

our ref: TR/Q60495  
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date: 8 January 2018



The Planning Policy Team  
Future Merton,  
Merton Civic Centre,  
London Road,  
Morden,  
SM4 5DX

**By Email**

Dear Sir/Madam,

**REPRESENTATIONS TO THE LONDON BOROUGH OF MERTON 'CALL FOR SITES'  
TRAVIS PERKINS, 50-54 MORDEN ROAD, MITCHAM, SURREY  
SUBMITTED ON BEHALF OF TRAVIS PERKINS PLC**

We are instructed by our client, Travis Perkins Plc ('TP'), to put forward their Travis Perkins builders' merchants site at Travis Perkins, 50-54 Morden Road, Mitcham ('the Site) to the current 'Call for Sites' consultation.

Our client is the long term leasehold occupier of the Site which have an established *sui generis* builders' merchant use which these representations seek to protect.

**a) Site Context**

This is a 0.5 hectare site located on the northern side of Morden Road approximately 1km north west of Mitcham Junction National Rail Station and 1km south of Mitcham town centre. The 'Sutton to London Victoria and London Blackfriars' rail line runs along the northern boundary. Access to the site is gained off Morden Road. Commercial units adjoin the Site to the east and west whilst the wider area is largely residential in character. Ravensbury Park and Ravensbury Medical Centre are locate 200 metres to the south west.

**b) Background**

Travis Perkins is the long term leaseholder of this site on Morden Road, which is within the London Borough of Merton. The branch is a successful builders' merchants and TP therefore have no short term intentions to vacate the site. However, the Site is underutilised in relation to its sustainable location and would be suitable for intensification either for a more modern builders' merchant or for a modern mixed use builders' merchant / residential redevelopment. A mixed use development would be in line with the emerging policies of the draft London Plan (December 2017) which promotes mixed industrial / residential sites.



Furthermore, the existing use of the Site as a builders' merchant is not currently protected and the existing occupier and employment generating use could therefore be lost if the land owners decides to redevelop the Site in the future.

Builders' merchants provide an essential service to London's construction industry, providing access to building materials and helping London to build. Builders' merchants operate under a *sui generis* use. This means that they are often not protected to the same extent as traditional employment uses in the B classes. Many builders' merchants are therefore being lost or are at a high risk of loss to residential, retail and office uses throughout the city

The primary purpose of these representations is to ensure that the builders' merchant use is protected in the next version of the LB Merton Local Plan. If the Site was to come forward for redevelopment, the builders' merchant use should continue to operate alongside any other use for which the Site is considered to be suitable (such as residential). The current Policy DM E1 allocates the Site within an industrial area, however the policy text confirms that this protection is only afforded to B Class uses. The existing *sui generis* use therefore has no current policy protection.

As such, TP is seeking for this site to be allocated either for *sui generis* builders' merchant or *sui generis* builders' merchant / residential use which will ensure that the builders' merchant is protected if the freeholder decides to redevelop the land for an alternative use in the future.

Travis Perkins have carried out this type of development on other sites throughout London.

### c) Policy Context

Paragraph 14 of the NPPF requires LPA's to seek out opportunities to meet their development needs and to prepare flexible plans that can rapidly adjust to change.

At paragraph 20, the NPPF seeks to ensure that Local Authorities proactively support the development needs of business and at Paragraph 21 advises that Local Plans should:

**“support existing business sectors, taking account of whether they are expanding or contracting”**

Furthermore, Local Planning Authorities should ensure that planning policies should:

**“avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities” (our emphasis)**

In terms of housing, the NPPF requires local authorities to identify sites which are available now and have a realistic prospect of delivering. The NPPG advises that the policies within a Local Plan must be based on a

clear and deliverable vision and ensure that the Local Plan vision for the area is realistic. The NPPG advises that draft policies should be deliverable, stating:

**“Development of plan policies should be iterative – with draft policies tested against evidence of the likely ability of the market to deliver the plan’s policies, and revised as part of a dynamic process”** (our emphasis)

At a London level, the Mayor’s Land for Industry and Transport SPG (September 2012) emphasises the need to protect existing industrial sites but also promotes a mixed-use approach to redevelopment with the use of careful siting, design and access arrangements to prevent any conflict of future occupiers. The London Plan supports the protection of London’s industrial land, but also allows for the release of sites if it will contribute to wider local planning objectives (such as contributing to the city’s housing numbers). Policy 4.4 places emphasis on the need to manage the release of industrial land stating:

**“The Mayor will work with boroughs and other partners to:**

**a) adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space**

**b) plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal”**

The London Plan emphasises the need for industrial sites to remain in London in order to provide necessary services to local businesses with an evidence based approach promoted to reconcile demand and supply of industrial land and related uses.

