

PD13260/WE/PM/OP

Future Merton Team  
London Borough of Merton  
Civic Centre  
London Road  
Morden  
SM4 5DX***By email only to: [future.merton@merton.gov.uk](mailto:future.merton@merton.gov.uk)***

01 February 2021

Dear Sir or Madam,

**MERTON NEW LOCAL PLAN – STAGE 2A (REGULATION 18)  
REPRESENTATIONS ON BEHALF OF CBRE GI****Introduction and Background**

Montagu Evans has been instructed by CBRE GI to prepare and submit representations to the London Borough of Merton's Stage 2a New Local Plan, which is open for consultation until 1 February 2021. It is noted that this consultation comprises part of the Regulation 18 consultation required to be undertaken by the Council. Pre-submission, or Regulation 19 Consultation, is anticipated to take place in 2021.

These representations are made and submitted within the context of CBRE's ownership of Shannon Corner Retail Park, ("Shannon Corner" or "the Site"), which comprises three large non-food retail units, currently occupied by Harvey's Furniture, DFS and Carpetright.

The Site is not currently subject to any specific allocations under the adopted development plan of the London Borough of Merton.

**The Emerging National and Regional Planning Context**

These representations are prepared and submitted within the context of both the Government's 2020 consultation on a package of proposals for reform of the planning system in England, spearheaded by the 'Planning for the Future White Paper' and 'Changes to the current planning system: Consultation on changes to planning policy and regulations', and the emerging New London Plan (latest version Publication London Plan as submitted to the Secretary of State in December 2020).

*National Policy*

A key element of the changes set out to the planning system in 2020 was the proposed new approach to the standard method for assessing local housing need, designed to deliver "a number nationally that is consistent with the commitment to plan for the delivery of 300,000 new homes a year, a focus on achieving a more appropriate distribution of homes, and on targeting more homes into areas where they are least affordable". As per this approach, the identified figure for Merton in the consultation document was 1,333 homes per annum.

On 16 December 2020 the Government published its response on local housing need, confirming that it would not be proceeding with the changes set out in the consultation document. Instead, the Government has amended the current standard methodology (as per the NPPF, 2019) by adding a 35% uplift to the post-cap number with it generates for

Greater London and the LPAs containing the largest proportion of the other 19 most populated cities and urban centres in England.

As a consequence of this the Indicative Local Housing Need for Merton increased to 2,051 units per annum. This is the minimum target which the new Local Plan should be planning to meet.

#### *London Plan*

The Mayor sent the Publication London Plan (December 2020) to the Secretary of State on 21 December 2020. The SoS confirmed on 24 December 2020 that besides the need to consider the implications for the Plan of the Airports National Policy Statement, there are no further issues with the London Plan. A formal response is expected by 1 February 2021.

The 2020 Publication London Plan sets a ten year target for net housing completions in Merton of 9,180 homes (918 per annum), an increase of 123% beyond the figure in the adopted Local Plan; notwithstanding the additional target now set at the national level.

The context set by the above documents is of one significant and increasing housing need within Merton. It is noted that in June 2020, Merton Council set out that it could meet 107% of the five-year land supply from 2020/21 – 2024/25 (accounting for the Publication London Plan figure of 918 homes per year from 2021/22). This is on the basis of:

- Sites with planning permission;
- Sites where the principle of residential use has been established through previous planning permissions or refusals that have registered new applications or lodged an appeal;
- Suitable sites undergoing pre-application discussion and there is clear evidence that housing completions will begin on site within five years;
- Council-owned sites with redevelopment potential; and
- Small sites windfall assumption.

Notwithstanding this, it is considered that housing need is to be a major issue in the borough – as across London – in the immediate and longer term. What is clear is that across the emerging Plan period new residential sites will be required and this requires a proper assessment of optimum uses for sites and thereafter optimisation of redevelopment potential. The new Local Plan must properly consider this and provide clear guidance around this in order to ensure the needs of the Borough will be met. The development industry looks to the planning system to provide certainty and this must be an objective for the Local Plan making process.

It is within this context that these representations seek to promote Shannon Corner as a suitable site for a mix of commercial and residential uses, specifically by way of an allocation that can be delivered during the Plan period. To inform this, these representations are accompanied by preliminary feasibility proposals prepared by ECE Architects, which demonstrates one option for the Site's redevelopment. This options shows the potential to deliver circa 1,300 sqm of commercial floorspace, along with 181 residential units. This sketch scheme is included at **Enclosure 1** to this letter.

## **Merton's New Local Plan – Stage 2a Draft Local Plan**

In the context of the redevelopment potential for this site we set out below comments to relevant elements of the Stage 2a Draft Local Plan as published for consultation; identifying where appropriate recommended changes that would help provide the level of certainty that would assist ensuring this potential is met.

### **Good Growth Strategy**

The Good Growth Strategy sets out that:

*“Merton is an attractive place for investment with its beautiful places, green settings and excellent public transport connections. We recognise, however, that there is limited land in the borough to accommodate this growth and so there is a need to use land more efficiently, to deliver the aims of this plan”.*

It is further noted that the Council:

*“will promote the most efficient use of land and buildings whilst also seeking to improve the quality of our environment, protect the amenity of occupiers, neighbours and meet planning aims. It is important that development delivers not only homes, but also employment space together with the services and facilities that are needed to support the development and create healthy and sustainable communities where nobody gets left behind and everyone has a chance to succeed”.*

We note that the above must be set within the context of planning policy set out at the national level within the NPPF, which sets out at paragraph 117 that:

*“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”.*

Paragraph 118(c) of the NPPF goes on to set out that planning policies and decisions should:

*“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs”.*

Part (d) further notes that planning policies and decisions should:

*“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”.*

We agree with the principles set out within the Good Growth Strategy in respect of the recognition that proposals for redevelopment should focus on the efficient delivery of appropriate sites. We recommend that this translates into specific policies seeking a ‘brownfield first approach’ for redevelopment proposals within the borough, including where existing buildings and uses are identified as being surplus to requirements in their existing form and function.

