

Call for Sites Survey -*Eskmuir Group Ltd*

As part of Merton's new Local Plan, we are asking residents, community groups, landowners, developers and anyone who has an interest in Merton to suggest potential sites for redevelopment, reuse, or protection.

We would like to know where you think new homes, shops, offices, schools, health centres and other facilities are needed in Merton over the next 15 years.

We won't publish anyone's personal details but we will ask for your contact details in case we need to find out more information about what you are proposing.

If you would prefer not to use SurveyMonkey to tell us about your proposal, please see our website www.merton.gov.uk/localplan which will give a PDF of this questionnaire that you can email to future.merton@merton.gov.uk or post to Future Merton, Merton Civic Centre, London Road, Morden, SM4 5DX.

At the end of the questionnaire there will be an opportunity to upload additional documents to provide us with more information.

1. Please provide the following:

Site address:

Postcode:

2. Please upload a site location plan

(Please attach any documents to your response)

***3. What is the site area (hectares)?**

***4. What is the current use of this site (please let us know what it was last used for if the site is now vacant)?**

Supermarket (Class A1), with ancillary car parking and offices (Class B1(a))

***5. Please tell us your suggested use(s)**

Mixed use, potentially including Classes A1, A2, A3, A4, A5, B1, C1, C3, D1 and D2

6. Relevant planning history (please tick all that are relevant for your site)

- Pre-application advice
- Planning application submitted
- Planning application decision received
- Appeal
- None/not relevant
- Not known

7. Please use the box below to tell us more about any relevant planning history.

The questions below are optional but will help us assess the site's potential.

8. Are there any factors which might help or hinder this site coming forward as you propose? Please tick all that apply.

- Land in other ownership; site must be bought before development can take place
- Current use needs to be relocated
- Physical constraints (e.g. access, trees, other)
- Issues with viability (e.g. lending availability, contamination and other financial implications)
- Restrictive covenant exists
- Please use the box below to tell us more (optional)

See supporting Statement



9. What is the level of developer interest?

- There is a landowner/developer who wants to build the site
- The landowner wants this to happen but is yet to appoint a developer
- I do not know

This is not relevant

Please use the box below to tell us more (optional)



10. Please indicate the approximate timescale for availability

- 0-5 years: short term (up to 2023)
- 6-10 years: medium term (up to 2028)
- 10-15 years: long term (up to 2033)

11. Please tell us any other relevant information



We won't publish anyone's personal details but we will ask for your contact details in case we need to find out more information about what you are proposing. We will not use any of the personal information that you provide for anything other than contacting you about planning for the future of Merton.

Unfortunately we won't be able to accept anonymous submissions.

***12. What are your details?**

Name

Address

Address 2

City/Town

Postal Code

Country

Email Address:

Phone Number:

***13. I am the/a...**

- Owner of (all or part of) the site
- Land agent
- Developer
- Registered social landlord

Planning consultant

Community group

***14. Are submitting a representation on behalf of someone else?**

Yes

No

***15. Please insert the name, address and contact details of the site owners**

Site owner name

Company (If applicable)

Address

Address 2

City/Town

Postal Code

Country

Email Address

Phone Number

16. What is your client's address

Your clients name

Company (If applicable)

Address

Address 2

City/Town

Postal Code

Country

Email Address

Phone Number

***17. Does the site owner(s) support your proposal(s) for the site?**

Yes

No

18. How did you hear about this consultation? Please select one or more

Email

- Letter
- Website
- Newspaper
- Other (please specify)

19. Please tell us if you have any other comments.

Please see supporting Statement
for further information.

20. Please upload any additional documents that you think are relevant.
(Please attach any documents to your response)



London Borough of Merton Local Plan Issues & Options Consultation

Prepared for:

Eskmuir Group

Prepared by:

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1. Introduction

1.1. Introduction

1.1.1. These representations are made by Savills on behalf of Eskmuir Group (“Eskmuir”) to the Issues & Options Consultation for the London Borough of Merton Local Plan. Upon adoption, the Local Plan will replace the existing Core Planning Strategy (July 2011) and Sites and Policies Plan (July 2014) and will form the central document of the development plan used for the determination of planning applications, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

1.1.2. Alongside this Statement, the following documents are also submitted:

- Call for Sites forms; and
- Site location plan.

