

20<sup>th</sup> December 2018

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Dear Sirs

## **LOCAL PLAN 2020**

On behalf of our client, Centrica Combined Common Investment Fund and Appley Properties, we hereby submit comments to the draft Local Plan that has been published for ‘Stage 2’ consultation until 6<sup>th</sup> January 2019.

Our client owns an important site within Mitcham town centre and has been discussing the regeneration of the site with the officers at the Council. The site comprises a number of retail properties fronting Majestic Way and also includes the Morrison’s foodstore and a public multi-storey car park.

As such, our client is particularly interested in the objectives and policies of the draft Local Plan that inform the future regeneration of Mitcham town centre for a mix of uses.

The comments to the draft Local Plan are set out in the order of the chapters in the document.

## **CHAPTER 2: THE VISION AND STRATEGIC SITE OBJECTIVES**

### **Strategic Objective 6: Economy**

Our client supports the objective that Merton’s town centres, including Mitcham town centre are attractive and accessible to local residents and workers.

## **CHAPTER 3: OUR PLACES**

### **Policy N3.2 Mitcham Town Centre**

The draft policy refers to the objective to *“improve the overall environment of Mitcham town centre by providing quality shopfronts, new homes, good transport links.”* Our client strongly supports this objective.

The Policy advises that this will be achieved by, inter alia;

“a. Increasing the footfall and spend in the town centre, improving the quality of shops and services;



c. *Make Mitcham town centre easier to walk around and easier to get to by walking, cycling and public transport, requiring new developments and new public realm investment to help create an easier, more legible, coherent, layout of streets and spaces, removing barriers.*

d. *Improving the quality and mix of all tenures, in particular supporting homes above shops in the town centre;*

e. *Supporting businesses, leisure, community and retail outlets that are attractive to and used by the whole community.”*

Our client supports the above objectives set out to improve Mitcham town centre.

### **Site Mi8 Majestic Way, 1 to 12**

As stated above, this is a key site located within the heart of Mitcham town centre, owned by our client. Our client strongly supports the identification of the site as an allocation for a mix of uses in the Local Plan. As such, the site allocation for this site should be retained in the Local Plan.

The Council’s proposed site allocation is for: *“Mixed use: shops, businesses and community services on the ground floors, residential on upper floors (use classes A1-A4; B1a, D1, D2 and C3).”* Our client fully supports the range of uses proposed for this site – particularly the provision of new homes with retail, business and other town centre uses. In particular, it is supported that public car parking is not envisaged by the Council as part of the future use of this site. That said, if, as part of any scheme for the redevelopment of the site includes the re-provision of the existing foodstore, it is envisaged that the operator may require an element of car parking associated with the store.

Furthermore, it is envisaged in the site allocation that the site provides an opportunity for *“an attractive building could make a really significant contribution to improving the look and feel of the whole town centre and Fair Green.”* This is supported by our client and agrees that a well designed scheme, of high architectural quality should be accommodated on the site to provide a mix of uses. It should be noted that, in order to formulate a high quality designed, viable scheme, any scheme will need to comprise an element of height – potentially in the order of 8+ storeys on some parts of the site will need to be accommodated.

Given this is a town centre site, a mix of uses including high density residential-led development to assist in the regeneration of this important site is considered appropriate. An attractive landmark building, potentially of height, as part of an overall scheme for this site will meet the objectives to regenerate and improve the image of the town centre.

### **Recommendation**

Our client therefore recommends that the proposed site allocation for Site Mi8 is re-worded to include reference to the potential re-provision of the existing food store and associated car parking on the site, as follows:

*“Mixed use: shops, businesses and community services on the ground floors, (**which could include a foodstore with associated customer car parking**), residential on upper floors (use classes A1-A4; B1a, D1, D2 and C3).”* [suggested changes to the wording of the policy shown in bold].

