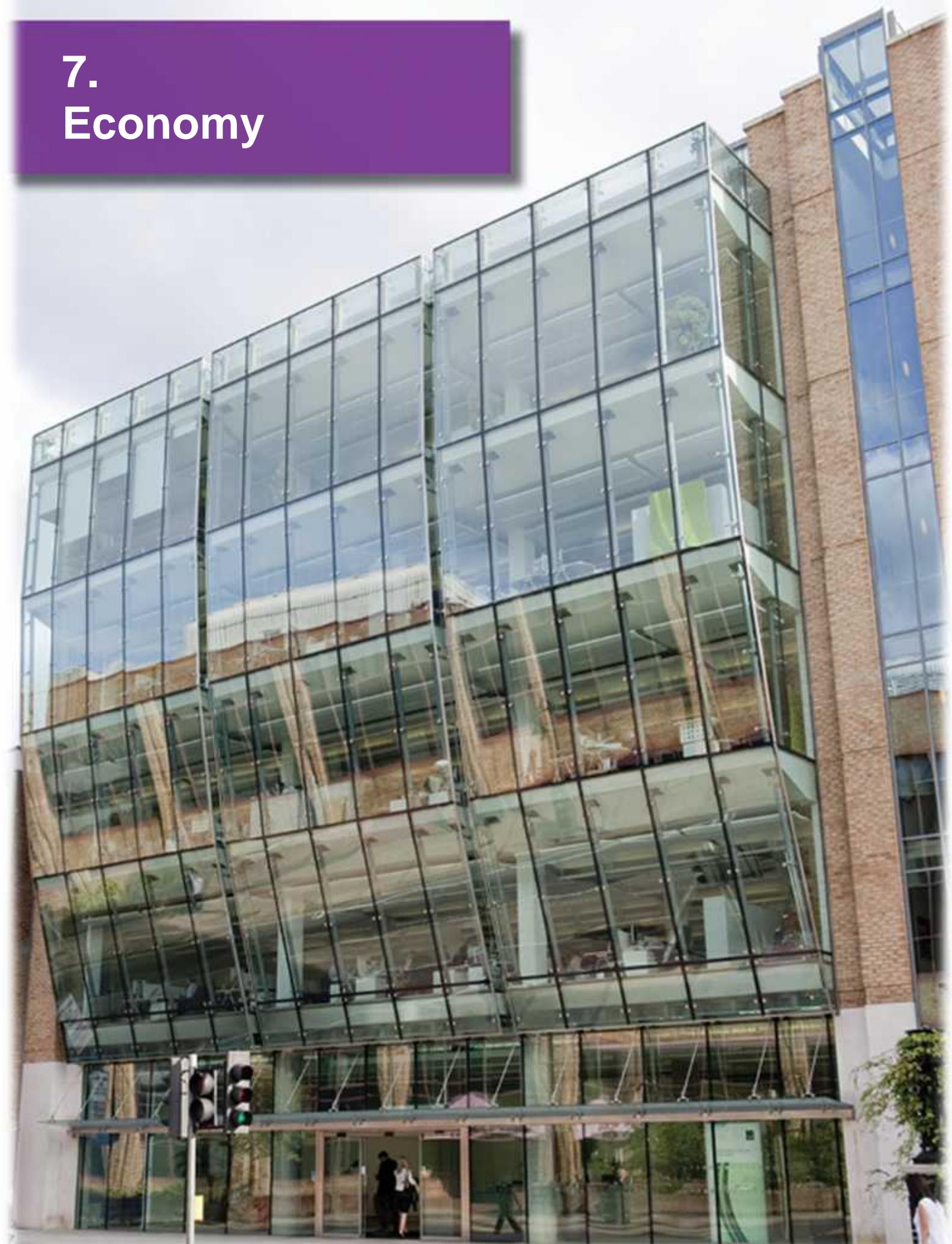


7. Economy



Policy Ec7.1

Economic Development

- a) We will support the development of a diverse local economic base in Merton by encouraging the increased provision of the overall number and range of jobs in Merton particularly in the commercial and business sectors supporting land supply that matches demand (including the provision of social and community infrastructure, industrial and waste services, business, leisure, town centre services and shops, creative, cultural, tech and green sector jobs).

- b) We will encourage and support the provision of sustainable employment in Merton that results in higher levels of productivity, gross values added and, hence, remuneration. We will do this by:
 - i. Providing a presumption in favour of development that raises the number and range of jobs where it meets other policies in this plan;
 - ii. Safeguarding employment and community floorspace and sites for business and jobs
 - iii. Strengthening the pathways through education and learning into jobs and careers for residents;
 - iv. Encouraging employer participation and investment in skills;
 - v. Aligning the skills offer to our growth and strategic sectors through the Skills for South Londoners Strategy and the south London Skills and Employment Board.
 - vi. Requiring developers and applicants on large sites to support the recruitment of local residents and businesses as part of the construction and end life of their development.

- c) We 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
 - ii. development that generate a large number of trips towards the Major Centre
 - iii. (Wimbledon) and District Centres (Mitcham; Morden, and Colliers Wood

- iv. Protecting and managing the designated Strategic Industrial Locations and maintaining and improving our Locally Significant Industrial Sites, ensuring that they are prioritised for business, industrial and distribution functions;
 - v. Facilitating new employment by protecting and improving scattered employment sites for small and growing businesses or community uses;
 - vi. Support well managed co-working space for small and medium enterprise and new start-ups close to good public transport links;
 - vii. Seek to ensure that there is a strong supply of appropriate space for small businesses including move on space
 - viii. Support opportunities to use vacant buildings and land for flexible and temporary meanwhile uses or pop ups.
 - ix. Not support live/work developments
- d) We will encourage complimentary businesses, services and activities in our town centres that will increase and not harm the vitality and vibrancy of the centre including uses that will add to the visitor attraction of the town centre and meet the changing needs and desires of tourists and high street visitors.

Justification

- 7.1.1 The NPPF 2018 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 7.1.2 The Mayor of London's research forecasts that Merton will have 21% additional jobs by 2041, one of the highest increases in south west London (GLA Economics London Labour Market projections 2017) This Local Plan seeks to accommodate these additional jobs and additional space for businesses, jobs, apprenticeships and training in order to boost wages and local employment opportunities within the borough.
- 7.1.3 Merton is characterised by being the gateway between inner and outer south west London. Planning for sustainable economic development in Merton covers all types of businesses, services and jobs from high value financial services through to shops and

other town centre activities, manufacturing, logistics, leisure and culture, public and community uses.

- 7.1.4 One of the council's main aims is to be open for business and invest in our residents quality of life by providing suitable and well-located space for a wide variety of businesses and services that enable residents to work and run businesses locally, reducing the need for excessive commuting.
- 7.1.5 The Local Plan seeks to continue the four core economic objectives:
-) To improve the average levels of productivity, gross value added and hence pay for jobs in Merton;
 -) To build on Merton's strengths in location, attractiveness, brand value and expertise to promote its economy;
 -) To promote economic resilience in Merton through a diverse local economic base which does not rely too heavily on any one sector for its continued success; and,
 -) To ensure that activity is delivered in a way that supports other values and objectives, notably addressing deprivation in the east of the borough and protecting built heritage and the environment.
- 7.1.6 In accordance with draft Policy N3.6 Wimbledon, and based on the London Plan, there will be ongoing demand for modern office floorspace in Wimbledon town centre commensurate with its international reputation, excellent public transport access and high quality surrounds. Smaller offices will be supported in other town centres commensurate with their scale and function.
- 7.1.7 The relationship between numbers of jobs and employment floorspace is not straightforward and is becoming harder to quantify given ongoing advances in technology and changes in working practices. A decline in traditional manufacturing in London is not leading to a permanent reduction in demand for premises, as growth areas such as food production, creative industries, advanced manufacturing, research and development, recycling and waste management, construction, printing and publishing and logistics are utilising such sites. Conversely, the rise in home working and flexible working for office based employees has not led to a downturn in demand for new purpose built office floorspace in Wimbledon; there has been a rise in speculative office development since 2013.
- 7.1.8 Some employment uses do not provide or increase the number of job opportunities in the borough, for instance, storage facilities, particularly self-storage ('B8' use within the Use Class Order). The council wishes to both increase the number of employment opportunities in the borough and will support new business floorspace that provides a

higher number of jobs. Solely storage functions, particularly self-storage, will not be supported.

- 7.1.9 Successive London Plans from 2004 to the current 2017 Draft London Plan have consistently identified Merton as having low levels of industrial land relative to demand and should adopt a more restrictive approach to the transfer of designated industrial sites to non-employment uses. This is common to all south London boroughs.
- 7.1.10 To help support and strengthen the local economy during this time of continued uncertainty and in order to provide the borough with a strong foundation for future business growth, competition and employment, it is our intention to substantially protect and wherever possible, improve the quality of the borough's Strategic Industrial Locations, Locally Significant Industrial Sites and scattered employment sites.
- 7.1.11 However the council wants to support established business sites that can continue to safely accommodate modern business operations in an urban setting without requiring restrictions on opening hours, vehicle movements etc. being placed on the business to protect nearby local amenity. Therefore the council has proposed some amendments to Merton's Strategic Industrial Locations and Locally Significant Industrial Areas which are set out in draft Policy Ec2 to ensure that Merton's SILs and LSISs are fit for purpose.
- 7.1.12 To tackle the loss of scarce business space and reduce the potential for conflict between established business operations and new residents the council has introduced an Article 4 Direction to remove permitted development rights from offices in designated industrial areas and Wimbledon town centre that want to convert into residential use.
- 7.1.13 The rapid changes in consumer behaviour are changing the nature of high streets across England. Large standard-format "big box" retail is proving less viable as consumers shop online with deliveries on the same day or within 24 hours and demand an experience to attract them to visit high streets or town centres. Department stores, clothes stores, electronics and other comparison goods are most at risk from these changes and it seems likely that consumer behaviour will adapt further and faster within the 15-year lifetime of this Local Plan. There is likely to be less demand for standard sized purpose-built premises which attract high rents and business rates but have not been designed to support different types of enterprises or to be subdivided into smaller units. The council will support the redevelopment of purpose built retail units for which there is no demand into other non-residential uses and will encourage new non-residential premises to take reasonable steps in their design to accommodate subdivision or expansion. This approach will be more cost effective in the long run for

the landowner and will create viable space for start-ups and other businesses to grow, flex and change with changing demands and consumer behaviour.