The Good Growth Strategy goes on to set out that:

*“The Council will encourage high quality developments with higher densities, where appropriate. We will deliver more homes that can appropriately be delivered by the efficient use of land and buildings, particularly in neighbourhoods with good accessible public transport...Taller buildings are one form of high-density development that can be right in some locations, subject to excellent design, good public transport accessibility and consideration of the impact on the surrounding area”.*

This sits within the context of paragraph 123 of the NPPF which sets out that:

*“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal potential of each site”.*

Part (c) of the paragraph sets out that:

*“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework”.*

The optimisation of development on suitable sites is a key issue in Merton and across London generally, and we are pleased to see recognition of this within the Good Growth Strategy. We recommend that the new Local Plan includes specific policies requiring the optimisation of development on suitable sites and make it clear that where this is not demonstrated, having regard to all relevant policy considerations, applications should be refused.

The Good Growth Strategy goes on to identify the broad locations of Merton’s growth area as the Wimbledon / Colliers Wood / South Wimbledon Opportunity Area and Morden town centre. Whilst we do not disagree with the principles of this strategy, we note that it is later set out that *“development will still take place outside of the OA and Morden town centre, although not at the same scale. Outside the growth areas smaller scale development and more incremental change will take place”*. We consider that this approach could be used by objectors to frustrate optimisation proposals which could unnecessarily undermine the development of suitable development sites outside of the identified broad growth locations. We therefore recommend that any policy setting out this strategy also specifically refers to similar principles applying the suitable sites for redevelopment outside of the identified growth area.

### **Raynes Park**

One of the identified objectives for Raynes Park is to complement the town centre through the creation of a *“complementary offer at Shannon Corner where new residents can boost spending power in Raynes Park town centre and new businesses can benefit from the proximity to the strategic road network”*.

Paragraph 3.4.7 further notes that *“Raynes Park’s share of Merton’s new homes will be provided on some larger sites closer to Shannon Corner and incremental residential development within surrounding neighbourhoods”*.

We agree with this, and would stress that as per the accompanying sketch scheme proposal prepared by ECE Architects, it is considered that Shannon Corner Retail Park itself has the potential for delivery of residential units.

Paragraph 3.4.10 goes on to state that:

*“The changing nature of consumer behaviour has reduced the demand for retail sheds and the council does not support further significant out-of-centre retail development at Shannon Corner. Many of these large sites will be suitable for new homes where these are sensitively designed to improve the setting and public realm, improve*

*links to the town centre and transport hubs and mitigate the impacts of flood risk, poor air quality and traffic noise and provide the necessary infrastructure to support new homes”.*

We wholly agree with the above. The accompanying sketch scheme is not intended to set out precise detail as to how the redevelopment of the Site would address all key issues, but it does give consideration to impacts of flood risk and air quality. It is clearly demonstrated that the Site could deliver suitable and quality residential accommodation taking into account these constraints.

We note that the Site is not afforded a specific allocation within the Stage 2a documentation. We recommend that this is amended in the next round of the Local Plan through a site specific allocation for residential and commercial uses reflecting the sketch scheme prepared by ECE Architects. This approach would reflect the principles set out above which refer to the development of residential accommodation at Shannon Corner. This all provides sufficient assurance over deliverability that could be further developed through the Plan making process.

### **Places and spaces in a growing borough**

It is noted in respect of tall buildings – defined as buildings over six storeys in height and also substantially taller than their surroundings and causing a significant change to the skyline – that such proposals will be permitted only within Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre area, where they are sized and appropriately located in accordance with a number of criteria, including, inter alia:

- Where the ground and first floors are designed for a human scale and maximise the amount of active frontage and natural surveillance;
- Where they are of exceptional design and architectural quality;
- Where they are designed to mitigate against the wind effects that can be created by tall buildings, and demonstrate they do so;
- Where they demonstrate that they do not undermine local character and heritage assets; and
- Where they include high quality and useable public open space, appropriate in size and location to the building and its site characteristics.

Paragraph 5.1.12 further states that *“Tall buildings are not generally a characteristic of Merton. In line with the area-based policies in Chapter 3 of the Plan, tall buildings may be acceptable in the town centres of Wimbledon, Morden and Colliers Wood where they are sited and designed in accordance with a detailed townscape strategy and accord with the policies in this Plan”.*

We do not consider that precluding the development of tall buildings outside of town centres is appropriate *per se*. The Publication London Plan requires Councils to prescribe, based on a criteria based assessment, where appropriate locations for tall buildings could exist. This work should be undertaken so as not to rule out opportunities for taller buildings that in turn could ensure optimisation of sites.

### **Housing Provision**

Draft Policy H4.2 refers to Housing Provision and states that the Council will aim to deliver 13,263 additional homes for the period 2020/21 – 2034/35 (this equates to 884.2 per annum).

It is noted that housing delivery will be achieved by, inter alia:

- Working with housing providers to optimise housing;
- Supporting the provision of well-designed new homes that create socially mixed and sustainable neighbourhoods; and
- Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 and Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL); and the capacity and provision of supporting infrastructure.

Paragraph 4.2.2 sets out that *"Merton's current housing target is 411 homes per annum set out in the London Plan 2016. This is based on a detailed analysis of land availability and capacity across London that Merton worked with the GLA and all other London boroughs. The Intend to Publish London Plan as amended by the Inspector's Examination in Public report, increases the Council's target to 9,180 homes over ten years, averaged at 918 homes per year, which is a 223% increase over the current target"*.

