively achieve that housing requirement and growth. Certainly the SHLAA 2017 indicates that there is a greater capacity for housing growth in the borough compared to the NLP target set. The SHLAA 2017 identifies a 10-year capacity of 13,280 with an annual capacity of 1,328 dwellings.

### **Housing Delivery**

- 4.12 The emerging draft Policy No. 4.2 housing target of 13,263 additional homes for the period 2020/21-2034/35 equates to an annual target of 947 per annum.

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<sup>2</sup> PPG ID2a-002

- 4.13 Paragraph 73 of the NPPF highlights that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. Moreover, that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of 5% to ensure choice and competition in the market for land, 10% where the local planning authority wish to demonstrate a five-year supply of deliverable sites or 20% where there has been a significant under delivery of housing over the previous three years.
- 4.14 The draft LP does not appear to have this, nor does it form part of the evidence base. The Council's Annual Monitoring Report 2018/19 includes Graph 4.6 Merton Housing Trajectory, but this does not relate to the consultation Draft Local Plan. It does not show the NLP target as being met in the first 5 years or beyond to 2029/30 or an appropriate buffer.
- 4.15 The trajectory is needed to enable scrutiny of the draft LP to ensure that it is able to deliver the housing requirement over the plan period. For example, is the growth strategy sufficiently ambitious to achieve the requirement, are sufficient sites allocated to ensure housing supply and are the policies positively prepared and will they be effective in achieving the requirement?
- 4.16 This is especially important as achieving the NLP target will require a step change in housing delivery in the Borough. The Council Annual Monitoring Report 2018/19 sets out housing completions as follows:

**Table 4.1 – Home Completions 2008/9 – 2018/19**

Financial Year	No. of homes	Target (London Plan)	% of target achieved
2004/05	987	430	230%
2005/06	791	430	184%
2006/07	427	430	-1%
2007/08	435	430	101%
2008/09	774	370	209%
2009/10	338	370	-9%
2010/11	357	320	-4%
2011/12	453	320	142%
2012/13	478	320	149%
2013/14	440	320	138%
2014/15	459	320	143%
2015/16	743	411	181%
2016/17	434	411	106%
2017/18	675	411	164%
2018/19	273	411	-34%
<b>Total</b>	<b>8,064</b>	<b>5,754</b>	<b>140%</b>

- 4.17 Whilst delivery has exceeded the current London Plan 2016 target of 411, the latest five-year average is 517 dwellings per annum. This falls significantly short of the draft annual target of 947 per annum and will require a notable step change in approach. The Draft LP will need to address and facilitate this step change. In this respect it is noted that para 4.2.1 of the Draft LP indicates that the borough has substantial experience in delivering small sites, noting that every year between 85%-95% of Merton's planning applications for new homes are for small sites which deliver less than 10 homes. These contribute 50% of housing numbers in Merton whilst the remaining 50% comes from large sites.
- 4.18 The above would point to a consistent delivery of small sites that are unlikely to be extrapolated up to reflect the increased housing target. On this basis the notable uplift in housing delivery will need to come from large sites. To achieve this there is a need for an ambitious growth strategy and a need to increase the number of housing allocations to ensure that not only the minimum NLP housing target is reached but exceeded.
- 4.19 There is also a need to critically review the LPs approach to other policies that may restrict the delivery of housing, we consider that further below.

**Strategic Policy EC7.1 Promoting economic growth and successful high streets****Policy EC7.3 Protection of scattered employment sites**

4.20 It is noted that in addition to policies protecting Strategic Industrial Land (SiL) and Locally Significant Industrial Sites (LSIS) the draft LP includes Policy EC7.3 relating to what is referred to as 'scattered employment sites.' These are understood to be non-designated sites in employment use, with paragraph 7.3.1 seeking to ensure that a wide range of employment uses are caught by the policy. The policy wording resists loss of such sites to residential uses except where:

- i.** The site is located in a predominantly residential area and it can be demonstrated that its operation has had a significant adverse effect on local residential amenity;
- ii.** The size, configuration, access arrangements and other characteristics of the site make it unsuitable and financially unviable for whole-site employment use; and
- iii.** It has been demonstrated to the council's satisfaction that there is no realistic prospect of employment or community use on this site in the future. This may be demonstrated by full and proper marketing of the site at reasonable prices for a period of 30 months (2½ years).

If proposals do not meet policy requirements of E7.3 (a) (iii) above, the council will seek measures to mitigate against the loss of employment land. Such measures may include providing employment, as part of a mixed-use scheme on site."

4.21 The above is a repeat of Policy DM E3 of the Adopted Sites and Policies and Policies Map July 2014. We would question whether the above policy is positively prepared or will achieve the growth aims of the Local Plan. For example, the above policy has the effect of restricting residential use, but without a housing trajectory it is unclear whether Merton can achieve the increased housing requirement which will require a step change in housing delivery and approach to planning policy.