7.1.14 The council is conscious that some of the usual planning tools, including the Use Classes Order, may be too rigid in its categorisation of businesses into very specific uses and that the planning system is not fully equipped to support pop-ups or meanwhile uses.

7.1.15 To create a resilient, safe, diverse and vibrant town centres, high streets and other areas in Merton, we will support opportunities to use vacant buildings and land for flexible and temporary meanwhile uses or pop ups. The use of temporary buildings and spaces can help simulate vibrancy, vitality and viability and security by creating social and economic value from vacant properties. Meanwhile uses can also help to prevent blight, reduce the risk of arson, vandalism and anti-social behaviour.

7.1.16 The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment.

7.1.17 The draft London Plan policy HC.4 supports this for culture and creative industries; the council believes that this should be extended more widely to encompass property guardians and any non-residential use.

7.1.18 In considering developments these developments, the council's priorities will be:

-) the enhancement or protection of local amenity in the surrounding area. This includes the vitality and viability of town centres and high streets, the business priorities for established and designated business areas and residential amenity of local neighbourhoods and scattered employment sites;
-) the provision of jobs, with emphasis on the provision of a wide range of salaries and skills and a high number of jobs;
-) Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties

7.1.19 Planning to support well paid jobs that offer career progression and meet the needs of the future employers must be considered to ensure a sustainable economic model. Merton will work with partners, including the London Mayor and the South London Partnership to facilitate stronger links between businesses and education and training providers in South London. We will work together to ensure that the Skills Devolution programme meets the needs of Merton residents. In doing so we will identify skills

needs and gaps, recognise the need to respond to changing work patterns, the rise of technology and the demand for suitable workspace.

7.1.20 Currently healthcare, education and the public sector are major employers of our residents within the borough and beyond its boundaries (for example at St George's and St Helier hospitals). This is expected to continue with the planned increase in housebuilding across London.

7.1.21 It is recognised that artificial intelligence (AI) and the tech sector will generate new types of employment, working patterns and in some cases roles that currently do not exist. We want to enable this policy to support employment growth by providing flexible work space and infrastructure that will facilitate employment space.

7.1.22 Development trends in Merton, as in other urban areas, demonstrate that live/work developments revert quickly to a single use and any retention of the mixed use function is unachievable. This results in a loss of either employment or residential space. On this basis the council does not support live/work developments.

7.1.23 The council will use planning obligations to ensure that job opportunities and apprenticeships are notified to the council or appropriate nominated agencies so that suitable local people can be given the opportunity to fill these vacancies.

Policy Ec 7.2

Employment areas in Merton

Proposals relating to employment sites will be supported where they:

- a) Retain existing employment land and floorspace. The council will support proposals for the redevelopment of vacant and underused existing employment land and floorspace for employment uses (B use classes).
- b) Provide:
 - i. Small, large and major offices and businesses (B1 [a] Use Class) in town centres or in areas with good access to public transport (PTAL 4 and above) and within close proximity to additional services for employees and workers.
 - ii. Small (generally floorspace below 280 sqm) offices and businesses throughout the borough.
- c) Have good access to public transport. Proposals for offices and business should be easily accessible by walking and cycling and wherever possible have facilities such as showers and secure cycle parking to support this. Measures to reduce reliance on car travel such as parking restrictions, travel plans and other appropriate measures will also be required.
- d) Provide research and development (B1 [b] Use Class), light industrial (B1[c] Use Class), general industrial (B2 Use Class) and storage and distribution (B8 Use Class) in Merton's Strategic Industrial Locations and Locally Significant Industrial Sites.
- e) Are well designed. All proposals for developments should:
 - i. Have layout, access, parking, landscaping and facilities that are secure and appropriate to the site and its surroundings;
 - ii. Not unacceptably affect the operation of neighbouring businesses; and,
 - iii. not adversely affect traffic movement, road safety or local amenity.

- e) Provide flexible or co-working space which is well-designed and well-managed to optimise its success for individuals and SMEs. Where flexible working / co-working is proposed in conjunction with a reduction in employment floorspace on the site, the council will seek planning obligations to secure that the flexible working / co-working space would be designed and actively managed for flexible working / co-working for a period of at least two years from the date of opening.

Justification

- 7.2.1 The NPPF, London Plan and Merton's strategic economic development policy seeks to optimise employment opportunities for Merton's residents assisted by supporting new development of business premise and protect employment land. These policies also direct new employment opportunities to the most appropriate and sustainable locations. This policy will contribute towards delivering these policies by setting out how proposals for employment will be considered.
- 7.2.2 Merton's main employment areas are the designated town centres and designated industrial sites (both the Strategic Industrial Locations [SILs] and Locally Significant Industrial Sites [LSIS]) and these are designated on Merton's Policies Map.
- 7.2.3 Merton's town centres are highly suitable for office and business uses (B1 [a] Use Class). Designated industrial areas are suitable for research and development (B1 [b] Use Class), light industrial (B1 [c] Use Class), manufacturing (B2 Use Class) and storage and distribution (B8 Use Class) uses. These locations are considered the most appropriate and sustainable for these uses as they:
-) are highly accessible by different forms of transport;
 -) allow for the expansion of business; and,
 -) allow for similar businesses to locate together and for neighbouring uses to be compatible with each other;
 -) offer alternative complimentary services/uses to town centre visitors;
 -) support the night time and tourist economy

Businesses and offices

7.2.4 The London Plan and Merton's Local Plan support and encourage office development in Wimbledon town centre and forecasts demand for offices, in particular for large and modern floorplate offices.

7.2.5 As Wimbledon town centre is tightly bound by residential areas, including some designated as conservation areas, the possibilities for growth in Wimbledon are for:

-) development on allocated sites;
-) redevelopment or re-occupation of vacant units;
-) increasing density on existing sites; and,
-) expansion of Wimbledon town centre around Wimbledon station, including over the tracks, working with Network Rail and Crossrail2

7.2.6 The council will work with landowners to meet market demand for high quality, well designed offices commensurate with Wimbledon's status as a major centre with metropolitan characteristics and in recognition of Wimbledon's excellent transport links and as an internationally recognized name. Across the borough, smaller offices will be supported in town centres or in areas with good access to public transport (PTAL 3 and above).

7.2.7 As detailed in the draft policy in this plan on *Out-of-centre commercial development*, to strike a balance between Merton's aspirations for economic growth whilst protecting the vitality and viability of Merton's designated town centres, proposals for new large office developments located edge-of-centre and out-of-centre will be required to submit a sequential test and may be required to submit an impact assessment. For the purposes of this policy, small offices are defined as being below 280sqm floorspace.

7.2.8 Public Transport Accessibility Levels (PTAL) informs geographical area levels access to public transport., the higher PTAL levels are concentrated around the town centres and transport interchanges of Wimbledon, Morden, Colliers Wood, Mitcham and Raynes Park. Areas to the south east and south west of the borough have the lowest accessibility levels. As set out in the transport policies, applicants should use the latest and most up to date PTAL calculator from Transport for London

<https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcats>

7.2.9 The council supports co-working and other forms of flexible working space in Merton which can support a greater number of jobs within the same office floorspace. Advice from organisations that have experience in managing co-working office and business space in

London is that its success depends on a number of factors including the location, size, presence of other ancillary facilities and the management / rental structures.

7.2.10 There are many examples of flexible managed co-working spaces in London and an increase in companies (e.g. Central Working, Workspace, Co-working, Techhub) who specialise in providing this space. Managed correctly, these spaces can support a much higher number of jobs and small businesses than more traditional business floorspace. The council wants to ensure that development that proposes co-working to be managed and run effectively so as to genuinely result in the extra jobs density that is cited at the planning application stage.

7.2.11 Flexible working and co-working business spaces are characterised by:

- Providing desks or small workspaces within a fully serviced office that can be used by individuals or SMEs;
- Monthly rents (or less for individuals), making the space more affordable and flexible, rent being inclusive of services;
- The rent is inclusive of other services such as utilities, telecoms, post, meeting spaces etc
- Space for lots of people and businesses to come together, not just one or two, to create a vibrant business community and increase the chances of business collaboration;
- No long leases or large financial commitments required to join;
- Having a range of premise on one site or by having several sites so businesses can grow either by moving to a bigger space within the site or by moving to a flexible working area with larger premises within the same contract
- access to other services (e.g. near a café or with a café on site)
- Having a dedicated, expert company to manage and curate the co-working offer who knows business needs and can tap into the relevant business and SME market and retain jobs, ensuring that they are being advertised and managed to maximise jobs and business retention and satisfaction;
- Being easily accessible for the individuals, businesses and clients they are trying to attract
- Having a successful brand name and image commensurate to the SME / tech / creative / business market that they are trying to attract;

7.2.12 The council wants to ensure that proposals for flexible working are genuine and are successfully delivered in Merton for the benefit of SMEs and other businesses and that the provision of flexible working is not simply being cited at planning application stage to claim a higher jobs density when providing less employment floorspace. Therefore, where flexible working is proposed in conjunction with a reduction in employment floorspace on the site, the council will seek planning obligations to secure that the flexible working / co-working space would be designed with regard to the attributes listed above and be actively managed for flexible working / co-working for a period of at least two years from the date of opening by a flexible working specialist company with a track record in this.

Designated business and industrial sites

7.2.13 Merton and the other boroughs in south London are categorised as ‘restricted transfer of industrial land’ in the London Plan 2016 the draft London Plan 2017 and in all previously published London Plans This is due to the high levels of demand, high occupancy and high rental values of properties and sites located within designated employment sites across south London.