This reflects the context for the submission of these representations, as set out at the outset of this letter. As above, we also note that the Government's statement in December 2020 gives rise to a figure of 2,051 homes per annum for Merton exacerbating the need for even more homes.

On this basis, we repeat our assertion that housing need will be a key issue for the borough and for London more widely in the coming years. Identifying as many suitable residential sites as possible will be key to responding to this situation.

Draft Policy H4.3 sets out the targeted housing mix as follows:

- 33% 1 bedroom units;
- 33% 2 bedroom units; and
- 34% 3 bedroom units.

Paragraph 4.3.14 goes on to set out that *"The borough level housing mix proportions will be applied having regard to relevant factors including individual site circumstances, site location, identified local needs, economics of provision such as financial viability and other planning contributions. Where a developer considers a site unsuitable to apply the borough level housing mix set out in Policy H4.3 the developer will be responsible for demonstrating why this is the case"*.

It should be noted that while the accompanying sketch scheme sets out a proposed unit mix of 47% 1 bedroom units, 40% 2 bedroom units and 13% 3 bedroom units, this mix is not fixed. Rather, it is intended to give an indication of what could be delivered on the Site, recognising its greater suitability as a site for smaller units than for family sized housing. We recognise the need for unit mix to be considered on a site by site basis and this is a matter of detail that would come forward through more detailed design.

## **Conclusion and Closing**

In conclusion, we support many of the principles within the Stage 2a document. We would, however, recommend further examination of the issue of housing need across the borough, and the identification of suitable sites for residential

development is required to meet this need. Our contention is that Shannon Corner Retail Park is one such site, with the ability to come forward for residential development towards the end of the Plan period. As such we would advocate allocation of this site for mixed use redevelopment in the next iteration of the plan.

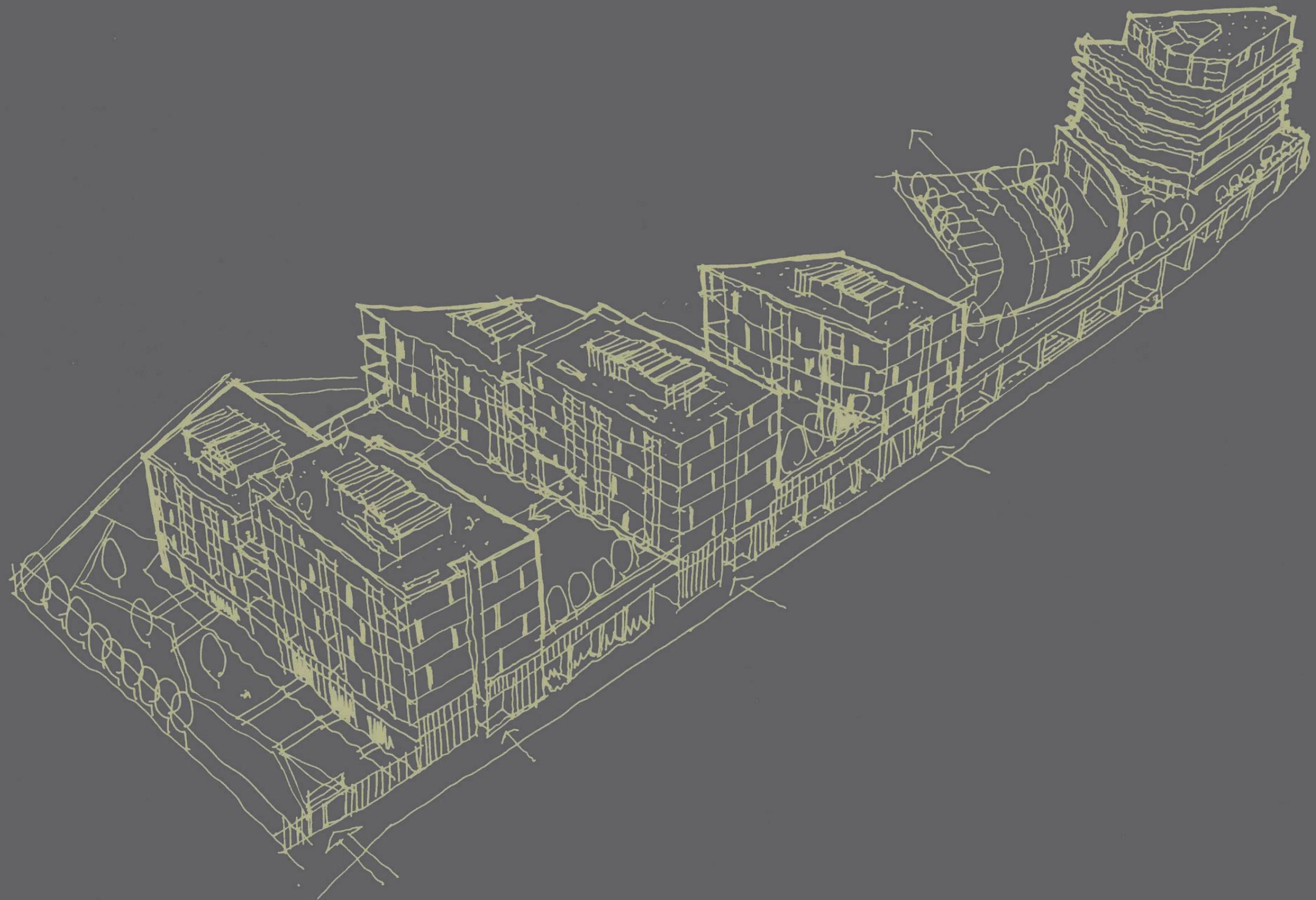
We would be pleased to further discuss this with the LPA and wish to engage with the Council further in respect of the development of the new Local Plan.