### **Site Mi12 Sibthorpe Road Car Park**

This site is located to the west of Site Mi8 discussed above. The site comprises surface level car parking and is allocated for town centre type uses and residential use. It is noted in the allocation that



*“the potential loss or relocation of town centre car parking spaces will need to be considered in line with other site proposals at Raleigh Gardens and Majestic Way.”*

Our client agrees that this site could accommodate a mix of residential and town centre uses. Clearly, the impact of the existing loss of town centre car parking from this site will need to be assessed and would need to be re-provided as part of any scheme for the redevelopment of this site.

### ***Recommendation***

As such, our client considers that the proposed site allocation should include reference to the potential for the re-provision of town centre car parking on this site.

## **CHAPTER 4: HOUSING**

### **Strategic Policy LP H4.2: Housing Provision Policy H 4.3 Housing Mix**

It is noted that the Council will support the provision of well-designed new homes to create socially mixed and sustainable neighbourhoods. The draft Plan sets out that Mitcham is proposed to accommodate a range of new homes, including major development sites of Eastfields and Ravensbury estates and other such as Benedicts Wharf.

The ‘Housing Mix’ table under draft Policy H 4.3 sets out the Borough target housing mix proportions. The table identifies the desired mix for “*Low-cost rent (social rent, affordable rent and London Living Rent)*” and “*Borough wide*”. There is no desired mix for market housing and the Council’s position on a target mix for market housing should be clarified.

It should be noted that town centre sites, such as proposed site allocation Mi8 discussed above, are suitable for high density residential uses, which may include a high proportion of smaller sized units. Given the location of sites within the town centre(s), it is not considered that these are suitable for a high proportion of family units, due to the inevitable site constraints of town centre living, above ground floor retail or commercial uses.

As such, the proposed ‘Housing Mix’ set out in Policy H 4.3 should be applied flexibly to take account of individual site locations and characteristics (as recognized at paragraph 4.3.10 of the draft Local Plan).

## **CHAPTER 5: DESIGN**

### **Strategic Policy LP D5.1: Placemaking and Design**

#### Tall Buildings

The draft Policy sets out at criterion f) that “*proposals for tall buildings will be permitted only within town centres in Colliers Wood, Morden and Wimbledon...*” In the draft Local Plan, Wimbledon is a ‘Major Centre’ and ‘District Centres’ include Mitcham, Morden and Colliers Wood.

The policy then sets out a series of criteria for which proposals for tall buildings will need to take account of. The policy also defines a “tall building” as one based on the site’s context and any building that is substantially taller than their surroundings.

It is accepted that tall buildings are generally appropriate within major town and district centres. However, the policy is too restrictive in the specified town and district centres where tall buildings are



considered appropriate. To meet other objectives of the draft Local Plan in terms of meeting housing numbers, providing a mix of uses on town or district centre sites to assist in the regeneration of sites in such locations, all town and district centres should be considered as suitable locations for tall buildings, subject to further assessment, as set out in the emerging policy. It is not appropriate to exclude Mitcham town centre (as part of the district centre) as an area suitable for a tall building.

For example, as set out above, the draft Local Plan allocates a site within Mitcham town centre (Mi8 1-12 Majestic Way) as suitable for a mix of uses to regenerate and assist in the improvements to the town centre. Reaching a satisfactory quantum of floorspace to achieve a deliverable and viable scheme that meets these town centre objectives may require the scheme to include a “tall building.” As such, as plans come forward, a tall building within Mitcham town centre should not be ruled out during the Local Plan process.

### **Recommendation**

For these reasons, our client recommends that criteria f) of Policy LP D5.1 is amended to reflect the possibility that Mitcham town centre could include a tall building as follows:

*“f) Proposals for tall buildings will be permitted only within town centres in Colliers Wood, Morden, **Mitcham** and Wimbledon and only in accordance with the following criteria:*

*i. Be sized and appropriately located within Colliers Wood, Morden, **Mitcham** or Wimbledon town centre boundaries...”* [suggested changes to the wording of the policy shown in bold].