7.2.14 Merton’s Strategic Industrial Locations are recorded on Merton’s policies map and set out below

Strategic Industrial Locations	Size (hectares)	Characteristics
South Wimbledon Business Area	35ha	One of the largest, most occupied strategic industrial locations in south west London with highest rental yields. Wide range of different types of industrial type businesses
Willow Lane	44ha	Large industrial area with focus on heavy industry, recycling and waste management
Durnsford Road / Weir Road	10ha	Range of different businesses
Plough Lane	15ha	Range of businesses
Hallowfield Way / Benedicts Wharf - southern half (amended)	3.2ha	SIL area with frontage to the A24 (west of tram line) being retailed as Strategic Industrial Location. Area with single access off Hallowfield Way proposed for re-allocation.
Prince George’s Road	6ha	Industrial area behind Colliers Wood town centre. Several trade counters
Streatham Road (proposed)	6ha	Purpose built industrial area with good access, purpose built units and main road frontage

- 7.2.15 To allow for businesses to operate without excessive constraints from nearby homes (such as restrictions on opening hours, heavy vehicle movements, noise etc) the council will support proposals for research and development (B1 [b] Use Class), light industrial (B1[c] Use Class), manufacturing (B2 Use Class) and storage and distribution (B8 Use Class) within the designated industrial areas.
- 7.2.16 Logistics and other employment activities that generate frequent vehicle movements to and from the site/premises (excluding retail warehousing or any type of retail activity), will be encouraged to locate within the main industrial areas that are adjacent to the Strategic Road Network and have good vehicular access to the site.
- 7.2.17 In designated industrial areas in Merton, higher density trip-generating developments such as offices (B1 [a] Use Class) can interfere with the operations of surrounding businesses through increased traffic congestion, parking and pedestrian movements. Planning permission will not be granted for the development of offices in the designated industrial areas unless these are ancillary to the principle use of the premises or site.
- 7.2.18 Industrial areas are protected for business use to maintain an environment where businesses can operate alongside other businesses without the same restrictions that would apply if these businesses were to locate in a residential area. Merton has a wide range of key businesses that support jobs and provide services to London's population. These include food production, waste management, and industrial laundrettes serving hotels and hospitals, printers, theatre stage engineering and other activities.
- 7.2.19 What these businesses have in common is the need to operate without the restrictions that would be placed on them in more residential areas. HGV movements, additional noise and smells, early morning starts or 24 hour operations are essential operational requirements for many businesses. The council has implemented an Article 4 Direction to prevent the further conversion of offices to residential within designated industrial areas and Wimbledon town centre via prior approval in order to protect space for business uses. The council will also ensure that established noise-generating businesses (e.g. industrial uses, rail infrastructure) remain viable and can continue or grow without unreasonable restrictions being placed on them, in line with the "Agent of Change" approach in the NPPF 2018 and in draft policy D4 in the Draft London Plan 2016.
- 7.2.20 Proposals for new development or change of use should be compatible with the amenity of neighbouring occupiers of buildings. If proposals are likely to conflict with the successful operation of existing businesses nearby or detrimentally harm the amenities of occupants of neighbouring buildings, planning permission will not be granted. Mitigation measures through

design condition or planning obligations may be sought to improve site access or minimise disruption to neighbouring businesses where necessary

Policy Ec 7.3

Offices in town centres

In Merton's town centres, the council will protect offices for which there is need by:

- a) Encouraging the refurbishment/ redevelopment of existing vacant offices for office use.
- b) Only supporting proposals for the change of use on upper floors, from office floorspace to alternative uses, if it can be demonstrated to the council's satisfaction that there is no demand for the office use. This can be demonstrated by full and proper marketing of the site at reasonable prices for a period of 30 months (2 ½ years).
- c) Ensuring that all proposals would have no significant adverse effects on the amenities of nearby residents, road safety nor create significant car parking problems.

Justification

- 7.3.1 The council seeks to optimise employment opportunities in Merton by supporting the development of offices by directing new office space towards the most appropriate and sustainable locations. This policy will contribute towards delivering these policies by protecting offices for which there is demand.
- 7.3.2 The council aim to increase the borough's capacity for attracting and accommodating a range of jobs in Merton, including offices, to increase employment opportunities and to provide good quality employment in Merton.
- 7.3.3 The Mayor's London Office Review has consistently identified Wimbledon town centre as one of the few outer London locations that are capable of attracting office-based businesses and jobs that might otherwise have premises in central London. This is reflected in planning applications and development activity in Wimbledon to modernise existing offices and provide new speculative offices.
- 7.3.4 This policy proposes to protect offices for which there is need and the council will encourage the redevelopment/ refurbishment of existing vacant offices to modernise the space for businesses.

- 7.3.5 In 2013 the General Permitted Development Order (GPDO) was changed to allow offices to change to other uses including residential and state-funded schools; these planning policies do not apply. To protect space for businesses and jobs, in 2015 the council introduced an Article 4 Direction to remove these permitted development rights for offices in Wimbledon town centre and Merton's designated industrial estates to change to residential.
- 7.3.6 In instances where planning permission is required, proposals for change of use from offices to other uses will be considered, where it can be demonstrated that there is no need for office uses. The applicant will need to demonstrate that:
- The site has been marketed for the time period detailed in policy unless otherwise agreed with the council;
 - All opportunities to re-let the site has been fully explored (including more flexible use of the space);
 - The site has been marketed using a variety of methods and marketing tools available that are likely to attract office occupiers; and,
 - The site has been marketed at a price which is considered reasonable (based on recent and similar deals or transactions).
- 7.3.7 Proposals for flexible working / co-working will be supported where they are in line with policy EC7.2 above
- 7.3.8 Proposals for change of use from offices to alternative uses on the lower ground located in town centres should be dealt with under policies elsewhere in this plan including: *Protection of shopping facilities within designated shopping frontages*. Also outside of town centres, change of use from offices to alternative uses should be in accordance with policy Ec7.4 Protection of scattered employment sites.

Policy Ec7.4

Protection of scattered employment sites

a) Proposals that result in the loss of scattered employment sites will be resisted 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 makes 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).

b) If proposals do not meet policy requirements Section (a) (iii) above, the council will seek measures to mitigate against the loss of employment land. Such measures may include:

- i. Providing employment, as part of a mixed use scheme on-site; or,
- ii. Providing alternative sites for employment use (for instance, 'land swaps').

Justification:

7.4.1 The London Plan and Merton's strategic policy on economic development in this draft Local Plan seeks to support new, maintain and protect existing employment land in Merton to optimise employment opportunities for Merton's residents by supporting the development of employment uses to the most appropriate locations. This policy aims to deliver these policies by setting out a detailed approach to the protection of employment land for which there is need.

7.4.2 Businesses or community uses will be supported on scattered employment sites throughout Merton. Employment on scattered employment sites contributes towards Merton's existing and growing diverse economy.

- 7.4.3 Employment sites outside the designated town centres and designated employment areas (i.e. those not shown on the Policies Map) are referred to as 'scattered employment sites'. For the purposes of this policy, 'employment' and business refers to premises or land that operates within the B1 (a), B1 (b), B1(c), B2 and B8 use class under the Town and Country Planning Use Classes Order (as amended). 'Community' uses refer to premises or land that operates within the D1 use class. It is intended for this draft policy to protect other uses located on scattered employment sites such as leisure and entertainment (D2 Use Class) and uses identified as sui generis uses where appropriate.
- 7.4.4 Since 2013 the General Permitted Development Order (GPDO) has been changed to allow various changes of use to take place without the need for planning permission. Therefore these planning policies will not apply.
- 7.4.5 The GPDO has also been changed to allow office uses to permanently change to residential uses and to allow offices to change to state funded schools permanently; again there are proposed exemptions to this policy.
- 7.4.6 In instances where planning permission is required for the change of use from offices to residential outside of town centres or designated employment sites, proposals are required to meet this policy.
- 7.4.7 There is constant pressure on scattered employment sites to be redeveloped for uses that will bring high value to the developer, especially housing. Throughout the years, Merton has completed a number of viability studies to support policies. These studies demonstrate that in Merton over the past 10 years, residential uses have a significantly higher land value, than other land uses. Therefore the 'hope value' that speculative developers can pay for such sites in the expectation of planning permission for housing displaces existing jobs as well as outbidding potential investors in premises for business and community uses.
- 7.4.8 A delicate balance needs to be struck between delivering new homes and business/job growth. Based on Merton's characteristic, a sustainable future for the borough relies on maximising opportunities for employment and local businesses, in some cases by prioritising business and jobs over high value alternative uses. Without this approach, Merton would not be able to support a diverse local economy and promote a commercially viable, thriving mix of employment, which increase jobs and services to local people. Scattered employment sites are valuable to local communities in

providing services and local jobs whilst reducing the need to travel, helping create and maintain a robust local economy and achieving sustainable, mixed use communities.

7.4.9 However, where the employment use is not compatible with a residential environment because of noise, smell or other pollutants then the council will encourage redevelopment to community or other employment uses that do not harm the amenity of residential neighbours. The appropriateness and lack of financial viability of the site for employment purposes have to be demonstrated before the loss of employment land will be permitted. Proposals for sui generis use on scattered employment sites, not least because by their nature, must be treated on their individual merits and considered on a site-by-site basis.

7.4.10 In these instances, the applicant would need to demonstrate, to the council's satisfaction, that they have undertaken full and proper marketing of the site at reasonable prices for employment or community uses for a period of 30 months (2 ½ years) as well as evidence to show that the site is no longer appropriate to accommodate employment or community uses.

7.4.11 To demonstrate that full and proper marketing has been undertaken to justify that the employment and community uses are no longer viable, the council requires the applicant to demonstrate that:

- The site has been marketed for employment and community uses for the time period detailed in policy unless otherwise agreed with the council;
- All opportunities to re-let the site has been fully explored (including more flexible use of the space);
- The site has been marketed using a variety of methods and marketing tools available that are likely to attract business or community occupiers; and,
- The site has been marketed at a price which is considered reasonable for employment or community uses (based on recent and similar deals or transactions).

7.4.12 If proposals do not meet the terms of this policy, the council may also seek measures to mitigate against the loss of employment or community use.