Please contact Will Edmonds (07818 012 410 / [will.edmonds@montagu-evans.co.uk](mailto:will.edmonds@montagu-evans.co.uk)) at this office if you have any queries or if you would like to discuss.

Yours faithfully,



**Montagu Evans LLP**



# SHANNON CORNER RETAIL PARK, NEW MALDEN

## D.01 - CAPACITY STUDY DOCUMENT

ECE Architecture

# ECE Architecture

Brooklyn Chambers  
11 Goring Road  
Worthing  
West Sussex  
BN12 4AP

76 Great Suffolk Street  
London  
SE1 0BL

Colston Tower  
Colston Street  
Bristol  
BS1 4XE

Telephone  
Sussex 01903 248 777  
London 0207 928 2773  
Bristol 0117 214 1101

[sussex@eearchitecture.com](mailto:sussex@eearchitecture.com)

[www.eearchitecture.com](http://www.eearchitecture.com)

## Revisions

Revision	Notes	Issue Date	By	Checked By
-	Draft Issue	19.01.2021	GG	MG
P1	Capacity Study Issue	28.01.2021	GG	MG

# 0.0 INTRODUCTION

## 1.01 Introduction

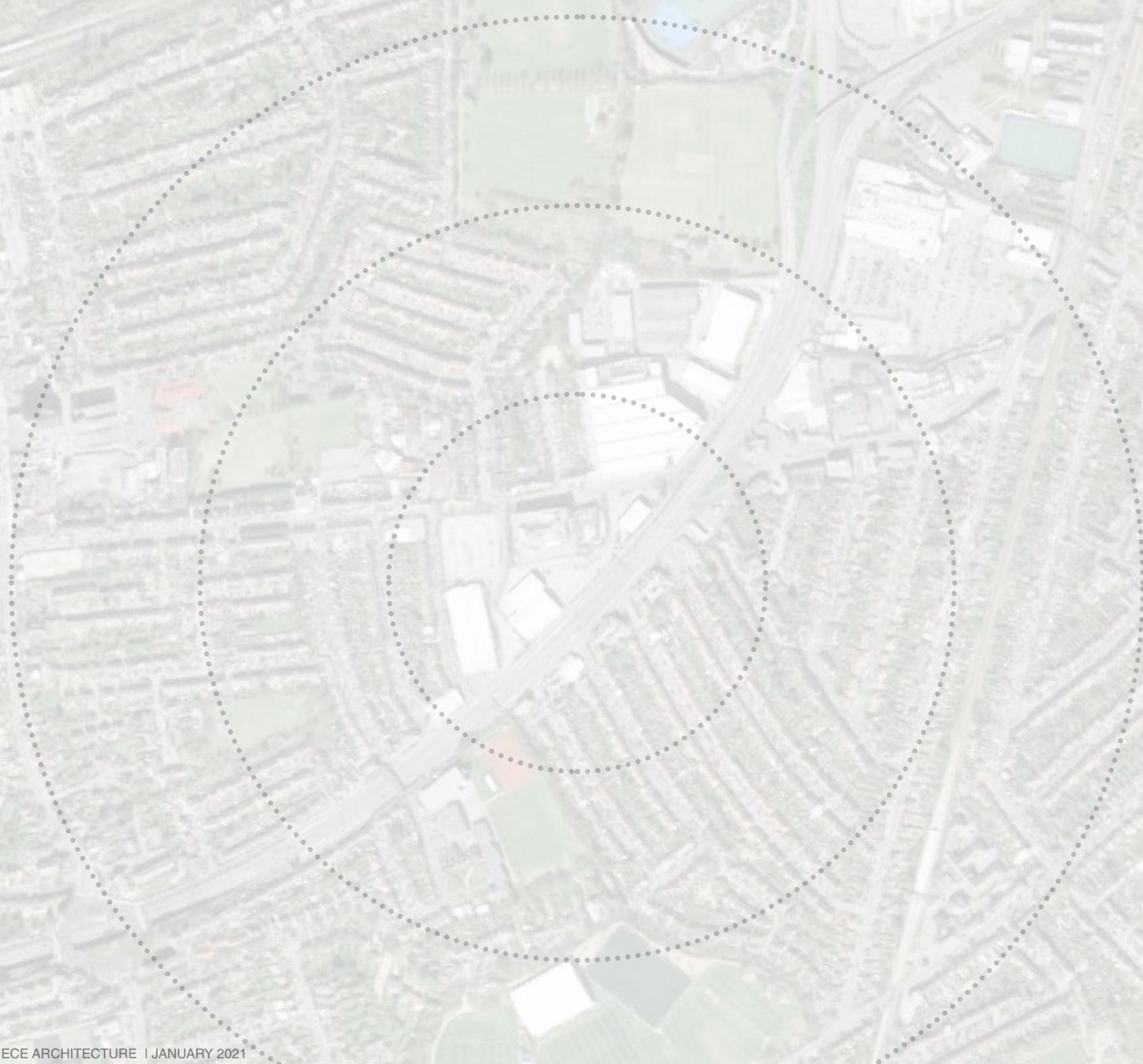
This Capacity Study Document has been prepared by ECE Architecture in conjunction with Montague Evans on behalf of CBRE Global Investments.

The report sets out the key considerations undertaken to develop the Land at Shannon Corner Retail Park, New Malden. It forms part of the representations submitted for the emerging Merton Local Plan, to promote the above site as being suitable for residential/mixed-use development.

## Contents

<b>0.0 Introduction</b>	<b>3</b>
0.01 Introduction	3
<b>1.0 Site Context</b>	<b>4</b>
1.01 Location Plan	5
1.02 Travel Connections	6
1.03 Local Amenities	7
1.04 Typology Context	8
1.05 Building Heights	9
1.06 Urban Grain	10
1.07 Legibility	11
<b>2.0 Proposal</b>	<b>12</b>
2.01 Site Considerations and Opportunities	13
2.02 Indicative Site Plan	14
2.03 Indicative Floor Plans and Accommodation Schedule	15
2.04 Indicative Sketch View	16

# 1.0 SITE AND CONTEXT



# 1.01 LOCATION PLAN

## Site Location

The site is located in New Malden, South-West London. New Malden is located in the borough of Kingston upon the Thames, and the London Borough of Merton.