4.22 We would also question whether the policy is consistent with the provisions of the NLP. Policy E7 Industrial intensification, co-location and substitution sets the policy position for non-designated industrial sites. It states the following:

C Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:

- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
- 2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or
- 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space).

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Parts D2 to D4 below.

4.23 We would question why the Adopted NLP Policy is not sufficient to achieve the Council's aims. The proposed approach will see both policies applied on some sites and serves to add an unnecessary additional layer development management causing confusion and uncertainty. For these reasons the policy is not effective and should be deleted.

## 5.0 SUMMARY AND CONCLUSIONS

- 5.1 It is clear that there are exorbitant housing needs London-wide. Whilst LBM have met their historic housing needs, this has been based on a low target of 411 per annum compared to other London Boroughs. The NLP target (918 per annum) more than doubles the requirement to be met. Indeed, the Standard Method December 2020 identifies a minimum annual need figure for Merton of 2,051 units per annum. Whilst this is not a housing requirement, it does indicate the extent of need that would not be met by the NLP housing target. Moreover, it is also over three times the current target that LBM are used to meeting.
- 5.2 There is a need for a step change in housing delivery to meet the housing requirement. This requires a change in approach to the preparation of the LP, a change to the approach and number of site allocations and development management policies. For example, the historic supply that LBM are used to achieving is based on 50% provision on small sites (i.e. 200 units per annum). This supply from small sites is unlikely to be capable of being extrapolated up to reflect the new housing requirement. Indeed, that approach is also unlikely to achieve good growth or ensure that the growth and regeneration potential of the various OAs and growth corridors and their surrounding areas are achieved.
- 5.3 There is a need to allocate further large sites for residential use and to ensure that policies are prepared positively to achieve necessary growth and do not unnecessarily duplicate and /or add further details to the those in the NLP. In this respect the Local Plan needs to be more aspirational in terms of the role of Mitcham and its need for growth and regeneration.
- 5.4 The allocation of the Bond Road Site would serve to assist the above. It is available and deliverable and could contribute to housing supply and affordable housing within the first 5 years of the plan period. There are no physical or technical constraints to delivery. The allocation of the Site would also provide an opportunity to contribute to the changing pattern of development coming forward through the redevelopment of the Mitcham Gasworks located on the other side of Western Road, opposite Asda. Moreover, contribute to the recommendations of the Draft Merton Borough Character Study, which identifies the area as 'requiring enhancement to reinforce identify'.

5.5 In summary, the Draft Local Plan should be amended as follows:

- The Draft Local Plan should be mindful of the Standard Method and set out how it would seek to address the needs arising from application of this within the Borough.
- Publish the housing trajectory and details of how the step change in housing requirement will be achieved.
- Allocate further sites to ensure that NLP targets, and indeed identified need, can be met earlier in the Plan period.
- Allocate Bond Road site as a residential allocation; and
- Delete Policy EC7.3 Protection of scattered employment sites as it adds further unnecessary duplication and development management control to sites.
- Review of other LP policies to determine whether there are positively prepared, effective and will achieve the growth required.

**APPENDIX 1  
SITE LOCATION PLAN**



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-



Site Boundary

## PLANNING

Project  
**Bond Road  
 Mitcham**

Drawing Title  
**Site Boundary Plan**

Date	Scale	Drawn by	Check by
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Project No	Drawing No	Revision	
32565	AT-P10-001	-	