7.4.13 In circumstances where proposals for mixed use development are considered, proposals must be designed to ensure the future occupation and function of employment uses, upon completion. The premises/ sites retained for employment uses must:

- Be of an attractive size and character for occupation by employment and community uses and flexible to accommodate alternative uses;
- Be compatible with the character and appearance of the area;
- Be designed to accommodate the proposed use (and other uses);
- Not be harmed by way of noise, disturbance, loss of light or privacy;
- Allow adequate safe vehicle access to and from the highway, provide adequate car parking facilities (both cycling and car parking) and there should be links to modes of transport other than private vehicle; and,
- The site must be built out in full before proposals for change of use from employment to alternative uses will be considered by the council.

7.4.14 The council may require other measures to support the local economy. Such measures may include the applicant providing alternative sites for employment use and community uses for which there is need, (for instance 'land swaps') or providing equivalent employment in jobs or floorspace, as part of a mixed use scheme on-site.

Policy Ec7.5

Local employment opportunities

Merton want to ensure that residents and local businesses are supported within the borough through local employment, business retention and inward investment opportunities which will lead to greater local economic growth. This can be achieved in part, by enabling skills, jobs creation and local procurement during new development.

With this in mind the Council will:

(a) Work with developers to increase skills and employment opportunities in Merton by requiring all major development to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Opportunities for employment and skills training will be considered by means of section 106 planning obligations for major developments:

- residential developments of 10 units or more
- non-residential developments exceeding 1,000m².

(a) Will seek to secure a minimum of 10% of the total jobs created by the construction of new development and 20% end use job opportunities and apprenticeships to be advertised exclusively to local residents through the Council's economic development officer or appropriate nominated agencies for a minimum period so that local people can be given the opportunity to fill these vacancies. A local employment strategy may be require will for very large development schemes.

(b) Work with local training providers to aim to ensure that local residents are given access to the right skills training so that they can take advantage of opportunities created by new development and help address skills deficits in the local population.

(c) Require the local employment strategy for major developments to cover procedures to ensure small and medium sized local enterprises have access to supply chain tender opportunities for the procurement of goods and services generated by the development both during and after construction, having regard to the council's Local Procurement Code of Practice.

(d) Demonstrate good practice when procuring its own goods and services by following the Public Services (Social Value) Act through Merton's Social Value Toolkit.

Justification:

7.5.1 The council seeks to maximise employment, business and other economic development opportunities for Merton's residents. This policy will contribute towards delivering these policies by encouraging major developments to contribute towards increasing employment opportunities in Merton.

7.5.2 In accordance with the London Plan Policy E11, the council is committed to training, work placements and apprenticeships and views them as being a sustainable way to improve employment prospects for local people. The Council is determined to ensure that the use of S106 obligations helps to secure placements for local people both during the construction phase of building projects and in the resultant end use.

7.5.3 Merton is a relatively affluent borough and overall Merton is one of the less deprived areas in the country but parts of the borough have pockets of deprivation and higher rates of unemployment and lower levels of skills/qualifications. We want to address this imbalance by providing employment opportunities for all residents.

7.5.4 The west of the borough, particularly Wimbledon (the borough's largest town centre) is generally more affluent, with a higher proportion of the area's residents having higher level skills which enable them to get jobs locally, in neighbouring boroughs and in central London.

7.5.5 In contrast, the centre and east of the borough, contain pockets of deprivation - characterised by:

- Long-term unemployment;
- Low education and skills levels particularly among the under-24s;
- Lack of jobs and major employers; and,
- Physical decline which does not encourage private sector investment.

7.5.6 Reducing deprivation, sourcing local labour and reducing the need to travel is a fundamental part of creating sustainable communities.

7.5.7 The Mayor's London Plan requires strategic development to support local employment, skills and training. Strategic developments are those defined as the development of over 150 units for residential use and development over 15,000 sqm for commercial uses. However Merton is a small borough and it is highlighted in the Authorities Monitoring Report's throughout the years that Merton rarely sees development of this quantum and size. Therefore to increase employment opportunities for Merton's residents and for new developments to benefit the whole community, this policy proposes that major schemes contribute towards increasing residents' employment opportunities and skills where viable.

7.5.8 For this policy major developments include proposals for:

- i. Residential development comprising of 10 units or more;
- ii. Commercial developments where the floor space is 1,000 square metres or more.

7.5.9 'Other opportunities' includes applicants procuring local companies in the supply-chain and may include offering local residents apprenticeships or work experience to improve skills. Apprenticeships/ work experience opportunities would be particularly relevant for the larger major developments.

7.5.10 For applicants to demonstrate to the council that they have met this policy, applicants should advertise employment and business procurement opportunities including jobs, work experience and apprenticeships for residents for a reasonable length of time agreed with the council's economic development officer or appropriate nominated agencies.

- 7.5.11 The council currently works in partnership with a number of agencies to secure places for apprenticeships and other employment opportunities throughout Merton.
- 7.5.12 For larger major schemes, planning conditions may be used to require the submission of a local employment strategy. This local employment strategy should outline measures to demonstrate that training and employment opportunities could be accessed by local people during the construction phase and resultant end-use of the scheme.
- 7.5.13 The council realises that it may not be feasible for all major schemes to meet this policy requirement particularly developments that are close to the size thresholds detailed above. In circumstances where applicants, due to feasibility issues, find it difficult to meet this policy, this would need to be demonstrated to the council.
- 7.5.14 The council wish to encourage use of existing local businesses to support new development and will do this by encouraging local supply chain procurement. Not only does this support local businesses it also has an environmental and social benefit for businesses and residents.
- 7.5.15 The Council's Social Value Toolkit has been designed to help council officers along with providers of council goods and services to understand what Social Value is in order to comply with legislation and be able to practically consider and achieve Social Value from commissioning and procurement activities. In doing so, we can help achieve positive outcomes and value for the Borough through the contracts we procure.

7. town centres



Policy Tc7.6

Location and scale of development in Merton's town centres and neighbourhood parades

The council will support new development in Merton's town centres and neighbourhood parades commensurate with their scale and function, providing it respects or improves the character and local environment of the area by:

a) Supporting proposals:

i. for development that provides a range of unit sizes in Wimbledon, Colliers Wood, Mitcham and Morden

ii. for development up to 1,000 sqm per unit of floorspace for town centre type uses in the designated local centres of Arthur Road, Motspur Park, North Mitcham, Raynes Park and South Wimbledon. The council will resist major increases (above 1,000 sqm) in town centre type use floorspace in local centres unless it contributes to the council's regeneration objectives.

iii. that do not amalgamate existing ground floor shopping frontages in Wimbledon Village local centre so as to result in a large unit (with a floorspace of 280sqm or more).

b) Maintaining neighbourhood parades to provide convenience shopping and other services within walking distance of local residents. Large increases in commercial floorspace in neighbourhood parades will be resisted.

Justification

7.6.1 The council aim to maintain, enhance and protect Merton's town centres as focal points for residents and visitors that provide civic, retail and other commercial services and facilities. This policy will contribute towards delivering this by setting out how proposals relating to the scale and function of proposed development in Merton's town centres and neighbourhood parades will be considered.

- 7.6.2 As detailed in the London Plan, the definition of town centres includes major, district and local centres.
- 7.6.3 This term will be used throughout this document to provide policies or guidance that is relevant to all of these types of town centres.
- 7.6.4 The NPPF 2018 promotes the vitality and viability of town centres as these provide a sense of place for Merton's residents and are important areas for communities. The aim is to focus growth and development of a wide range of shops, leisure and similar trip-generating uses to town centres. However growth needs to be considered alongside the need to conserve the local heritage and character, as well as providing a focus for community and civic activity.
- 7.6.5 The council will support development in Merton's town centres and neighbourhood parades commensurate with their scale and function and where it respects or improves the character and local environment of the area.
- 7.6.6 Merton's town centres and neighbourhood parades provide shops and services that meet different needs of residents. But these town centres and neighbourhood parades also have different characteristics and levels of capacity to grow in the future. The council encourages any use that and services, cafes, restaurants, leisure and entertainment facilities, offices and community uses to locate in Merton and will support growth that is appropriate to designated town centres, neighbourhood parades and the surrounding area. This will also ensure that development that attracts a large number of trips is located in places which are accessible by a range of transport choices.

Merton's Major and District town centres

- 7.6.7 Wimbledon is Merton's major centre and is the principal shopping destination in the borough.
- 7.6.8 Attractive to residents, tourists, businesses and their staff, Wimbledon has a large variety of shops, services, cafes, restaurants, cinemas, theatres and offices. By capitalising on Wimbledon's international and national reputation for quality, the council hopes to further enhance the character and vibrancy of the area to create a sense of place and ensure that there is continual activity throughout the day and at the weekend for residents, workers and visitors whilst protecting its heritage assets.

- 7.6.9 Wimbledon has potential to become a Metropolitan centre and is already functioning as one for its attractiveness to visitors (including its cultural and social offer), attractiveness as a business location, ease of access, and high quality environment. The London Plan describes Metropolitan Centres as those that “serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. *These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings*”.
- 7.6.10 As district centres, Colliers Wood, Mitcham and Morden provide shops, services, cafes/ restaurants and local businesses to meet the everyday needs of the local community.
- 7.6.11 Colliers Wood’s retail offer is on a par with many major centres in London. Over the past 10 years the enhancement through Connecting Colliers Wood, redevelopment of the Tower and enhancement of the town centre offer with restaurants, cafes a new library and other services has created a far greater diversity of offer to its visitors.
- 7.6.12 Mitcham has a unique cultural identity and character, recently reinforced through Rediscover Mitcham, and supports a daily street market which operates in the main shopping area of Mitcham. Merton’s Civic Centre and local businesses generally serving day-to- day needs’ are located in Morden. Morden sees high footfall passing through the centre, connecting between the buses, underground, car parking and nearby train and tram when people commute to and from work. In terms of the scale and type of shops and services.
- 7.6.13 Wimbledon, Colliers Wood, Mitcham, and Morden are suitable for a wide range of units sizes. To avoid adverse impacts on existing centres, town centre floorspace over 1,000 square metres will not be supported outside Wimbledon, Colliers Wood, Mitcham, and Morden. Small units will also be welcomed, particularly in Wimbledon and Colliers Wood, where smaller units will help to attract and retain a diverse town centre offer and give more options to independents and start ups

Local centres

- 7.6.14 Arthur Road, Motspur Park, North Mitcham, Raynes Park, South Wimbledon and Wimbledon Village are designated as local centres. Except for Wimbledon Village, these local centres provide shops and services to meet the everyday needs of the local

community and are places for small and local business. These local centres serve small catchments and are within walking distance of local residents.