Old Malden is to the south of the site, Kingston upon Thames to the north-west and Wimbledon to the north-east.

The site is currently known as Shannon Corner Retail Park and consists of a Carpet Right, DFS and Harveys retail stores.

The site is adjacent to the A3 on the southern boundary, Malden Fire Station and Northrop Grumman offices to the north, B&Q New Malden to the north-east and Currys PC World to the west.

The adjacent map indicates other key buildings and features close to the proposed site.



# 1.02 TRAVEL CONNECTIONS

## Travel Connections

The site has good transport links with the A3 providing access to Kingston Vale and into Central London, with Kingston upon Thames only 10 minutes drive to the west.

Multiple bus routes enhance the connectivity of the site with bus stops within walking distance from the site as highlighted in the adjacent diagram.

New Malden and Motspur Park train stations are also within walking distance from the site which provides additional connections locally and nationally through the railway network.

The proposal site is ideally located as a sustainable location for residential development.



# 1.03 LOCAL AMENITIES

## Local Amenities

There is a variety of local amenities within walking distance from the proposed site.

This encourages the use of greener forms of transport to access these locations and helps to promote sustainable living for new residents.

Amenities and leisure include a golf centre, tennis centres, superstores, parks and playing fields, as well as a local high street with restaurant and shops all within walking distance of the site.



# 1.04 TYPOLOGY CONTEXT

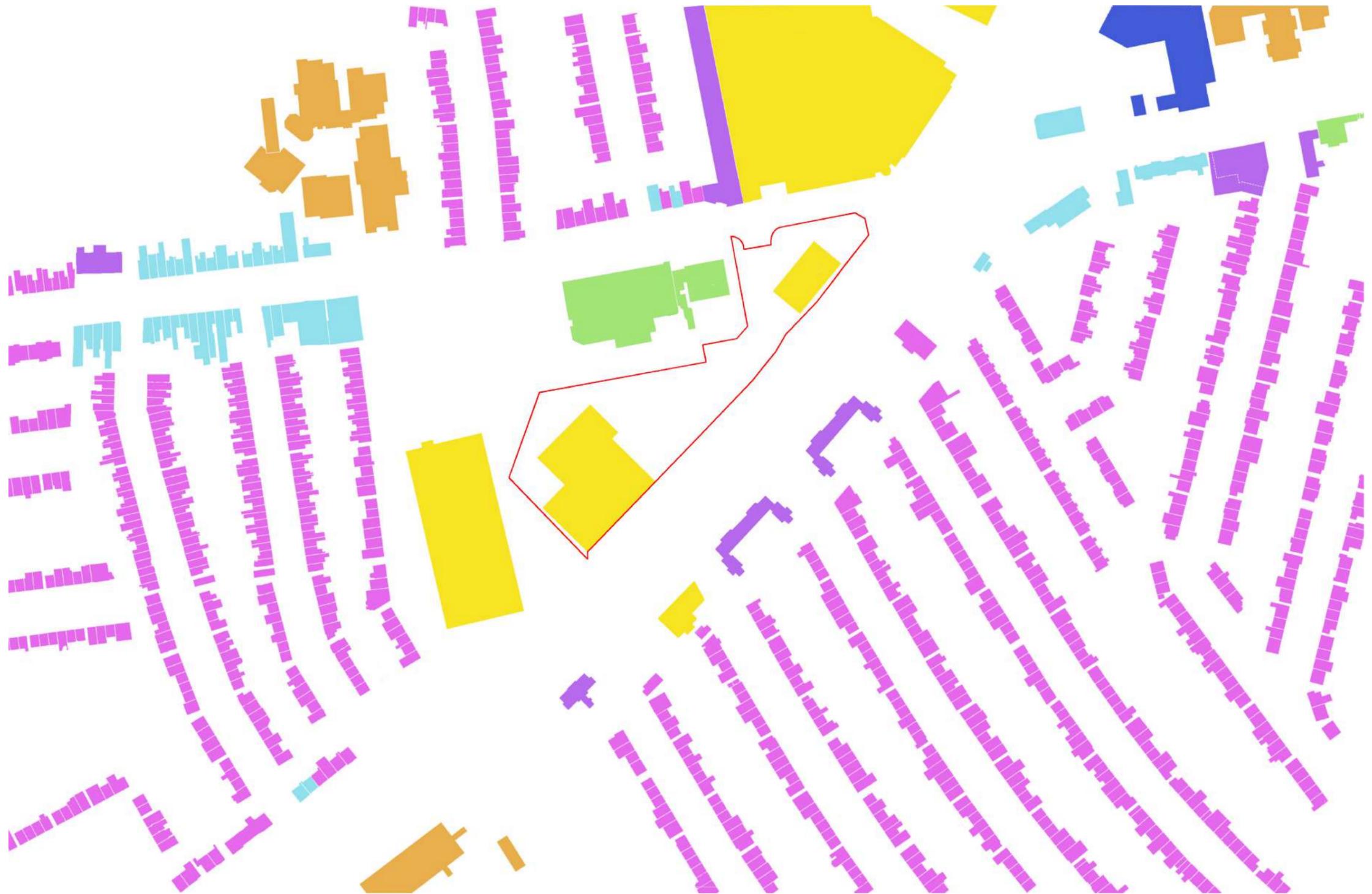


## Surrounding Uses

The immediate site context consists of mainly retail/commercial uses with smaller pockets of educational and office use nearby.

