



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

Your reference Local Plan Consultation 2a Response
Telephone 020 7399 5884
Email Victoria.Bennion@eu.jll.com

29th January 2021

Dear Sir/Madam,

RESPONSE TO MERTON LOCAL PLAN CONSULTATION STAGE 2A TO PROMOTE RESIDENTIAL DEVELOPMENT AT THE IMO CAR WASH SITE, 57 HIGH PATH, MERTON, SW19 2JY

This Supporting Statement is prepared on behalf of our client, 57 High Path Limited. It is submitted to the London Borough of Merton as part of the Stage 2a Draft Local Plan Consultation in response to draft Policy EC7.2 'Protection of Scattered Employment Sites' to support and promote the allocation of the IMO Car Wash Site, 57 High Path, Merton for residential development and therefore included in its emerging Local Plan. The Site can be delivered in the first five years of the new Local Plan period.

Site Location and Description

The Site is located within the London Borough of Merton and is approximately 0.1 hectares in area. The Site is a commercial site in operation as an automated car wash, which features a large car park car wash (sui generis) and is situated between High Path and Merantun Way (A24). The Site is located between South Wimbledon Town Centre to the northwest and Colliers Wood Town Centre to the northeast, circa 500m to each respectively.

Following recent planning permissions and pending applications on the adjoining and neighbouring sites along High Path and Station Road for residential development this Site would also be a suitable location for a residential development and should therefore be considered for allocation within the London Borough of Merton Local Plan.

General Approach

57 High Path Limited supports the rationale behind the New Local Plan and the further clarity it will provide to both applicants and decision makers. 57 High Path Limited has reviewed the questionnaire prepared by the Council and consider that many of the questions posed show ambition and recognition of the challenges that London and London Borough of Merton are facing. In particular, the acknowledgement of the need to ensure consistency with the Draft London Plan and the need to tackle the housing crisis are welcomed. However, 57 High Path Limited are concerned that draft Employment Policy EC7.2 requires additional thought and revision, our comments are set out herein and also seek to promote the IMO Site for exemption of the draft policy and allocation for residential development.

Policy EC7.2 'Protection of Scattered Employment Sites'

The IMO Site is not currently proposed to be allocated within the Emerging Merton Local Plan, however, according to emerging Policy EC7.2 'Scattered Employment Sites', the Sui Generis automated car wash site would be considered a 'Scattered Employment Site' and therefore the Council would seek to retain this for employment use.

Given that the Council would consider the IMO automated car wash site (which only provides employment for two people) an employment generating use, any application for residential use on this site would be resisted unless it can be demonstrated that the three criteria set out in Policy EC7.2 can be met. The criteria to be met within the emerging policy are far too restrictive for such a small employment generating Sui Generis site and therefore more consideration needs to be given to the policy or in fact to the range of sites that are considered to fall under the 'Scattered Employment Sites' category.

The Policy in its current form is not in line with the objectives of the NPPF or the Publication London Plan (2020) which promotes the release of commercial land for residential development. The emerging London Plan states that boroughs are encouraged to assess whether the release of land for alternative uses is more appropriate if demand cannot support employment uses in the existing locations. Furthermore, the Publication London Plan also highlights the need to release commercial land in locations that are well-connected by public transport, walking and cycling in order to contribute to other planning priorities including housing. Given that the IMO Site is located within a well-connected location and in an area where intensification and the redevelopment for residential use is supported, we believe that the Site should be exempt from the policy implications and in fact allocated for residential development.

The policy needs to be reworded to exclude unallocated Sui Generis employment sites that only provide limited job opportunities from needing to meet the relevant criteria. In its current form, the Policy is too restrictive and should look to promote the release of Sui Generis sites to provide much needed residential development without the requirement of meeting the criteria of Draft Policy EC7.2.

Suitability for Residential Development

The Site is a suitable location for residential use. It lies in an accessible location with schools, shops, business and community uses nearby. The site is well connected to the surrounding road network, encompassed by several regional scale roads. On the south of the site, the A24 connects the site to London City Centre and to Gatwick Airport. North and west of the site is the A238 and A219 are key routes that lead to New Malden and Wimbledon.

The site has a Public Transport Accessibility Level (PTAL) rating of 4. It is well served by buses and is in close proximity to the South Wimbledon and Colliers Wood London Underground stations. There are a number of local buses which run directly along Merton High Street and Merantun Way.

The character of the area is changing to have an increased residential emphasis. Residential development at the Site would complement both the existing and emerging residential development in the immediate and surrounding area. The surrounding area is subject of significant transformation proposals with both the High Path Estate and the Harris Academy School. As such, the immediate surrounding area is recognised as an area where intensification and redevelopment are supported.

Potential Development on Site

The Site has the potential to provide a residential development providing circa 50 residential units. A draft Site Allocation Wi17 sheet has been prepared and submitted as part of this written representation for your consideration to allocate the Site for residential development (please see Appendix 1).

Conclusion

57 High Path Limited welcomes the opportunity to comment on the London Borough of Merton's approach to bringing forward a New Local Plan and supports the general direction and intention of their approach. However, we strongly recommend that London Borough of Merton amend the wording of Policy EC7.2 'Protection of Scattered Employment Sites' to exclude sites within Sui Generis use which provide limited employment opportunities. Furthermore, we would also recommend that the London Borough of Merton also include the IMO Car Wash Site within their emerging Local Plan as a site allocated for residential development. The Site is in single ownership and control and, as such, is available for redevelopment.

We trust that our comments and proposed Site Allocation Wi17 will be duly considered as the New Local Plan is progressed. Should you wish to discuss these comments or require any further information please do not hesitate to contact Victoria Bennion on 0207 399 5884.