7.6.15 South Wimbledon is a newly proposed Local Centre in this draft Local Plan with specific details available in draft policy N3.5

7.6.16 Wimbledon Village has more of a niche/specialist role and a unique character. To retain and reinforce its character and offer, it is considered that the amalgamation of existing ground floor unit frontages facing Wimbledon High Street, Church Road and Ridgway that would result in a large unit (with a gross floorspace of 280 sqm or more) would be inappropriate, having regard to the existing scale and character of the area. Merton's Annual Shopping Survey shows that the average ground floor unit size of existing town centre types uses in Wimbledon Village is less than 100sqm gross floorspace, thus the amalgamation of existing units that would result in a ground floorspace over 280 sqm would be quite large for this area. While amalgamation of unit frontages would be inappropriate, use of upper floors within the same frontage or use of the rear of the premises may be acceptable to deliver town centre type uses above 280sqm.

7.6.17 Local centres complement Merton's main town centres, providing local services and enhances the area's character. Development that provides a major increase (over 1,000 sqm) of town centre type uses will not be supported in the local centres of Arthur Road, Motspur Park, North Mitcham, Raynes Park and South Wimbledon unless it contributes to the council's regeneration objectives.

Neighbourhood parades

7.6.18 To meet the day-to-day needs of local communities and to reduce the need to travel, essential local shops such as small supermarkets, pharmacies and post offices should be retained within 5 minutes' walk (400 metres) of residential areas.

7.6.19 Neighbourhood parades, located throughout the borough, have been designated to ensure that residents and workers continue to have access to a range of important local shops available for their day- to-day needs, which are easily accessible to people without a car or with restricted mobility.

7.6.20 Neighbourhood parades complement the local shopping facilities provided in Merton's town and local centres and ensure that local convenience shopping facilities are within 5 minutes' walk (400 metres) of residential areas in Merton.

Small units

7.6.21 The availability of small units provides improved choice for business location and affordability. In turn, having a variety of businesses provides choice for consumers and this contributes significantly towards maintaining and enhancing the attractiveness and viability of Merton's town centres. Small units are often more affordable thereby encouraging more specialist or independent retailers.

7.6.22 The need to maintain and to provide additional small units is particularly relevant to supporting business retention and diversity in Wimbledon town centre, Colliers Wood and Wimbledon Village.

7.6.23 For retail (A1 Use Class) proposals, Merton's definition of small, large and major developments refer to net floorspace. For all other town centre type uses the definition of small, large and major developments refer to gross floorspace.

Shopping areas and important shopping frontages

A: Wimbledon major centre

Wimbledon's central shopping frontage	Units
1-10 Wimbledon Hill Road and 2-22 Wimbledon Bridge	10
1-59 The Broadway and Victoria Crescent (area of land within P.3 development)	20
Centre Court Shopping Centre	70
Core shopping frontage	
2-78 The Broadway	40
13-23 Wimbledon Hill Road	2
16- 26 Wimbledon Hill Road and 8-12 Worple Road	4
2- 10 Hartfield Road and Site R/o 39 -59 The Broadway	4
3-25 Wimbledon Bridge and 1-11 Wimbledon Hill Road	12
Secondary shopping frontage	
75-91 The Broadway and 2-12 Gladstone Road and 1-13 Russell Road	14
80-134 The Broadway	19
25-57 Wimbledon Hill Road	14
28-68 Wimbledon Hill Road	19
1-8 The Pavement, Worple Road and 8-17 Worple Road	7
97-127 The Broadway	3
27-37 Hartfield Road	5
1-13 Queens Road	5
12-26 Hartfield Road and site r/o 39-59 the Broadway	4

B. Town centres

Colliers Wood district centre

Primary shopping frontage	Units
Priory Retail Park	6 units
Tandem Centre 1-14	14
Savacentre, (Sainsburys, Marks & Spencers etc)	6
Secondary shopping frontages	
Christchurch Road 2-34 and Britannia Point	14 units
High Street Colliers Wood 164-222	11
High Street Colliers Wood 105-129	4

Mitcham district centre

Primary shopping frontage	Units
205-223 London Road	10
1-11 Majestic Way	11
1-27 Upper Green East	12
1-8(cons) Langdale Parade, Upper Green East	8
225-249 London Road	12
2-16 Upper Green East	7
Secondary shopping frontages	
1-6 Fair Green Parade and 12-16 Upper Green West	5
9-17 Western Road	1
251-265 London Road	7
272-292 London Road	9
7-13 Fair Green Parade	7
29-51 Upper Green East	11
234-260 London Road	11
1-10 Upper Green West	9

Morden district centre

Primary frontage	Units
11-63 London Road	26
2-86 London Road	39
29-35 Aberconway Road	5
Secondary shopping frontage	
2-16 Crown Lane	7
1-35 Abbotsbury Road	16
2-30 Abbotsbury Road	13
36-46 Aberconway Road	5
1-9 London Road	4

C: Local centres

Arthur Road

Core shopping frontage	Units
120-134 Arthur Road, SW19	6
141-187 Arthur Road, SW19	16

Secondary shopping frontages	
144- 164 Arthur Road, SW19	9

Motspur Park

Core shopping frontage	Units
320-336 West Barnes Lane	9
341-357 West Barnes Lane	8
Secondary shopping frontages	
338-354 West Barnes Lane	8
359-367 West Barnes Lane	5

North Mitcham

Core shopping frontage	Units
271-313 Mitcham Road	14
1-17 London Road	9
Secondary shopping frontages	
23-59 London Road	18
12-62 London Road	18

Raynes Park

Core shopping frontage	Units
4-82 Coombe Lane and 1A Amity Grove	32
2-16 Lambton Road	8
308-318 Worple Road	6
Secondary shopping frontages	
1-17 Station Buildings	5
207-211 Worple Road	3

South Wimbledon

Core shopping frontage	Units
Secondary shopping frontages	

Wimbledon Village

Core shopping frontage	Units
1-40 (cons) High Street	44
49-54 (cons) High Street	5
56-98 (cons) High Street	41
Secondary shopping frontages	
47-48 (cons) High Street	2
41-45 (cons) High Street	3
2-14 Church Road	7
1-43 Church Road	18

Neighbourhood parades

Parade Name	Units
Cannon Hill Lane and Martin Way; 135-151 Cannon Hill Lane and 244- 262 Martin Way (Cannon Hill Ward)	17
Central Road: 44a – 60 Central Road, Morden (St. Helier Ward)	8
Chestnut Grove and South Lodge Avenue; 158-174 Chestnut Grove, Pollards Hill and 10-32 South Lodge Avenue, Pollards Hill (Pollards Hill ward)	14
Church Road: 45-59 Church Road, Mitcham (Cricket Green)	3
Coombe Lane, West Wimbledon; 253 – 271 Coombe Lane, Raynes Park and 348-364 Coombe Lane, Raynes Park (Raynes Park and Village wards)	17
Durnsford Road: 373-421 Durnsford Road, SW19, north of Arthur Road town centre (Wimbledon Park ward)	23
Epsom Road: 41b-59 Epsom Road, Morden (St.Helier ward)	12
Grand Drive (north): 244A – 264A Grand Drive, Morden (Lower Morden ward)	9
Grand Drive: 300-372 Grand Drive, Lower Morden (Lower Morden ward)	14
Green Lane: 99-137a Green Lane, St. Helier (St. Helier ward)	18
Grove Road: 366-378 Grove Road, Mitcham (Longthorton ward)	7
Haydons Road: 284-296 Haydons Road and 319 – 335 Haydons Road, South Wimbledon (Wimbledon Park ward)	16
High Street: 29 -43 High Street and 46 – 72 High Street, Colliers Wood (Colliers Wood ward)	18

Kingston Road: 80-112 Kingston Road (Abbey ward)	14
Leopold Road; 1-27 Leopold Road and 2a – 32 Leopold Road, SW19 (Wimbledon Park and Hillside wards)	26
Manor Road and Northborough Road; 207-219 Manor Road and 291a – 207 Northborough Road, Pollards Hill, Mitcham (Longthornton ward)	17
Martin Way: 43-55 Martin Way, Morden (Cannon Hill ward)	7
The Rush: 1-12 (cons) Merton Park Parade (The Rush), near Wimbledon Chase (Merton Park ward)	12
Ridgway: 65-89 Ridgway, SW19, Wimbledon (Hillside ward)	11
St. Helier Avenue: 41-67 St.Helier Avenue (Ravensbury ward)	14
Streatham Road; 196 – 172B Streatham Road and 175 – 221 Streatham Road, Streatham (Graveney ward)	31
Tamworth Lane: 297- 301 Tamworth Lane Mitcham (Longthornton ward)	2
Tudor Drive: 11-27 Tudor Drive, Morden (Lower Morden ward)	7
Wimbledon Chase: 288 – 312 Kingston Road and 1A (Rothsey Avenue) – 353 Kingston Road, Wimbledon Chase (Merton Park ward)	20

Policy Tc7.7

Protection of shopping facilities within designated shopping frontages

Making choices about where retail and other town centre type uses locate contributes towards maintaining and enhancing the attractiveness of town centres by encouraging more people to shop in these locations. To maintain and improve the overall vitality and viability of Merton's town centres, the council will permit proposals provided that the following criteria have been met:

Town Centres

a) In '**Wimbledon's central shopping frontage**', the loss of retail units (Use Class A1) will be resisted. Proposals for a wider range of uses such as restaurants and cafes and bars, cultural and community use and leisure and entertainment uses (A3, A4, D1 and D2 Use

Class) will be permitted to occupy an A1 retail unit subject to:

- (i) It can be demonstrated by full and proper marketing, to the council's satisfaction, of the site for A1 retail use for at least 12 months;
- (ii) The proposed change should not detract from the primary retail function of the area; and,
- (iii) Approximately 50% of units in the central shopping frontage should remain in retail use (A1 Use Class), taking into account unimplemented planning permission for change of use.

b) The '**core shopping frontages**', proposals for a wider range of uses such as restaurants and cafes and bars, cultural and community use and leisure and entertainment uses (A3, A4, D1 and D2 Use Class) will be permitted to occupy an A1 retail unit as long as the proposed change does not detract from the primary retail function of the area;

c) The '**secondary shopping frontages**', as well as uses permitted in Section (b), proposals for financial and professional services (A2 Use Class), hot food takeaways (A5 Use Class) and offices (B1[a] Use Class) will be permitted. Approximately 50% of units

should remain in commercial uses (A1, A2, A3, A4 and A5 uses), taking into account unimplemented planning permission for change of use.

d) **Other shopping frontages within town centres**, a wide range of town centre type uses including shopping, leisure, entertainment, cultural, community and office uses will be supported which contribute towards the vitality and viability of town centres.

e) **'Neighbourhood parades'**, proposals for a wide range of town centre type uses appropriate to the scale of the parade will be permitted. A minimum of 30% of units should remain in retail use (A1 Use Class), taking into account unimplemented planning permissions.

All frontages in Merton's town centres and neighbourhood parades

f) **'Vacant units in shopping frontages'**, temporary planning permission for re-occupation of vacant units may be granted .

g) **'All shopping frontages in Merton's town centres and neighbourhood parades'**, subject to the relevant considerations in this draft policy the council will permit the change of use in shopping frontages where:

- i. The proposed use is compatible with a shopping frontage and provides a direct service to the general public;
- ii. The proposal will result in an 'active street frontage';
- iii. The vitality and viability of the town centre or neighbourhood parade is not likely to be significantly harmed;
- iv. A window display is provided; and where,
- v. No significant adverse effects on the amenities of nearby residents, road safety, car parking or traffic flows would result from the proposal

Justification

Primary shopping area – all town centres

- 7.7.1 The location of similar businesses, such as shops, cafes, restaurants, theatres and cinemas together makes town centres more attractive and sociable, increasing the footfall which helps support businesses and helps to create an identity and a sense of place for the community. National guidance makes clear that local authorities should define the extent of the Primary Shopping Area and the town centre boundary. The Primary Shopping Area places retailing and social activity at the heart of the town centre and it consists of defined core and secondary shopping frontages. Other town centre activities including professional and financial services, cinemas and hot-food takeaways lead away from the primary shopping area. Merton's Policies Map (2013) details the extent of Merton's town centre boundaries and the designated core and secondary shopping frontages.

Wimbledon's central shopping frontage

- 7.7.2 In order for Wimbledon town centre to maintain its position as a major centre, it is necessary to continue to support and improve retail facilities in the centre. Supporting retail at the heart of the town centre, visible on arrival from the station helps to increase footfall and thus Wimbledon's attractiveness. Within Wimbledon's central shopping frontage (no changes proposed since the Policies Map 2014) proposals for retail uses (A1 Use Class), in particular comparison retail will be encouraged.

Core shopping frontage – all town centres

- 7.7.3 The core shopping frontage retailing and social uses are strongly supported to encourage greater footfall and improve the viability of the town centre. It is important to maintain a full range of shopping facilities and social uses in these centres and ensure that they are close together in relatively convenient and compact core frontages.

- 7.7.4 Due to changes in consumer behaviour including increase in on-line shopping and home shopping, it is expected in the future that town centres will no longer be retail-focused but instead will provide a social environment for residents, workers and visitors to meet and visit. Although our evidence shows that vacancies in Merton's town centres are lower than both the regional and national average, over the next 10 years the council wants to ensure that Merton's town centre premises remain occupied and the town centres continue to thrive. In order to ensure that Merton's town centres remain a focal point for social activity, providing services and facilities as well as employment to residents and attract visitors, the council propose that Merton's shop front designations are more flexible to deal with changes to the economy and shopping habits.
- 7.7.5 To ensure Merton's town centres can continue to offer an attractive environment for its users and remain relevant and vibrant to respond to changing consumer behaviour, the council will permit more social uses such as restaurants and cafes (A3 Use Class), public houses (A4 Use Class), cultural and community uses (D1 Use Class) and leisure and entertainment uses (D2 Use Class). These uses are considered more social uses as Merton's residents and workers can meet and enjoy activities with friends and family. These uses would also attract visitors to the area. The proposed use will need to have an active frontage and applicants should use Merton's shop front supplementary planning guidance 2017 to enable high quality design, regardless of the nature of the interior of the premises.
- 7.7.6 Amusement centres (use identified as sui generis use), financial and professional services (A2 Use Class) and hot food takeaways (A5 Use Class) are not compatible with the main retail or social function of the town centres and thus are not considered appropriate uses in Wimbledon's central shopping frontage and core shopping frontages.
- 7.7.7 To ensure some retail premises are maintained in town centres, local research supports approximately 50% of units in the designated shopping frontage to remain in retail uses (A1 uses), taking into account unimplemented planning permissions for changes of use.
- 7.7.8 When considering proposals, the proportion of retail units relates to a proportion of units situated within designated core shopping frontages of the whole town centre and not to the individual designated shopping parades. A 'unit' refers to individual shops.

Secondary shopping frontage – all town centres

- 7.7.9 In secondary shopping frontages, a wider range of uses such as financial and professional services (A2 Use Class), hot food takeaways (A5 Use Class) and offices (B1[a] Use Class) will be supported.

- 7.7.10 To ensure that there is a range of commercial services and facilities within Merton's town centres, the council propose to place a limit on the proportion of change of use in the designated shopping frontage away from uses within commercial use (within the A Use Class only). Local research supports approximately 50% of units in the designated shopping frontage to remain in commercial uses (within the A1, A2, A3, A4 and A5 only), taking into account unimplemented planning permissions for changes of use.
- 7.7.11 Approximately 50% of A Use Class units in the designated secondary shopping frontage relates to a proportion of units situated within designated secondary shopping frontages of the whole town centre and not to the individual designated shopping parade.

Other frontages within town centres

7.7.12 In these frontages a wide range of town centre uses will be supported including retail, leisure, entertainment, cultural, community and offices which contribute towards the vitality and viability of town centres. Activities should complement each other and the centre and should be of a use, design and scale proportionate to the area.

7.7.13 All town centre development proposals must have active street frontages to contribute towards their vibrancy and to promote a positive identity within Merton's town centres.

Neighbourhood parades

7.7.14 Neighbourhood parades are identified to ensure that local shopping facilities are retained within walking distance of residents to meet their day-to-day needs.

7.7.15 To ensure that convenience shops are retained, local research supports a minimum of 30% of units in a designated neighbourhood parade to remain in retail use (A1 Use Class), taking into account unimplemented planning permissions for changes of use.

7.7.16 When a change of use from convenience, comparison and service retail use (A1 Use Class) is proposed, the new use must provide a local service, such as businesses (A2 and B1[a] Use Class), restaurant and café (A3 Use Class), pub and wine bar (A4 Use Class), hot food takeaways (A5 Use Class) and health and community uses (D1 Use Class) which:

- supports the vitality of the parade;
- provides a window display; and,
- has no significant adverse effects on the amenities of residents, other businesses, road safety or traffic flows.

Vacancies in frontages in town centres

7.7.17 In town centres temporary planning permission may be granted for meanwhile and temporary uses vacant shopping frontages until these units are re-occupied by uses that are appropriate to that retail frontage. Temporary Planning Permission will be considered based on the proposal(s) put forward. These proposals must complement surrounding uses in the area and must not harm nearby business and residential amenity..

Active street frontages

7.7.18 Active street frontages contribute significantly to the vibrancy, sense of place and safety of town centres. Allowing people to access and view inside and outside of the buildings provides natural surveillance, activity and contributes towards the vibrancy of town centres. Conditions may be placed on planning applications to ensure that proposals do not result in dead frontages, for instance, restricting internal advertising. Applicants should use Merton's supplementary planning document on Shop Fronts (2017) to enable the high quality design of shopfronts, regardless of the internal use.

Marketing

7.7.19 To demonstrate that full and proper marketing has been undertaken, the council requires the applicant to demonstrate that:

- The unit has been marketed for the time period detailed in the policy unless otherwise agreed with the council;
- All opportunities to re-let the site has been fully explored (including more flexible use of the space);
- The site has been marketed using new (on the internet) and traditional marketing tools available; and,
- The site has been marketed at a price which is considered reasonable (based on recent and similar deals or transactions).

7.7.20 Since 2013 the General Permitted Development Order (GPDO) has been changed to allow various changes of use to take place within former shops or shopfronts without the need for planning permission. Therefore these planning policies will not apply.

Policy Tc7.8

Development of town centre type uses outside town centres

To maintain and enhance the vitality and viability of Merton's town centres, proposals for the development of town centre type uses 'edge-of-centre' and 'out-of-centre' will be permitted only where it can be demonstrated that:

- a) The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment submitted is proportionate to the scale of the development proposed and satisfies the council's requirements.

- b) Local convenience development outside town centres meets all of the following criteria:
 - i. The proposal will be a replacement for an existing convenience shop; or,
 - ii. The proposal will meet local needs in an area identified as deficient in local convenience shopping (including convenience retail activity in petrol stations); and
 - iii. The overall floorspace of the local convenience shop (including petrol stations) would not exceed 280 sqm net retail floorspace.

- c) Vitality and viability of Merton's existing town centres are not harmed. Planning conditions may be imposed on applications, to ensure that proposals do not have an adverse impact on the vitality and viability of existing town centres. Such conditions may:
 - i. Prevent the amalgamation of small units to create large out-of-centre units;
 - ii. Limit internal development to specify the maximum amount of floorspace permitted; or,
 - iii. Control the type of goods sold or type of activity.