Paragraph 5.1.12 of the draft Local Plan advises 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 draft Plan. Outside the town centres of Wimbledon, Colliers Wood and Morden tall buildings are unlikely to be acceptable.”*

As set out above, the draft Local Plan allocates sites within Mitcham town centre, as part of the area based policies. As such, in addition to the suggested re-wording to the policy set out above, the supporting text to the policy at paragraph 5.1.12 should also be amended as follows:

*“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, **Mitcham** and Colliers Wood where they are sited and designed in accordance with a detailed townscape strategy and accord with the policies in this draft Plan. Outside the town centres of Wimbledon, Colliers Wood, **Mitcham** and Morden tall buildings are unlikely to be acceptable.”* [suggested changes to the wording of the supporting text to the policy shown in bold].

## **CHAPTER 7: ECONOMY**

### **Policy Ec7.1: Economic Development**

Draft Policy Ec7.1 sets out that the Council will seek to ensure that there is an adequate supply of viable and appropriate sites and premises for employment use in locations which minimise the need to travel by private car while meeting the needs of business by:

*i. Directing 'town centre type uses' especially retail, office and leisure development that generate a large number of trips towards the Major Centre (Wimbledon) and District Centres (Mitcham; Morden, and Colliers Wood)...”*



Our client supports the objective that town centre uses should be directed towards town and district centres. As outlined above, draft site allocation Mi8 sets out that a mix of town centre uses at ground floor level would be appropriate.

### **Policy Ec7.2: Employment Areas in Merton**

The draft policy sets out that proposals relating to employment sites will be supported where they provide small, large and major offices in town centres and in areas that are well served by public transport. Our client supports this objective.

### **Policy Ec7.3: Offices in Town Centres**

The draft policy advises that within town centres, the Council protect offices for which there is a need by encouraging the refurbishment / redevelopment of existing vacant offices for office use and b) only supporting proposals for the change of use on upper floors from office floorspace to alternative uses, if it can be demonstrated that there is no demand for the office use – by marketing of the site for a period of 2 ½ years.

Our client recognises the need to provide office use as part of a range of town centre uses. The proposed site allocation Mi8 (1-12 Majestic Way, Mitcham) sets out that offices should be part of the proposed mix of uses for this site. However, due to aspirations of the Council and our client to provide residential use as part of any scheme for the site, this may have an impact on the amount of office space to be provided.

As such, it is important that in the case of allocated sites in the Local Plan, in order to achieve other competing land use policy objectives, the desire to protect existing office floorspace is applied flexibly.

## **CHAPTER 7: TOWN CENTRES**

### **Policy Tc7.6: Location and Scale of Development in Merton’s Town Centres and Neighbourhood Parades**

Our client supports the objective set out in the policy that the Council will support new retail development in town centres, recognising Mitcham as one such location to “*provide a range of unit sizes.*” The draft Local Plan outlines that as a district centre, Mitcham provides shops, services, cafes / restaurants and local businesses to meet the everyday needs of the local community.

The site at 1-11 Majestic Way is identified as being located within the ‘Primary Shopping Frontage’ of Mitcham District Centre.

### **Policy Tc7.7: Protection of Shopping Facilities within Designated Shopping Frontages**

The draft policy sets out the following hierarchy of designated shopping frontages:

- Town Centres (‘Wimbledon’s central shopping frontage),
- ‘Core Shopping Frontages’,
- ‘Secondary Shopping Frontages’,
- ‘Other Shopping Frontages within town centres’ and
- ‘Neighbourhood Parades’



The draft Local Plan sets out that within these locations, the objective is to maintain and improve the overall vitality and viability of Merton's town centres through the change of use of Class A1 retail uses.

However, the policy does not refer to designated shopping frontages that include the '**Primary Shopping Frontages**'. It is therefore unclear where such retail frontages, such as that at 1-11 Majestic Way, Mitcham (within Mitcham District Centre) fit in at the top end of the hierarchy and the extent of the emerging policy restrictions on the extent of the change of use of existing Class A1 uses in such designations.

Accordingly, our client requests that the draft Local Plan Policy Tc7.7 is amended to provide clarification on the change of use of retail units within 'Primary Shopping Frontages.'

We trust that the above comments are helpful and will be taken into consideration in the next stage of the preparation of the Local Plan. If you have any queries, please do not hesitate to contact Julian Shirley at the above address.

Yours faithfully

**DP9 LTD.**