1.1.3. Eskmuir are the freehold owners of the offices and supermarket located at 8-20 Worple Road & 20-26 St George’s Road, Wimbledon, SW19 4DD (“the site”). The site is positioned between Worple Road and St George’s Road, and comprises a ground floor supermarket with office space and car parking to the upper floors. Given that the site has two frontages the site is known as different addresses and so a site location plan accompanies this submission.

1.1.4. The purpose of Eskmuir’s representations are twofold. The site’s current layout is inefficient and Eskmuir has been looking at ways to rationalise and improve the site layout through appropriate redevelopment. Consequently, the first purpose of these representations is to submit the site as a candidate site suitable for mixed use development, uses which could include, but not be limited to, Classes A1, A2, A3, A4, A5, B1, C1, C3, D1 and D2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) (“the 1987 Order”). The second purpose is to either support or oppose the retail planning designations that the site is subject to in the existing development plan documents of the Core Planning Strategy and Sites and Policies Plan. Specifically, the comments support the Wimbledon Major Centre designation but seek to remove the site from its existing designations within the Primary Shopping Area (“PSA”) and Core Shopping Frontage (“CSF”) principally due to the site’s peripheral location where many of the surrounding frontages are not active or in retail (Class A1) use and that continued designation could prohibit the most effective redevelopment of the site.

1.2. Statement Structure

1.2.1. This Statement is structured as follows:

- **Section 2:** Provides an overview of the site’s location and description;
- **Section 3:** Identifies the planning policy context within the existing Sites and Policies Plan that the site is subject to and are relevant to Eskmuir’s representations;
- **Section 4:** Provides evidence to support the submission as a Candidate Site for allocation for mixed use redevelopment; and

- **Section 5:** Provides commentary relating to support and opposition of various retail designations that the site is subject to in the existing development plan documents of the Core Planning Strategy and Sites and Policies Plan.

2. Site Description

2.1. Site Description

- 2.1.1. The site is located at 8-20 Worple Road & 20-26 St George's Road, Wimbledon, London, SW19 4DD. The site has an area of approximately 0.22ha and is bound to the south by St George's Road, to the north by Worple Road which runs parallel to St George's Road, to the east by the Elys department store and its servicing area, and to the west by the Savanna, Barry House and the vacant former Wimbledon Community Centre (which will be discussed below). The site is centred on grid reference 524631 170626.
- 2.1.2. The site is occupied in its entirety by a single building. The building is at split level, with the part of the building fronting onto Worple Road being four storeys and the part behind this at the St George's Road elevation being a single storey albeit double height. The ground floor is occupied as a supermarket within Class A1 of the 1987 Order. Its entrance and frontage is onto Worple Road whilst the rear half adjacent to St George's Road is used for storage and servicing. The supermarket also utilise space over the basement, first and second floors but only trade from the ground floor. The offices (Class B1(a)) have a separate entrance and are on the first and second floors. There is no link internal between the supermarket and offices. The single storey part of the building on the St George's Road side is used as car parking accessed via a ramp from Worple Road in association with the supermarket.

3. Planning Policy Context

3.1. Development Plan

3.1.1. The current development plan for the London Borough of Merton comprises:

- Core Planning Strategy (July 2011);
- Sites and Policies Plan (July 2014);
- Policies Map (July 2014);
- South London Waste Plan (March 2012); and
- London Plan (March 2016).

3.1.2. Progress is also being made on three Estates Local Plans, but these are still in their relative infancy and are not therefore afforded any weight.

