

12th December 2018
L 181212 SAV LBM - Local Plan Reps



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Dear Sir or Madam

DRAFT MERTON LOCAL PLAN 2020 – STAGE 2 CONSULTATION OCTOBER 2018 REPRESENTATIONS MADE ON BEHALF OF REEF ESTATES LTD

Introduction

We write on behalf of our client, Reef Estates Ltd (**'Reef'**), and set out below representations to the draft Merton Local Plan 2020. Representations have separately been submitted to the Future Wimbledon Masterplan Consultation, which runs concurrently with the emerging Local Plan Consultation until 6th January 2019.

These representations follow a previous submission in relation to the Call for Sites consultation in January 2018 in relation to 27-39 Hartfield Road, Wimbledon (**'the site'**). In this respect, our client has recently submitted a planning application for development at the site, comprising of a hotel and ground floor commercial uses. This follows pre-application discussions with the Local Planning Authority (**'LPA'**), which supported the principle of the proposed uses at the site, as well as presentation to the Design Review Panel, whereby the proposed scheme received a 'green light'.

This letter should also be read alongside our client's representations to the Future Wimbledon Masterplan consultation.

Against this background, we set out below our client's representations to assist the production of the new Local Plan.

Detailed Representations

General Comments

In order for the Plan to be found 'sound' it will be important that the Local Plan accords with the NPPF requirements, in particular Section 3 (Plan Making) and the presumption in favour of sustainable development (paragraph 11). This should include flexibility as required by the NPPF.

Site Specific Allocation – Site Wi4 (27-39 Hartfield Road, Wimbledon)

The site is allocated for development as 'Site Wi4' for:

'Any of the following or an appropriate mix of town centre types use such as retail (A1 Use Class), cultural, leisure and entertainment (D2 Use Class), offices (B1 [a] Use Class) and hotel (C1 use class). This site may incorporate residential (C3 Use Class) on upper floors.'

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The allocation also recognises that the site has excellent public transport access (PTAL 6b); that there is the opportunity for more intensive uses on the site; and the opportunity for shops / services at ground floor.

Our client generally supports the proposed allocation of the site. This reflects its town centre location, where such uses are supported in principle by the NPPF. It is however considered that reference to support for all Class A uses should be included, which would ensure flexibility for appropriate town centre uses in this 'secondary shopping frontage' and accord with the 'town centre first' approach in national policy. This would also be consistent with the identified 'opportunities' for the site, which includes reference to ground floor service uses, e.g. Class A3/A4 uses. Reference to 'town centre type use' should be amended to 'main town centre uses' for consistency with the NPPF.

We have separately submitted representations in relation to the Future Wimbledon Masterplan consultation, albeit we note that the Masterplan identifies the site for development of circa 8/9 storeys, broadly in line with our client's planning application for the site. It is recommended that the Local Plan allocation refers to the Masterplan in terms of the potential scale of development that could come forward and which would represent an appropriate opportunity for more intensive use of the site.

Finally, the site specific allocation should be accompanied by a plan identifying the location of the site, which for the avoidance of doubt should reflect the Plan attached at **Appendix 1**.

Other Policies

We provide comment on a number of other policies below.

Policy N3.6 (Wimbledon Town Centre)

Our client generally supports the aims of the policy, which seeks to ensure that Wimbledon continues to be a thriving destination for businesses, local residents and visitors. This includes encouraging development that attracts visitors and tourism to the area all year round including high quality hotels, conference facilities and cultural activities.

Our client also supports the aspiration for further hotel accommodation in Wimbledon (paragraph 3.6.19).

Policy D5.1 (Placemaking and Design)

The policy includes criteria f) which relates to tall buildings. Our client supports the principle of locating tall buildings within Wimbledon Town Centre, albeit there is ambiguity over what could be classed as a tall building. It is recommended that the policy provides greater clarity in this respect.

Policy Ec7.1 (Economic Development)

Criteria c) i-iii appear to be a single criterion and therefore should be amended accordingly. Notwithstanding this and for consistency with national policy, the reference to 'town centre type uses' should instead refer to 'main town centre uses' as set out in the NPPF (Annex 2) and which would include hotels. There is ambiguity as to what would constitute 'a large number of trips' and for the avoidance of doubt this requires clarification or deletion.

Policy Tc7.7 (Protection of Shopping Facilities within Designated Shopping Frontages)

Our client generally supports the policy, albeit recommends that reference to protection of frontages relates only to the ground floor of buildings, in order to avoid any ambiguity over the use of upper floors.

Policy Tc7.11 (Culture, Arts and Tourism Development)

Our client welcomes the support for additional tourist accommodation in the Borough as set out in paragraph 7.11.8. Paragraph 7.11.10 refers to the determination of locations for hotels, in particular locations with good



public transport services. However, this should be expanded to explicitly refer to town centres, reflecting the fact that hotels are 'main town centre uses' under the NPPF, which are directed to town centres in the first instance in line with the sequential approach.