Justification

- 7.8.1 This policy will contribute towards delivering the “town centre first” approach set out in the NPPF 2018, planning practice guidance and the London Plan by setting how proposals for town centre type uses outside of Merton’s town centres will be considered.
- 7.8.2 The NPPF 2018 and the London Plan support the “town centres first” approach: focusing growth of retail and leisure activities, businesses and other town centre type uses within town centres. This helps create an attractive destination, increasing footfall with advantages for both businesses and consumers and also creates a sense of place for Merton’s residents. Also this reduces the need for residents, workers and tourists to travel to a variety of different places to access shops, services and activities.
- 7.8.3 As Merton is one of the smaller boroughs in London, proposals for new town centre type uses located at the edge-of-centre and out-of-centre, will need to demonstrate that the sequential approach has been appropriately applied. In line with national guidance for retail developments, edge-of-centre is defined as being within 300 metres from the Primary Shopping Area.
- 7.8.4 The Primary Shopping Area is where the council would expect to see a large concentration of convenience, comparison and service retail shops (A1 Use Class) to locate. For all other town centre type uses, edge-of-centre is defined as being within 300 metres from the town centre boundary. For office development this includes locations outside the town centre but within 500 metres of a public transport interchange.
- 7.8.5 Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area exceeds 280sqm. In accordance with the National Planning Policy Framework 2018 (NPPF), impact assessments will be required for leisure and office development above 2,500 sqm located outside town centres and not in accordance with the development plan.
- 7.8.6 Applicants are encouraged to contact the council at the early stages of the application process to discuss the scope of the sequential test and impact assessment required.
- 7.8.7 The council is continuing with the approach to protect small (c280sqm or smaller) food and convenience shops within 5 minutes’ walk (400m) of residential areas to reduce the need to travel and support residents day-to-day needs, complimenting the offer in town centres. Government’s changes to the General Permitted Development Order currently allow small shops (under 150sqm) to be converted to residential without the need for planning permission.
- 7.8.8 There is a decline in the number of petrol stations nationally and regionally, due to increasing

competition between multiple and more independent retailers. Although the council seeks to encourage more sustainable methods of travelling other than the private car, it is recognised that some residents in Merton rely on private vehicles as their preferred mode of transport.

- 7.8.9 Rather than residents in Merton travelling to neighbouring boroughs to access petrol stations, which is unsustainable overall, the council supports the retail convenience activity allowed in petrol stations to 280 sqm net floorspace. This measure provides landowners with more flexibility and will contribute towards increasing the financial viability of new and existing petrol stations. However, retail floorspace extensions above 280 sqm net will not be supported to ensure that such developments would not have an adverse impact on the retail vitality and viability of Merton's designated town centres

Policy Tc7.9

Protecting corner/ local shops

In predominantly residential areas, outside town centres and neighbourhood parades, to ensure that there are convenience shopping facilities and other services located within walking distance of all residents in Merton, the council will seek to protect corner/local shops for which there is need, by:

a) Permitting the change of use of a corner/ local convenience shops (A1 Use Class) to a wide range of uses including retail (A1), businesses (A2 and B1 [a] Use Class), cafes and restaurants (A3), public houses (A4), hot food takeaways (A5), health and community uses (D1), where:

- i. There are alternative convenience shops located within 400 metres;
- ii. The proposal will have no significant adverse effects on the amenities of nearby residents, road safety, traffic movements or car parking impacts; and,
- iii. Independent access to upper floors is ensured.

b) Supporting proposals for the change of use from uses detailed in section (a) of this policy to residential uses, where it can be demonstrated to the council's satisfaction that as a result of full and proper marketing of the site for at least 18 months (1½ years) at reasonable prices, that these uses are not viable.

c) Only permitting the change of use of a corner/ local convenience shops to uses detailed in section (a) of this policy where there are no alternative convenience shops located within 400 metres, where:

- i. It can be demonstrated by full and proper marketing of the site for convenience use at reasonable prices for at least 12 months (1 years) and to the council's satisfaction that there is no realistic prospect of convenience use in the future; and,
- ii. The proposal meets section (a) (ii) and (iii) above of this policy.

Justification

- 7.9.1 This policy helps to set out how proposals for the change of use of town centre type uses outside of Merton's town centres will be considered.
- 7.9.2 To support sustainable development, small convenience shops are encouraged to locate within 5 minutes walking distance (400 metres radius) of residential areas in Merton, to reduce the need to travel for day-to-day convenience items.
- 7.9.3 It may not be possible to retain retail use, especially if there is a lack of customer demand and/ or alternative facilities are available nearby.
- 7.9.4 Changes to the General Permitted Development Order (GPDO) since 2013 have allowed small shops (defined as less than 150sqm) to change to residential and various changes between retail and other commercial activities to take place without the need for planning permission. To note, there are exemptions to this policy.
- 7.9.5 Therefore, in instances where planning permission is required and where there are alternative convenience shops located within 400 metres, change of use of existing shops will be supported for a range of local services and businesses to help avoid long-term vacant premises and to help retain a mix of uses needed by the local community. This includes a wider range of retail (A1 Use Class), financial and professional services (A2 Use Class), cafes and restaurants (A3 Use Class), public houses (A4 Use Class), hot food takeaways (A5), local small business premises (B1 Use Class) and community and health uses (D1 Use Class).
- 7.9.6 Should there be a demand and growth for retail floorspace in the future, the GPDO currently allows cafes and restaurants and public houses to change into retail (A1 Use Class) without requiring planning permission. Though, local business premises (B1 Use Class) and community and health uses (D1 Use Class) cannot revert to retail (A1 Use Class) permanently without planning permission, they may still attract more people to Merton's high streets in turn making these high streets more vibrant and viable.
- 7.9.7 In circumstances where there are no alternative convenience shops located within 5 minutes walking distance (400 metre radius), proposals for change of use from convenience shops (A1 Use Class) to other uses will be permitted where it can be demonstrated to the council's satisfaction that as a result of full and proper marketing at reasonable prices for at least 12 months (1 year), that convenience retail uses are not viable.

7.9.8 To demonstrate that full and proper marketing has been undertaken, the council requires the applicant to demonstrate that:

- The site has been marketed for the time period detailed in policy unless otherwise agreed with the council;
- All opportunities to re-let the site has been fully explored (including more flexible use of the space);
- The site has been marketed using web-based and traditional marketing tools available; and,
- The site has been marketed at a price which is considered reasonable (based on recent and similar deals or transactions).

Food and drink / leisure and entertainment uses

Policy Tc7.10

Food and drink/ leisure and entertainment uses

Proposals for restaurants and cafes (A3 Use Class), public houses (A4 Use Class), hot food takeaways (A5 Use Class) and leisure and entertainment uses (D2 Use Class) will be supported provided all of the following criteria have been met:

- a) The proposals would not have an unacceptable impact on local amenity and the general environment, car parking, traffic congestion and road safety. Proposals would need to take into account the:
 - i. Size of unit;
 - ii. Characteristics and type of use proposed;
 - iii. The nature of the area;
 - iv. The number and size of other food and drink (Use Class A3, A4 and A5) and leisure and entertainment uses (Use Class D2) in the area;
 - v. The likely cumulative effect of these uses, including combined and cumulative effects at different times of the day and night; and,
 - vi. Whether the location is well served by public transport.
- b) Adequate noise containment measures are included and sound insulation is provided, where appropriate, to safeguard the amenity of adjoining residential and business uses;
- c) They would not have an unacceptable effect on local amenity through noise, disturbance or fumes;
- d) The proposed opening hours would be acceptable and;
- e) Adequate ventilation, waste disposal, litter management and crime prevention arrangements appropriate to the use and location can be provided.

Hot food takeaways

f) Proposals which results in an over-concentration of hot food takeaways (A5 uses) will not be permitted as this would detract from the ability to adopt healthy lifestyles.

Protection of public houses

Proposals that will result in the loss of a public house will only be permitted where all the following criteria are met:

- i) the applicant can demonstrate to the council's satisfaction that the public house is no longer economically viable and;
- ii) there are alternative public houses located within the local area.

Protection of leisure and entertainment

h) Proposals for the loss of entertainment and leisure facilities (D2 uses) will be supported where the applicant can demonstrate to the council's satisfaction that the leisure and entertainment uses are no longer viable.

Justification

7.10.1 The scale of new food and drink/ leisure and entertainment uses must meet the requirements of the draft policies elsewhere in this plan including *location and scale of development in Merton's town centres and neighbourhood parades*.

7.10.2 To strike a balance between Merton's aspirations for economic growth whilst protecting the vitality and viability of Merton's designated town centres, proposals for large food and drink/ leisure and entertainment uses will be required to submit a sequential test and may be required to submit an impact assessment.

Food and drink / leisure and entertainment uses

7.10.3 The food and drink sector and leisure and entertainment sector is very dynamic and increasingly diverse. This sector includes cafés, restaurants, pubs, cinemas and bowling

alleys. These facilities reflect changing population structures, lifestyles and expectations, and are now a regular part of many people's lives rather than a special event.

7.10.4 However, such uses can cause problems to nearby residents and businesses because of noise, fumes, traffic and other disturbance, especially at night. The council will therefore seek to control the size and location of such premises, particularly where there is residential accommodation adjacent, close to, or above premises. In addition, these amenity problems are exaggerated when groups of these facilities are located close together and their cumulative and combined impact becomes significant.

7.10.5 There has been an increase in the number of larger scale restaurants, pubs, leisure and entertainment facilities which are likely to generate large numbers of customers, and there are emerging concentrations of food and drink facilities and entertainment uses, especially in Wimbledon Village and Wimbledon town centre. These trends have increased concerns about the impact of these uses on residential amenity. For these reasons, Merton Council's Licensing Policy imposed a cumulative impact area in Wimbledon Village and Wimbledon town centre which restricts the number of licences available for cafes, restaurants, public houses, hot food take-away, leisure and entertainment uses (A3, A4, A5, D2 and some uses identified as sui generis use), if licences are required.