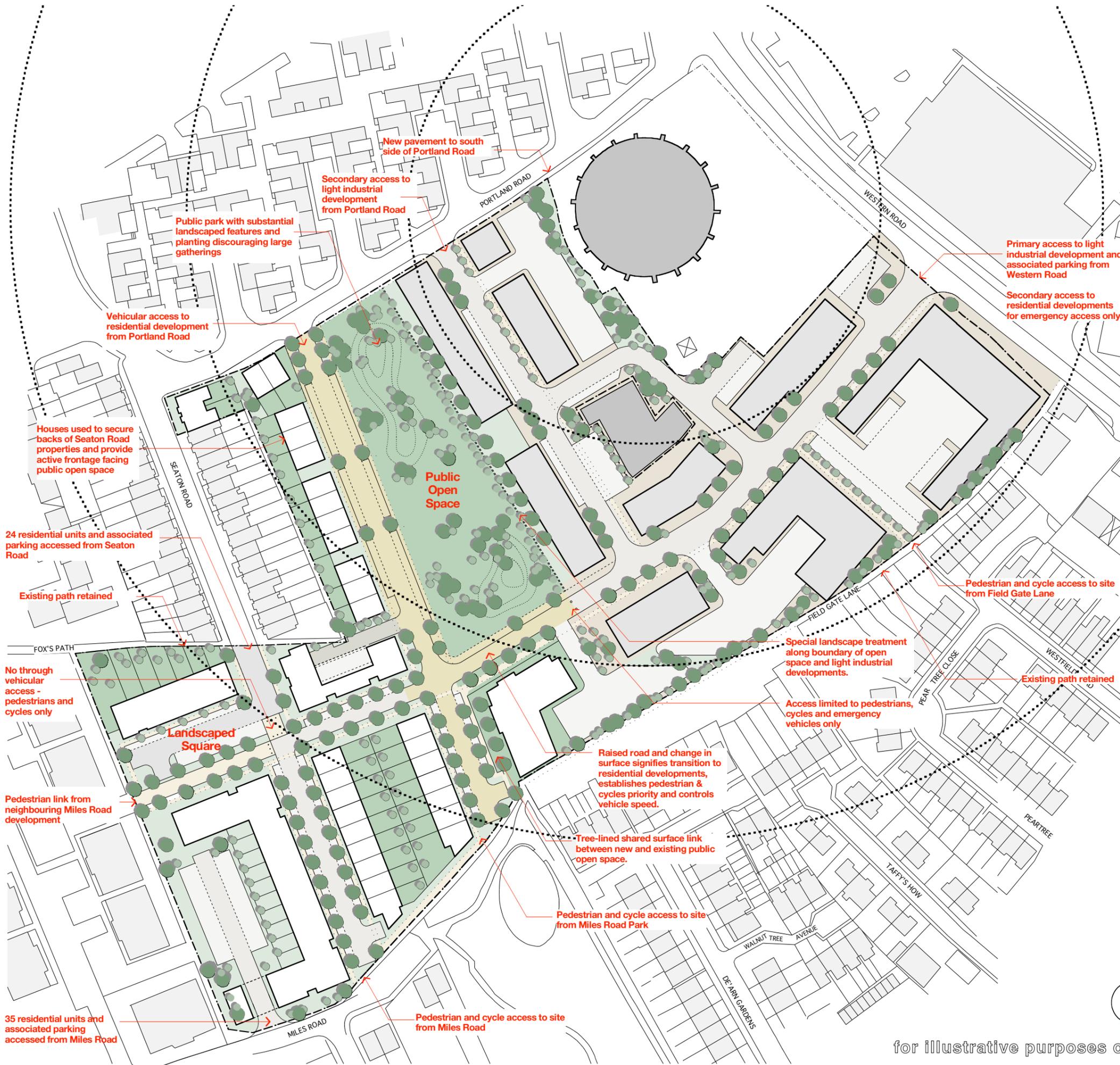
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**APPENDIX 2**  
**DRAWING 2081\_SK\_565B ILLUSTRATIVE LAYOUT**