Yours faithfully,

Victoria Bennion

Senior Planning Consultant – Planning, Development and Heritage

JLL



APPENDIX 1: Site Allocation Wi17: 57 High Path

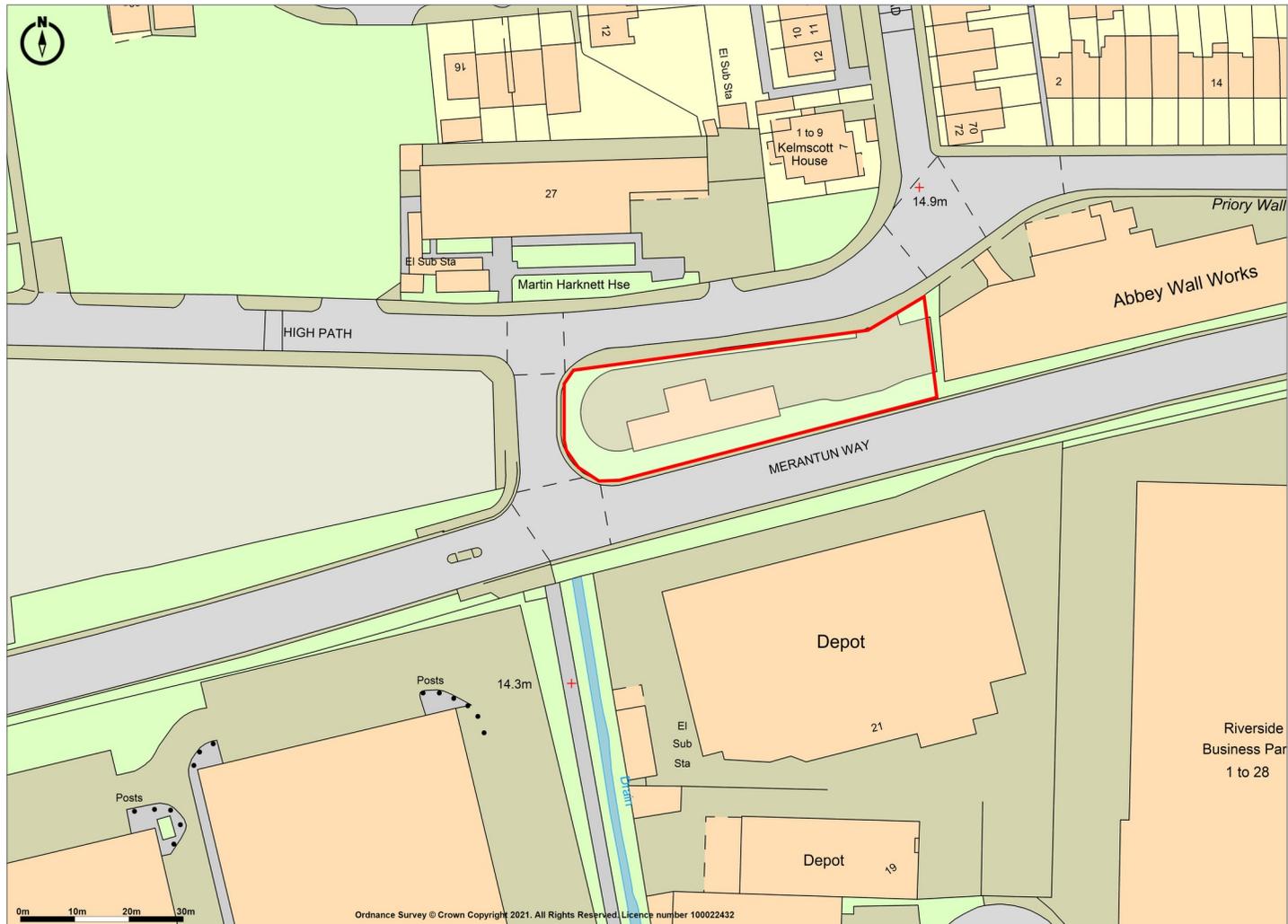
Site Wi17 - 57 High Path, Merton, SW19 2JY	
Ward: Abbey	
Site Description: The Site is a commercial site in operation as an automated car wash, which features a large car park car wash (Sui Generis) and is situated between Station Road and Merantun Way (A24). The site is located between South Wimbledon Town Centre to the northwest and Colliers Wood Town Centre to the northeast, circa 500m to each respectively. The site is adjoining Brookfarm House where an application for a six-storey residential-led scheme is currently under consideration and also Abbey Wall Works where consent has been granted for further residential-led development.	
Site Area: 0.1ha	
Existing Uses: Automated Car Wash (Sui Generis)	
Site Allocation: Residential	
Site deliverability: 57 High Path Limited owned site. Delivery 2-3 years	
Design and accessibility guidance: Development of the site provides several opportunities of the delivery of new homes in an accessible sustainable location, providing new services and homes at a landmark location in the South Wimbledon area. Development should reflect the changing character of the area and maximise development on this brownfield site. Design should take its cues from the recently completed school as well as consented development to the east whilst seeking to create a buffer to the busy road to the south.	
The Site Location	
Impacts Listed Buildings or undesignated heritage assets	No
Impacts on Conservation Area	No
Impacts on Archaeological Priority Area	Yes
Impacts a Scheduled Ancient Monument	No
Impacts on flooding from all sources	The site is in Flood Zone 1 (low probability of flooding)
Is in a Town Centre	No
Is in an Opportunity Area	No
Impacts a designated open space	No
Public Transport Accessibility Level (PTAL)	PTAL 4 good access to public transport



APPENDIX 2: Wi17 Site Allocation Location Map

Site Allocation Wi17 - 57 High Path

Site Location Plan



Promapv2
LANDMARK INFORMATION

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Plotted Scale - 1:1250. Paper Size – A4

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