Summary and Conclusion

Reef Estates Ltd welcomes the proposed allocation of the site for development, to include a hotel. A number of amendments are recommended to the site allocation in order to ensure that the plan can be found 'sound', including specific support for a range of Class A uses. A number of recommendations are made in relation to other polices in order to achieve soundness.

We trust that these formal representations will be afforded the appropriate weight by the LPA and assist in the formulation of the emerging Local Plan.

We would be grateful if you can keep us updated of any further stages of consultation so we can provide comments as may be required.

Should you require any clarification or additional information, please do not hesitate to contact Alistair Ingram or Tim Price at these offices.

Yours faithfully

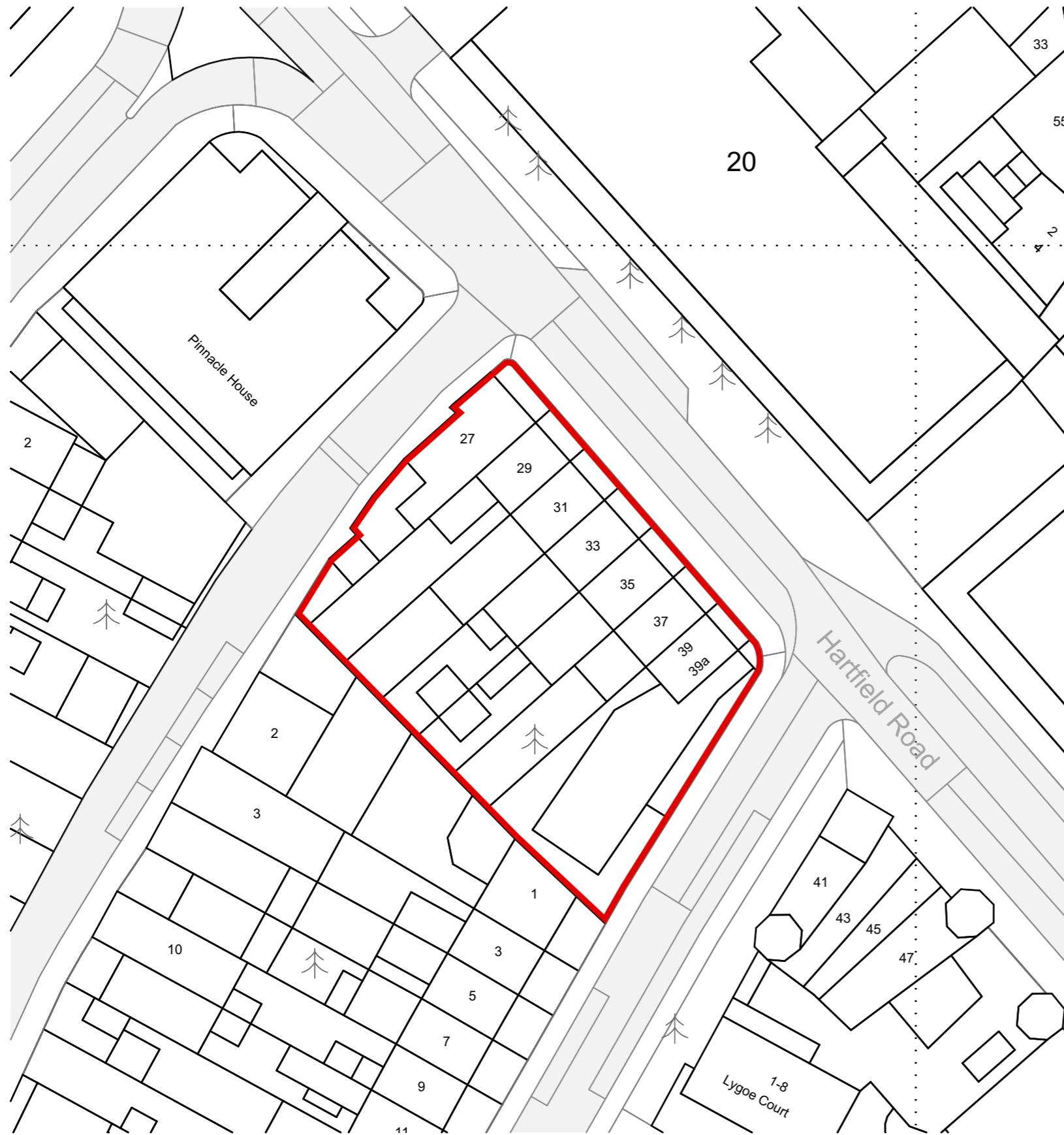
A handwritten signature in black ink, appearing to read "Savills", written in a cursive style.

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cc. W Rohleder- Reef Estates Ltd

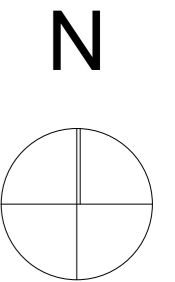
Encs Appendix 1 – Site Location Plan

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HOTEL - SITE LOCATION PLAN