3.1.3. The extract of the Policies Map relating to the site is included in Figure 3.1 below.

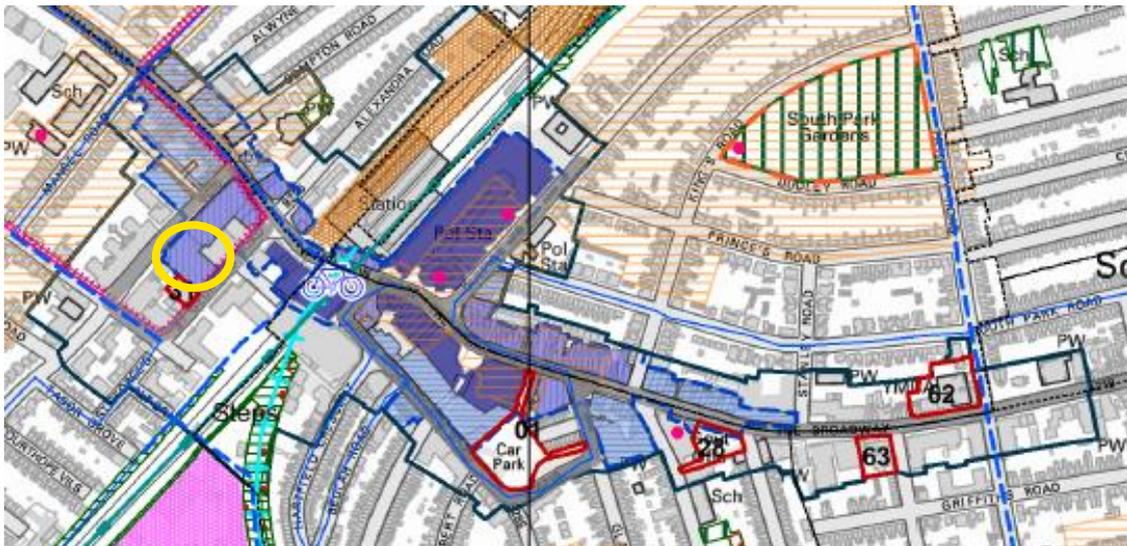


Figure 3.1: Sites and Policies Proposals Map Extract
Source: London Borough of Merton

3.1.4. The approximate location of the site under Eskmuir's ownership is circled in yellow and is currently subject to the following retail designations within the existing development plan documents:

- Wimbledon Major Centre;
- Primary Shopping Area; and
- Core Shopping Frontage.

3.1.5. These are discussed below, along with the adjoining development site of the former Wimbledon Community Centre.

3.2. Wimbledon Major Centre

3.2.1. The site is located within the designated centre of Wimbledon which is identified in Policy 7 (Centres) of the Core Planning Strategy as Merton's only 'Major Centre' (dark blue line) at the top of the hierarchy of centres. Policy 6 (Wimbledon Sub-Area) of the Core Planning Strategy relates specifically to Wimbledon Town Centre, and seeks to focus retail development within the Primary Shopping Area ("PSA"), encourage use of upper floors for offices, support the development of leisure facilities, and ultimately support developments that strengthens Wimbledon's role as a Major Centre.

3.2.2. Reflecting guidance contained within the National Planning Policy Framework ("NPPF") (March 2012), Policy DM R1 (Location and Scale of Development in Merton's Town Centres and Neighbourhood Parades) of the Sites and Policies Plan takes a town centre first approach, seeking to focus a range of uses, those town centre uses defined in the NPPF, within designated centres. Such uses include retail but also leisure, housing, tourism employment opportunities. Conversely, Policy DM R2 (Development of Town Centre Type Uses Outside Town Centres) of the Sites and Policies Plan requires proposals for town centre uses outside of centres to satisfy the retail tests set out in the NPPF.

3.3. Primary Shopping Area and Core Shopping Frontage

3.3.1. Within Wimbledon, the site is located at the very edge of both the PSA (blue hashed line) and a Core Shopping Frontage ("CSF") (light purple shading with vertical grey lines) of the Sites and Policies Plan. Whilst these are two separate designations, in Wimbledon all designated frontages are contained within the PSA and the PSA's boundaries do not extend beyond designated frontages. This was a recommendation made in the Retail and Town Centre Capacity Study 2011 (Nathaniel Lichfield & Partners, August 2011) that informed the preparation of the Sites and Policies Plan. Accordingly, it is appropriate to consider the two in parallel.

3.3.2. There is no specific policy relating to PSAs but policy subtext identifies that such areas should be the focus of Class A uses, and particularly Class A1 uses, within designated centres. Within the PSA, the site is located at the very edge of the Core Shopping Frontage. Within such areas, Policy DM R4 (Protection of Shopping Facilities within Designated Shopping Frontages) of the Sites and Policies Plan requires that changes of use at ground floor from Class A1 to A3, A4, D1 and D2 uses will be acceptable where the site has been marketed for Class A1 use for 12 months, the 50% Class A1 threshold will not be breached, and the proposed use will not detract from the retail function.

3.4. Former Wimbledon Community Centre

3.4.1. No. 28 St Georges Street, which is located to the south of the site on the St George's Road side, is allocated as 'Site Proposal 31' within the Sites and Policies Plan (outlined in red). The Sites and Policies Plan identifies that suitable uses for the site include Class A1, A2, B1, C1, C3 or D1 of the 1987 Order and that, when the Plan was adopted in July 2014, its delivery was anticipated between 2014 and 2019.