Further to the north, west and south of the site there are clearly defined linear streets of residential development.

The sites location and surrounding uses demonstrate that this site would be ideal for a new sustainable mixed-use community in the heart of New Malden.



### Diagram Key:

- Residential Apartments/Estates
- Residential Houses
- Education
- Commercial/Retail
- Industrial/Wholesale
- Offices / Fire Station
- Large Format/Retail Warehouse

# 1.05 BUILDING HEIGHTS



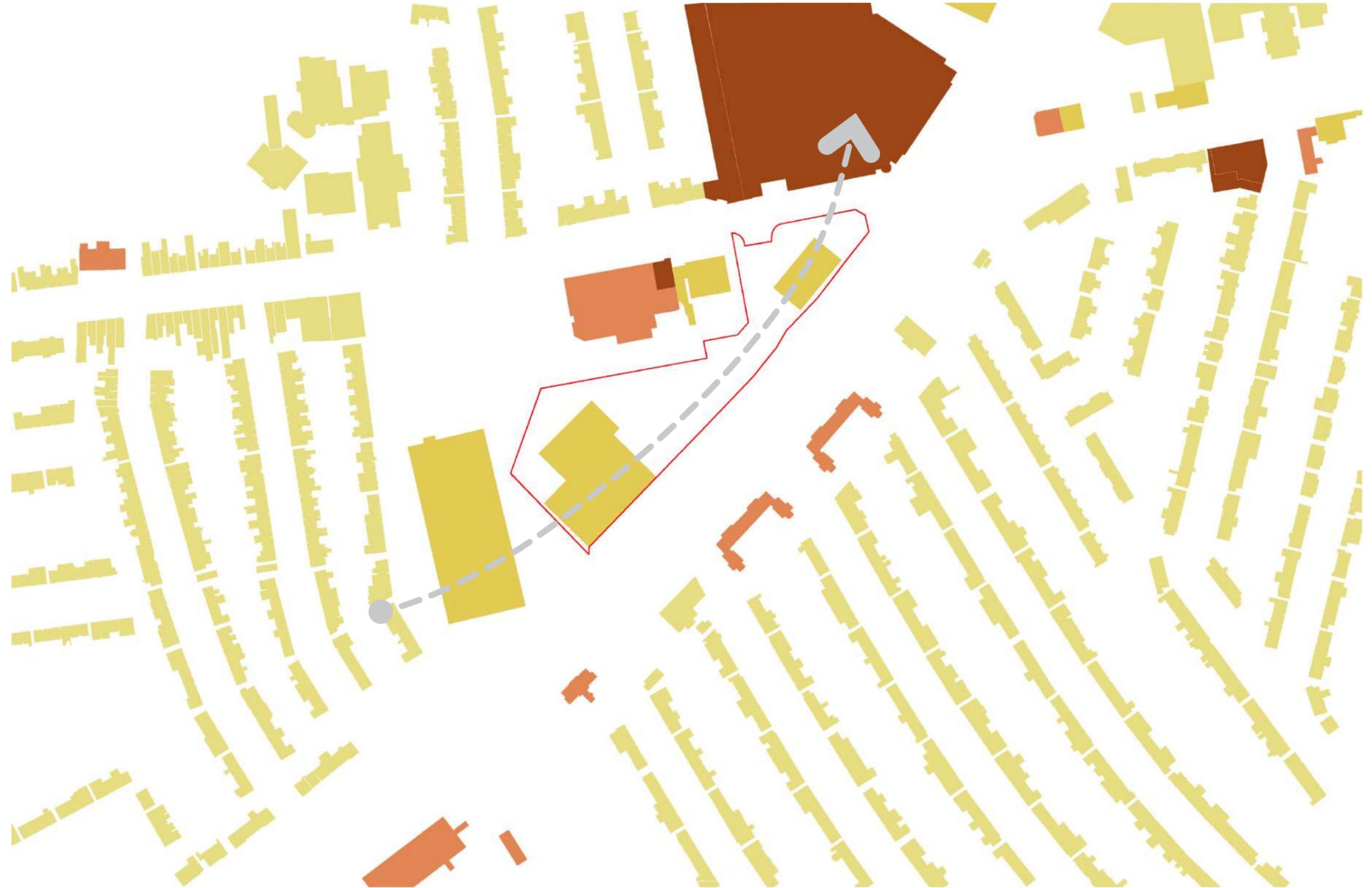
## Building Heights

The heights surrounding the site comprise a 3 storey commercial unit to the west with 4 and 5 storey commercial unit to the north and north-east.

This provides an opportunity to develop a proposal for the site with heights rising from the south-west to the north-east.

Additionally, there is an opportunity to provide height on the site against the A3 and the 4 storey development to the south of the A3, dropping down to address the building heights on the northern boundary of the Shannon Retail site.

There is also an opportunity to create a focal building of height on the junction/roundabout at Burlington Road and Beverley Way with the intension of creating a gateway building for the development.