- Residential Developments
- Light Industrial Developments

Western Road Mitcham  
**Illustrative Layout**

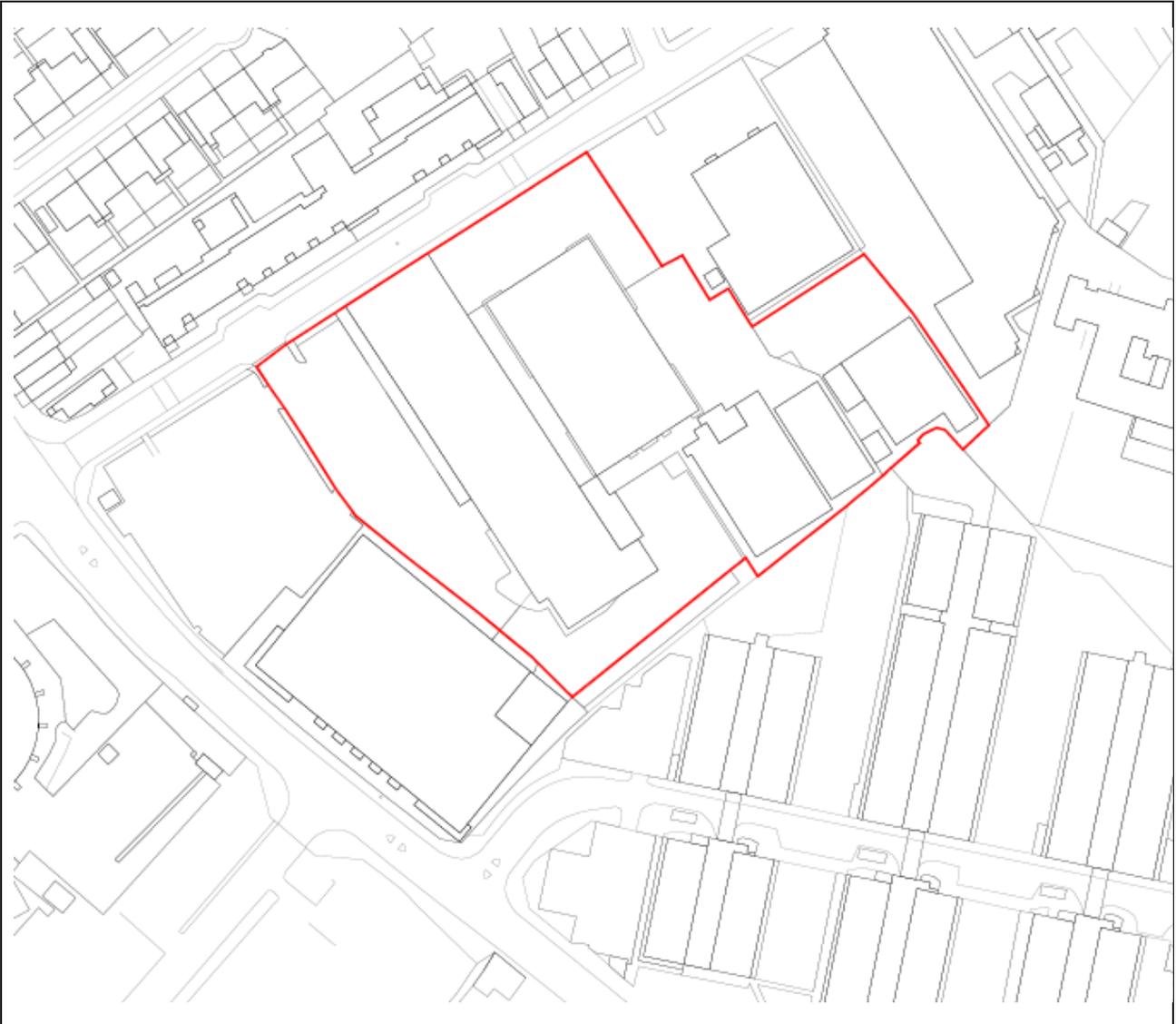
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application reference	<b>06/P0984</b>	
drawing no.	<b>2081_SK_565B</b>	
revisions	-- First Issue.	20.11.07
	A Minor amendments.	04.04.08
	B Layout amended to comply with Health and Safety Executive PADHI guidelines.	02.04.09

**National Grid Property**  
**Richards Partington Architects**

for illustrative purposes only

**APPENDIX 3  
DRAFT ALLOCATION**

## BOND ROAD, MITCHAM



**Ward:** Lavender Fields

**Site description:** The site is brownfield and occupied by the Elbrook Cash & Carry and associated buildings, Chak 89 banqueting hall and the Hoo Hin Cash & Carry. The site is bound to the west by the Asda supermarket fronting Western Road and to the east a further Cash & Carry building and other employment buildings. The site fronts Bond Road to the north, which is predominantly residential in character. To the South is Sadler Close which is also residential. The existing cash & carry buildings have large building footprints and heights. Customer parking and loading areas are accessed via Bond Road.

**Site area:** 1.3ha

**Existing uses:** Sui Generis Cash & Carry and associated buildings, banqueting hall and restaurant.

**Site allocation:** Residential development.

**Site deliverability:** In private ownership. Delivery 0-5 years.

**Design and accessibility guidance:**

The site currently has a poor relationship to Bond Road. Redevelopment of the site would provide an excellent opportunity to enhance the public realm through high quality urban design and architecture and allowing development that makes a positive visual impact to Bond Road specifically, the overall surroundings and connectivity to the town centre.

The development must achieve a satisfactory relationship with the adjacent supermarket and employment uses to enable their continued operation whilst not fettering the development potential of the sites in the long term.

Consideration will need to be given to the proximity of the nearby Mitcham Gasworks (Allocation Site Mi16). The landowners of that site are proposing to decommission the gasholder but until that time development within the vicinity of the gasholder is subject to restrictions set out in the Health and Safety Executive's land use planning method (PADHI) which limits the potential for residential-led development in close proximity of the gasholder. This may give rise to layout considerations to a small part of this site should it come forward ahead of the decommissioning of the gas holder. The majority of the site is free from this constraint.

Development proposals must deliver much needed new homes, play space and open space.

**The site location**

Approach to tall buildings	Redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
Impacts Listed Buildings or undesignated heritage assets	Any tall buildings would need to be considered in the context of the Grade I Eagle House fronting London Road.
Impacts a Conservation Area	No
Impacts an Archaeological Priority Area	Mitcham archaeological priority zone.
Impacts a Scheduled Ancient Monument	No
Impact on flooding from all sources	No
Is in a town centre	No, however, the site is very close to / from Mitcham town centre.
Is in an Opportunity Area	No, but is falls within the intended Opportunity Area Planning Framework.
Impacts a designated open space	No
Impact on ecology designation	No
Public Transport Accessibility Level (PTAL)	PTAL 3 good access to public transport.

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