- 3.4.2. The site has a total area of 0.06ha. It is currently unused redundant hardstanding contained behind a hoarding following the demolition of the former Wimbledon Community Centre. At the time of the adoption of the Sites and Policies Plan it was under the ownership of the London Borough of Merton.

- 3.4.3. Despite its allocation for a mix of uses since the adoption of the Sites and Policies Plan in 2014, no development has come forward on the site with the only extant planning permission on the site being a permission for the demolition of the community centre and laying out of the site for a 19 no. space surface car park accessed from St George's Road (ref. 13/P0759).

4. Candidate Site

4.1. Introduction

- 4.1.1. This Statement is submitted alongside the requisite 'Call for Sites' forms. As identified in the submission forms, given the nature and size of the site, surrounding uses, and its location within the Wimbledon Major Centre, it is deemed that any allocation should provide flexibility for redevelopment for a range and combination of uses.

4.2. Site Description

- 4.2.1. The site has been described in detail in Section 2 of this Statement.

4.3. Opportunity

- 4.3.1. The site is under the sole freehold ownership of Eskmuir, an asset management and investment company with interests across the UK and a track record of investing in and improving their existing assets. Eskmuir identify that the site layout is inefficient given that part of the building is only two storeys in height, there is a lack of a frontage onto St George's Street and that a large amount of space at ground and first floor at the southern part of the building is currently used to facilitate access to the roof car park. Discussions have taken place with the current supermarket occupier who are keen to retain their presence in this location but identify that the site's layout could be improved to enhance their trade.

4.4. Proposed Use & Deliverables

- 4.4.1. This representation submits the site as suitable for a mix of uses, either as a single use across the entirety of the building or as a combination of any number of uses. Reflecting the site's location with the Wimbledon Major Centre, the site is seen as suitable for any of the traditional town centre uses as defined in the NPPF and could be suitable for Classes A1, A2, A3, A4, A5, B1, C1, C3, D1 and D2 of the 1987 Order.
- 4.4.2. Allocation of the site for a mix of uses will enable redevelopment to facilitate a rationalised layout that makes more efficient use of the site and responds to its opportunities.
- 4.4.3. To facilitate use of the roof as a car park for the supermarket, much of the southern part of the building is used to facilitate ramped access and egress from Worple Road to the car park on the roof. As well as resulting in the lower building height on this part of the site, the ramp results in this part of the site being inefficiently used and means that, due to the amount of vehicular movements associated with the car park, the desirability of the office space above this ramp is fairly low. Given that there would likely be a desire to keep a car parking element, any redevelopment could look to relocate the car parking element in a more appropriate location, potentially at ground floor level with the building above.
- 4.4.4. Building heights in this area range from four storeys as per the site, up to six or seven storeys on the south-eastern side of St George's Road and north-western side of Worple Road. This reflects that the site is not within a conservation area and not close to any listed buildings. Accordingly, Eskmuir recognise that any development could look to significantly increase buildings heights across the entirety

of the site, resulting in the delivery of additional and usable floorspace, particularly on the St George's Road side of the building where the building is only two storeys in height.

4.4.5. Eskmuir also identify that the site layout presently only makes use of its frontage onto Worple Road, with its frontage onto St George's Road being closed off to the public and only used for servicing the supermarket. Whilst this part of St George's Road is also used as the servicing area of the Elys department store and is occupied as offices rather than uses that traditionally generate higher levels of footfall, there may be potential to orientate any development on the site to create frontages onto both St George's Road as well as Worple Road, adding interest for passing footfall and likely providing a more attractive appearance onto St George's Road.

4.4.6. Any redevelopment proposals will be subject to detailed design and masterplanning.

4.5. Former Wimbledon Community Centre

4.5.1. As highlighted in Section 2 of this Statement, the site under Eskmuir's ownership is bound to the south by the site of the former Wimbledon Community Centre which is understood to be under the ownership of the London Borough of Merton.

4.5.2. The Wimbledon Community Centre was demolished following the grant of planning permission under reference 13/P0759 but is presently not used for car parking and is instead vacant, becoming overgrown, and enclosed behind hoardings.

4.5.3. It is allocated in the Sites and Policies Plan (Site Proposal 31) for a mixed use development (further indicating the acceptability of mixed uses in this location) but clearly no development has come forward on this site in this time except for the permission of a temporary car park. Whilst there is likely to be a range of underlying factors behind this, one such factor could be that the site's small size prevents delivery of an economically viable development.