### Diagram Key:

- Generally 5 storeys
- Generally 4 storeys
- Generally 3 storeys
- Generally 2 storeys

# 1.06 URBAN GRAIN

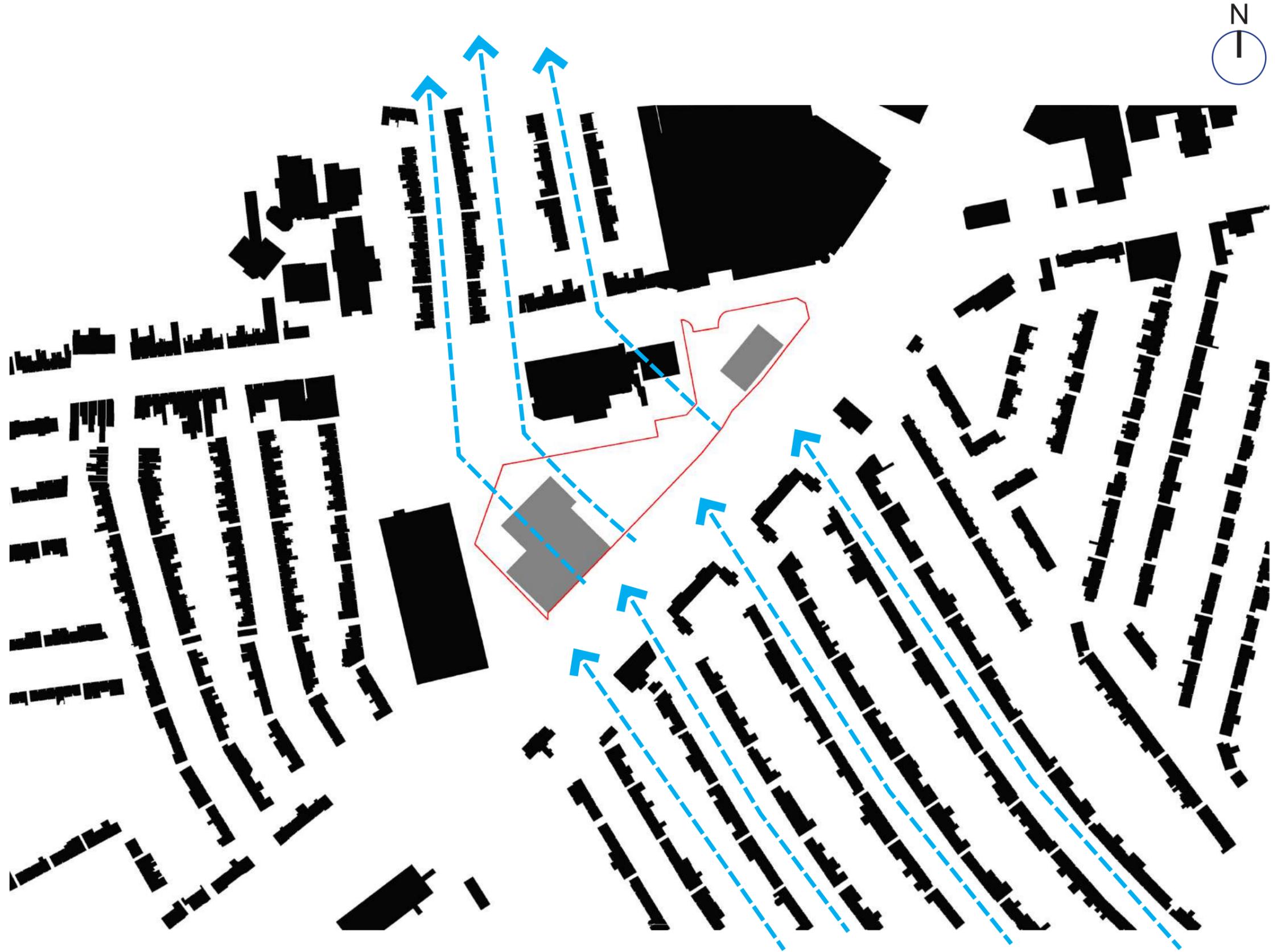
## Urban Grain

The built form in the locality is characterised by smaller secondary residential forms, leading to a larger building footprint near to and within the site.

This suggests the potential for larger volumes of housing on the proposed site in the form of apartment blocks helping to link the residential and commercial areas with appropriate mass and scale.

The local residential urban grain indicates a south-east to north-west direction.

There is therefore an opportunity to connect the grain through the site with potential fingers of development with a similar orientation.



# 1.07 SITE LEGIBILITY



## Site Legibility

The proposed site is partially screened by the elevated A3 to the southern boundary, with secondary pedestrian, cycle and road networks around the site.

The elevated A3 and the mixed-use proposal for the site could develop a proposal with 2 storeys commercial space and ground floor parking with residential and amenity above.

This would elevate the residential development above the road and take advantage of views into and out of the site.

With the correct orientation of the residential units, the constraints of the A3 could be mitigated and provide the development with feature gables addressing the A3 and the key viewing corridors from the south.