7.10.6 Where appropriate, conditions and legal agreements will be applied to ensure these developments meet the council's standards, and to protect residential amenity. Conditions may be applied to control the hours of opening, and type of use. Agreements may also include financial contributions for CCTV and other crime prevention and road safety measures.

Hot food takeaways

7.10.7 Local research in Merton shows that there is a concern with impacts of the over concentration of hot food takeaways (A5 uses), particularly on Merton High Street, London Road (Mitcham) and Streatham Road. Planning permission will not be permitted for hot food takeaways (A5 uses) where there is an 'over-concentration'. Generally an 'over-concentration' of hot food takeaways (A5 uses) would be the development of more than three hot food takeaways in a shopping parade of 10 consecutive shops.

7.10.8 By helping to prevent the over concentration of hot food takeaways in Merton's high streets, this policy helps ensure that residents have access and choice between a wide range of retail services and facilities including access to healthier food options.

7.10.9 This policy is part of a holistic approach that Merton Council, together with other organisations, is taking to improve opportunities for healthy lifestyles and to tackle obesity issues in the borough. Other projects in Merton include the “healthier catering commitment” to help food outlets offer healthier options.

7.10.10 When considering proposals for change of use to hot food takeaways, the first unit in each parade of shops (where possible) should be used as the starting point to ascertain if the proposal meets policy. A ‘unit’ refers to individual shops.

Protection of public houses

7.10.11 The national General Permitted Development Order (GPDO) currently allows public houses (A4 Use Class) to change to other uses including retail, professional and financial services, and restaurants without the need for planning permission.

7.10.12 In instances where planning permission is required, the council will resist the loss of public houses as they serve a community role (for example, by providing space for clubs, meetings or performances) unless:

-) alternative provision is available nearby (within 800 metres); and,
-) it can be demonstrated to the council’s satisfaction that the public house is no longer economically viable.

7.10.13 To demonstrate a public house is no longer economically viable, the applicants:

-) Would need evidence to demonstrate that the public house as a business is no longer economically viable; and,
-) To demonstrate that full and proper marketing of the site at reasonable prices for a period of
-) 30 months (2 ½ years) confirms the non-viability for these purposes.

Protection of leisure and entertainment facilities

7.10.14 Wimbledon town centre is identified as a ‘night time economy cluster of regional/ sub-regional importance’ in the London Plan. A cultural quarter exists at the eastern end of The Broadway, with two theatres¹, leisure, entertainment and community facilities and a selection of restaurants. Wimbledon town centre also has two cinemas, two health and fitness centres as well as wine bars and public houses. In addition to shopping and retail service offer and community facilities, these leisure and entertainment facilities makes Wimbledon vibrant and active throughout the day and evening therefore attracting residents, workers and visitors to the benefit of all businesses.

7.10.15 In terms of shopping floorspace, Colliers Wood competes directly with Wimbledon town centre by attracting many high street and multiple retailers. However Colliers Wood does not have the same range and choice of evening activities nor does it have the same internationally recognised reputation as Wimbledon. To ensure that Wimbledon remains vibrant despite competition from other town centres, the council will seek to attract and retain cultural, leisure and entertainment facilities in Wimbledon town centre.

7.10.16 In instances where planning permission is required for proposals for change of use from leisure and entertainment uses to alternative town centre type uses in Merton's town centres, the council will require full and proper marketing of the property for its permitted use at reasonable prices for a period of 30 months (2½ years). However, for proposals outside of town centres, where proposals for change of use from leisure and entertainment to alternative uses except employment (within the B Use Class) and community and cultural uses (D1 uses), the council would require full and proper marketing of the property for its permitted use at reasonable prices for a period of 30 months (2½ years).

Full and proper marketing

7.10.17 To demonstrate that full and proper marketing has been undertaken, the applicant will be required to demonstrate that:

- The site has been marketed for its appropriate use for the time period detailed in policy unless otherwise agreed with the council;
- All opportunities to re-let the site has been fully explored (including more flexible use of the space);
- The site has been marketed using new (on the internet) and traditional marketing tools available; and,
- The site has been marketed at a price which is considered reasonable for its appropriate use (based on recent and similar deals or transactions).

Culture, arts and tourism development

Policy Tc7.11

The council will maintain, improve and encourage cultural, arts and tourism in Merton by:

a) Supporting:

i. All proposals for cultural and tourism development which are likely to generate a large number of visitors in either Merton's town centres or other areas of the borough which have high levels of accessibility (PTAL level 3 or above) and are within close proximity to additional services for employees and visitors.

ii. Small (generally floorspace below 280 sqm) proposals for culture, arts and tourism development throughout the borough.

b) Encouraging improvements or expansion to existing cultural, arts and tourism in Merton, where this complements Merton's strategic objectives for the areas in which they are located.

c) Ensuring proposals for culture, arts and tourism developments are well designed, by requiring that:

i. The size and character of the site or building are suitable for the proposed use;

ii. The development will be compatible with the character and appearance of the area;

iii. The amenities of local residents and businesses will not be harmed by way of noise, disturbance, loss of light or privacy;

iv. There will be good access and links to modes of transport other than the private vehicle; and

v. Vehicular access to and from the highway will be safe.

d) Balancing the benefits of the submitted proposals opportunity to provide employment and other contributions to the local economy against the above criteria.

e) Supporting proposals for the change of use from culture, arts and tourist accommodation to alternative uses only if it can be demonstrated to the council's satisfaction that full and proper marketing of the site at reasonable prices for a period of 30 months (2 ½ years) confirms the financial non- viability for these purposes, unless suitable replacement site for the culture and arts use which is of better standard and quality is provided locally; or,

ii. Where it can be demonstrated that the existing tourist accommodation is no longer viable and does not provide facilities for the local community.

f) Subject to the draft policy *Protection of scattered employment sites*, protecting, maintaining and encouraging the work-space needed to support creative and cultural industries across the borough.

Justification

7.11.1 Culture, arts and tourism development creates economic and social benefits by attracting residents, business visitors and tourists. These uses provide employment and complement the retail and services, cafes, restaurants, public houses and leisure and entertainment facilities in Merton's town centres, contributing towards their overall vibrancy.

7.11.2 Arts and cultural uses include theatres, museums, galleries and concert halls. For this policy, tourist accommodation includes hotels, hostels [sui generis], accommodation such as AirB&B and guesthouses and other tourist accommodation.

7.11.3 To strike a balance between Merton's aspirations for economic growth whilst protecting the vitality and viability of Merton's designated town centres, proposals for new large culture, arts and tourist developments located edge-of-centre and out-of-centre, will be required to submit a sequential test.

7.11.4 Public Transport Accessibility Levels (PTAL) informs geographical area levels access to public transport. Higher PTAL levels are concentrated around the town centres and transport interchanges of Wimbledon, Morden, Colliers Wood, Mitcham and Raynes Park. Areas to the south east and south west of the borough have the lowest accessibility levels. As set out in the transport policies in this draft Local Plan, applicants should use Transport for London's WebCAT free online tool to get the most up to date assessment of public transport accessibility for their site.

Arts and culture

7.11.5 In Merton there are a number of arts and cultural uses that the council wishes to protect and enhance including theatres in Wimbledon town centre, handcrafts, creative industries and a theatre at Merton Abbey Mills, festivals and cultural activities (Abbeyfest, Cannizaro Festival, Mitcham Carnival), museums, sports arenas (such as the All England Lawn Tennis Club), Deen City Farm and the Wimbledon School of Art.

7.11.6 In Merton, the creative sector comprises a range of activities including publishing books, newspapers and software, printing, TV, radio and film production, photography industries in Wimbledon town centre, Colliers Wood and the South Wimbledon Business Area.

7.11.7 Proposals will be supported that build upon the borough's strength in creative and cultural information, particularly proposals that improve Merton's existing offer.

Tourism

7.11.8 There is a need for a variety of tourist accommodation and facilities to cater for leisure tourism and business visitors, to make Merton's tourism and culture sector more viable and sustainable all year-round. There is also a need for high quality hotels with conference facilities in Merton, particularly in Wimbledon town centre to support businesses visitors as well as to provide space for more local functions if needed. Merton is conveniently situated to help provide additional tourist facilities with good public transport links to central London. The borough also has its own tourist attractions, although those outside the Wimbledon area generally have a lower profile and consequently lower visitor interest.

7.11.9 Where possible, facilities provided to guests at larger hotels should also be made available to the local community to help improve the quality of life for local businesses and residents.

7.11.10 In determining the location of hotel, hostel, guest house and B&B facilities, good public transport services to central London and to other Merton tourist attractions are an important factor. Tourist accommodation should generally be situated in areas of good public transport accessibility and adjacent to the secondary road network to minimise traffic congestion for residents. The capacity and proximity of similar existing facilities should also be considered. The council will not support tourist accommodation (such as apart-hotels) where this displaces capacity for residential accommodation (Use Class C3)

Protection of arts, culture and tourism

7.11.11 Existing arts, culture and tourist attractions and accommodation will be protected in order to maintain the benefits of arts, culture and tourism to the local community. This will benefit the community by providing jobs, attracting visitors, contributing to the overall economy and to local educational resources, and providing a variety of facilities for both residents, businesses, students and visitors.

7.11.12 Since May 2013 government has made a variety of changes to the General Permitted Development Order to allow development to take place without the need for planning permission. In instances where planning permission is required, redevelopment or change of use from arts, culture and tourism development will be permitted only if the current use is proved to be unviable or unless it meets the policy exemptions detailed in this policy above.

7.11.13 To demonstrate that full and proper marketing has been undertaken, the council requires the applicant to demonstrate that:

- The site has been marketed for the time period detailed in policy unless otherwise agreed with the council;
- All opportunities to re-let the site has been fully explored (including more flexible use of the space);
- The site has been marketed using new (on the internet) and traditional marketing tools available; and,
- The site has been marketed at a price which is considered reasonable (based on recent and similar deals or transactions)