4.5.4. Whilst currently under the ownership of the London Borough of Merton, allocation of Eskmuir's site alongside the former Wimbledon Community Centre would create a site with a combined total area of approximately 0.28ha, potentially unlocking more opportunities for redevelopment and masterplanning.

5. Retail Policies

5.1. Introduction

- 5.1.1. This Section of the Statement sets out Eskmuir's position on likely retail designations on the emerging Local Plan. Given that the Sites and Policies Plan was adopted following the publication of the NPPF, rather than proposing wholesale changes to the retail policy structure given that the designations are compliant with Section 2 of the NPPF, it instead identifies the site's relationship to such designations and suggests a series of changes to the current provisions of the Sites and Policies Plan.

5.2. Wimbledon Major Centre

- 5.2.1. Eskmuir support Wimbledon being recognised as Merton's Major Centre at the top of the retail hierarchy and, within this, support the site's continued location within Wimbledon Town Centre within the adopted Sites and Policies Plan.
- 5.2.2. The Retail and Town Centre Capacity Study (Nathaniel Lichfield & Partners, August 2011) that informed the preparation of the Sites and Policies Plan found that Wimbledon had the largest supply of town centre uses and was most sustainably located of all the centres, justifying its location at the top of the hierarchy. It is considered that this position has been maintained and in fact its position is likely to be strengthened in the future with the improved north-south transport links that CrossRail 2 will deliver. Accordingly, its continued position at the top of the retail hierarchy is supported.
- 5.2.3. The site is sustainably located in an area that is highly accessible and characterised by a range of town centre uses and accordingly its continued location within the designated centre would be supported.

5.3. Primary Shopping Area & Core Shopping Frontage

- 5.3.1. As highlighted in Section 2, the site is located within, but at the very fringe of, the PSA and CSF. Eskmuir's stance is that the site should be removed from both of these designations in the emerging Local Plan and that the boundary of the PSA and CSF should instead stop at the end of the active retail shopfront at Elys along both Worple Road and St George's Road, thereby removing servicing areas and dead frontages from the designations. Given that within the Sites and Policies Plan these two designations are inherently interlinked, these will be covered together below.
- 5.3.2. Annex 2 of the NPPF defines PSAs and primary frontages. The PSA is defined as:
- "Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)."*

- 5.3.3. For primary frontages, the NPPF states that:

"Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods."

- 5.3.4. Importantly, these definitions do not suggest that a unit should be included within either a PSA or primary frontage just because they are occupied within Class A1, but only if they are in an area where a concentration of such uses exists.
- 5.3.5. The Retail and Town Centre Capacity Study (Nathaniel Lichfield & Partners, August 2011) informed the preparation of the Sites and Policies Plan. Whilst prepared a number of years ago and before the publication of the NPPF, it is the most recently published retail study for the London Borough of Merton and importantly picks up on the structural changes to the retail sector and town centres following the recession. Paragraph 9.43 recommends that PSA should be included within Wimbledon to concentrate retail uses and that it should be tied around designated frontages.
- 5.3.6. The PSA and CSF stops at, but includes 8-20 Worple Road (currently the supermarket), on the southern side of Worple Road, whilst 1-8 The Pavement and both 15 and 17 Worple Road are within the PSA and a Secondary Shopping Frontage (“SSF”).
- 5.3.7. Replicated below is the GOAD map covering Wimbledon with the site coloured in purple.



Figure 5.1: Wimbledon GOAD Map
Source: Experian

5.3.8. Figure 5.1 shows that Worple Road is located at the north western edge of the designated centre of Wimbledon. The main retail pitch is clearly at Wimbledon Hill Road and The Broadway as well as Queen's Road to the southeast where there is the highest concentration of Class A uses, and particularly Class A1 uses where units tend to be smaller. Worple Road's distance from the central part of the PSA is further magnified by the location of Wimbledon Station and existing car parking facilities which are located to the east of the site and northwest of the central part of the PSA and accordingly it is highly plausible that visitors to Wimbledon arriving by one of these means would move south-eastwards towards the central part of the PSA but not northwards towards Worple Road.