### Diagram Key:

-  Key Routes
-  Key Views
-  Keynote Buildings Terminating Local Views

# 2.0 PROPOSAL

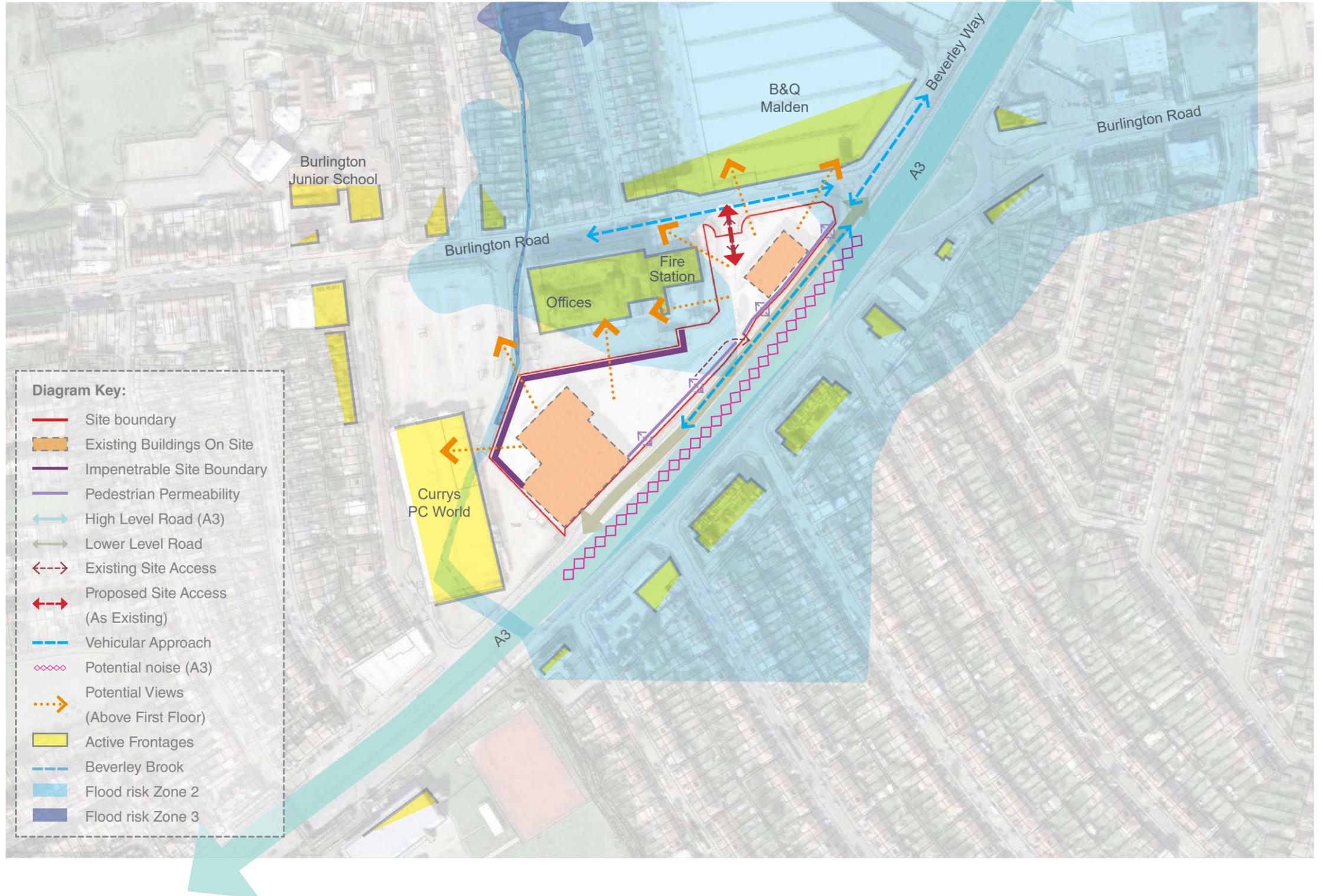
# 2.01 SITE CONSIDERATIONS AND OPPORTUNITIES



## Key Considerations

The sketch proposal carefully considered the following key points:

- Noise from the A3 – Potential acoustic upgrades and winter gardens to flats facing the road and/or orientated to face away from the road.
- One safe access into the site from Burlington Road. Existing secondary one-way access to be removed, not suitable for residential use.
- Improving the pedestrian route to the southern boundary with perforated development and potential access points for residents and commercial frontage to the north-east corner.
- The site is partially in flood risk zone 2 with some limited area in zone 3 by Beverly Brook. All residential accommodation is proposed above the ground floor with only commercial use on the ground floor. FRA will be required.
- Development to respond to existing building frontages and the A3.
- Building lines to move away from north and western boundary to prevent stifling any future development of the surrounding areas.
- Proposal to be orientated appropriately to maximise views away from the A3.



## 2.02 INDICATIVE SITE PLAN

### Indicative Site Layout

The sketch site layout was developed with the following key principles:

- Main vehicular access to the site from Burlington Road.
- All car parking, deliveries, refuse collection and emergency at ground floor level.
- Provide a safe and compliant vehicle turning head in a suitable location.
- Access to the residential stair cores, ancillary spaces, refuse stores, cycles stores and plant rooms at ground floor level.
- Commercial/retail spaces to the north-east corner to be double-height with mezzanines.
- Commercial spaces to the southern end of the site to be live-work units accessing a landscape buffer on the south-west boundary edge.
- North Block to be 8 storeys in height with recessed footprints on the 7th and 8th floors.

#### Site Plan Key:

- Commercial Units
- Cores and Plant Rooms
- Bins and Cycles Stores
- Circulation
- Shared Public Amenity



# 2.03 INDICATIVE FLOOR PLANS AND ACCOMMODATION SCHEDULE



Fifth Floor

Typical Floors  
(2nd and 3rd)

First Floor



### Accommodation Schedule

Floors	Commercial	1 Bedroom	2 Bedroom	2 Bedroom
LGF	1,005m <sup>2</sup>	0	0	0
UGF	308m <sup>2</sup>	0	0	0
<b>Total</b>	<b>1,313m<sup>2</sup></b>	<b>0</b>	<b>0</b>	<b>0</b>

1	0	15	14	4
2	0	17	16	5
3	0	17	16	5
4	0	15	10	3
5	0	13	8	2
6	0	3	4	2
7	0	3	2	1
8	0	3	2	1
<b>Total Number of Residential Units: 181</b>				

### Car Parking Provision:

**Total: 181 Spaces**

Commercial:

26 spaces

Residential (0.85 ratio):

155 spaces

### Floor Plan Key:

- 1 Bedroom Apartment
- 2 Bedroom Apartment
- 3 Bedroom Apartment
- Circulation
- Lifts/Stair Cores
- Balconies

# 2.04 INDICATIVE SKETCH VIEW



## ECE Architecture

**London Office** 76 Great Suffolk Street, London SE1 0BL T 0207 928 2773

**Sussex Office** Brooklyn Chambers, 11 Goring Road, Worthing BN12 4AP T 01903 248 777

**Bristol Office** Colston Tower, Colston Street, Bristol BS1 4XE T 0117 214 1101

[www.ecearchitecture.com](http://www.ecearchitecture.com)