5.3.9. Figure 5.2 below shows the view looking west down Worple Road from Wimbledon Hill Road.



Figure 5.2: Photograph from Junction of Worple Road and Wimbledon Hill Road
Source: Google Streetview

5.3.10. Figure 5.2 shows that there are two distinct parts of Worple Road. The first is the north-eastern part, comprising of 1-8 The Pavement and the Elys Department Store. These units have a strong relationship with Wimbledon Hill Road, Queen's Road and The Broadway, which represent Wimbledon's prime retail pitch. Elys is a prominent corner unit with a large frontage onto Wimbledon Hill Road and, due to it occupying a number of floors, has prominent advertising onto Wimbledon Hill Road above ground floor level. Likewise, units along The Pavement are at a prominent corner location which is particularly visible when coming from the central part of the PSA to the southeast given that the road is very wide in this location. Further interest comes from the historic appearance of these buildings which are locally listed buildings and within the Wimbledon Hill Road Conservation Area.

5.3.11. The second is the south-western part of Worple Road where the site is located. This part of Worple Road appears distinct and separate from Wimbledon Hill Road and visually appears as offices rather than as retail floorspace.

5.3.12. Figure 5.3 and 5.4 below identify the ground floor land use based on a GOAD map surveyed in February 2017. Figure 5.3 is zoomed in on the site whilst Figure 5.4 shows the balance of uses on neighbouring roads. A Class A uses and high street sui-generis uses are shown in blue, Class B uses in orange, Class D uses in green and the site in purple.



Figure 5.3: GOAD Map Extract
Source: Experian, edited by Savills



Figure 5.4: GOAD Map Extract
Source: Experian, edited by Savills

5.3.13. Figures 5.3 and 5.4 shows that the part of Worple Road beyond The Pavement and 16 Worple Road (Elys department store) does not contain a concentration of retail uses and that those retail uses in this location provide specialist services and are not therefore considered to attract significant footfall. Numbers 15, 19, 22 and 24 Worple Road are occupied as offices within Class B1(a) and accordingly the footfall that they generate is typically employees and, depending on the occupiers, visitors. Whilst numbers 17 (The Bathstore), 20 (The Savanna) and 21 (Dreams) Worple Road are occupied within Class A1 the services that they provide are likely to be frequented by either an established and regular custom base or visitors visiting to make a specific purchase rather than being significant generators of footfall themselves. The Virgin Active Gym is likely to be similar to the Class A1 units at 17, 20 and 21 Worple Road, relying on existing custom rather than attracting shoppers from elsewhere within the PSA.

- 5.3.14. Likewise, along St George's Road the predominant use is offices. The southern side of St George's Road offers a range of purpose built office blocks. The northern side of St George's Road, which the site is found, offers active ground floor retail and commercial uses only up to the end of the Ely shopfront. Beyond this, the street frontage comprises back of house and servicing accesses leading to the site of the former Wimbledon Community Centre and further offices beyond.
- 5.3.15. The figures above show that, whilst the use of the ground floor of the site includes a supermarket within Class A1, this part of Worple Street and St George's Road does not contain a concentration of traditional Class A1 retailers and accordingly its removal from both the PSA and a CSF is justified. It is suggested the PSA and CSF cease at the point of the end of Elys active frontage on both Worple Road and St George's Road.
- 5.3.16. Section 3 of this Statement provides the requisite information and a justification for allocation of the site, either by itself or with the adjoining former Wimbledon Community Centre, for mixed use redevelopment in the emerging Local Plan. As highlighted above, the site represents an inefficient use of land and Eskmuir has considered redevelopment to facilitate a more efficient use of land. If the site were to be allocated for a mix of uses, location of the site within the PSA and a CSF could provide an inflexible policy approach that could prevent the most efficient use of land.

5.4. Conclusion

- 5.4.1. This Section of the Statement sets out representations on behalf of Eskmuir in the context of their ownership at 8-20 Worple Road & 20-26 St George's Road. In terms of retail policies, Eskmuir's representation is twofold:
- To support Wimbledon's position at the top of the retail hierarchy and the site's location as a designated centre, being Merton's only Major Centre. Wimbledon clearly has the strongest retail offering and is most sustainably located, whilst the site is located in an area characterised by a range of town centre uses; and
 - To seek to remove the site from its current designation within PSA and CSF in the emerging Local Plan. The justification for this centres on the site's peripheral location, appearance from Wimbledon Hill Road, the lack of a concentration of Class A1 uses nearby and that such a designation could prohibit the most effective redevelopment of the site if allocated for a mix of uses.