The Draft London Plan (December 2017) which is currently published for consultation until March 2018, provides further support for the protection of existing industrial land but also promotes mixed industrial / residential uses.

Draft Policy E4 addresses land for industry, logistics and services to support London’s economic function. Part B of this policy would allocate this site as ‘non-designated industrial space’. Part C of this policy sets out that retention of this non-designated floorspace should be managed, seeking to ensure that there is no net loss of industrial floorspace in London. Part D of this policy states:

**“Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure”** (our emphasis)

Indeed Table 6.2 of the Draft London Plan specifically identifies Merton as a borough which should seek to retain its industrial floorspace.

Policy E7 promotes the intensification, co-location and substitution of land for industry, logistics and services. Part D of this policy focusses on non-designated industrial sites, stating that mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where (*inter alia*):

**“Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.”**

Parts E.2 to E.4 state that mixed use development must ensure that the industrial uses are not compromised in terms of their continued function, that these uses are completed and operational prior to the residential element of a development being occupied and that mitigation measures must be incorporated to protect neighbouring amenity.

Policy E7 of the draft London Plan is supportive of the allocation of the Site for mixed *sui generis* builders' merchant and residential use. The Site should be considered for a mixed *sui generis* builders' merchant use and residential development to protect this use going forward.

It is with this in mind that TP are seeking to ensure that their business interests are protected whilst also not ruling out assisting in providing much needed housing in London. TP has already demonstrated, on a site in the heart of Camden, that this type of mixed-use redevelopment is feasible, with a builders' merchant and residential units successfully functioning on the same site.

#### **d) Suitability of the Site for Mixed Use Redevelopment**

Travis Perkins' branches have been successfully incorporated into mixed-use schemes in London, including at Battersea Park Road in Wandsworth and St Pancras Way in Camden, which shares some similarities with the TP site on Morden Road, put forward within these representations.

The TP branch on St. Pancras Way successfully operates as a fully operational TP builders' merchant, including an external yard area, alongside a 560 bed UNITE student accommodation development. In 2011, TPP and UNITE worked with Camden Council to realise the mixed-use development which helped regenerate a Zone 1 site in the heart of Camden for residential uses whilst also maintaining important local jobs. The Battersea Park Road development incorporates a number of flats in a five storey building including a 'One Stop' Travis Perkins on the ground floor. This demonstrates how an existing TP branch can be retained and also form part of a redevelopment proposal and this is the type of opportunity that could be realised in Kingston if needed.

It is imperative that, if the existing builders' merchant is protected, but the Site could be allocated for mixed use development in a future Local Plan, so long as the builders' merchant use is retained as part of any redevelopment. This Site should not come forward without certainty that the existing builders' merchant use and associated jobs will be protected. Residential development can be designed into a modernised builders' merchant scheme with mitigation measures, particularly in regard to noise and transport matters in place.

As such, TP is seeking that this site is protected/allocated for:

1. Single *sui generis* builders' merchant use; and/or

2. Mixed *sui generis* builders' merchant and residential use.

A mixed use redevelopment of this site for builders' merchants / residential use would protect the existing local jobs at the site. It would also create additional jobs both at construction and operation phase in the future as well protecting an important local service to the trade, whilst intensifying the use of a brownfield site and boosting the supply of housing in the borough.

f) **Conclusion**

The existing builders' merchants is a successful branch of the company and TP has no plans to relocate from this Site. However, TP is seeking to ensure that the builders' merchant use is protected whilst also highlighting to the Council that the Site could be allocated to accommodate housing if the Site came forward for mixed use builders' merchant / residential redevelopment. We would be grateful if you would keep us informed of the progress of the documents in which this Call for Sites relates.

Should you have any questions or wish to discuss the future of this site, please do not hesitate to contact us.

Yours faithfully,



Tim Rainbird  
Director

Enc.

cc: Travis Perkins Plc



DOCUMENT 1

SITE LOCATION PLAN



## Call for Sites Survey

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

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

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

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

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

### **1. Please provide the following:**

Site address:

Postcode:

### **2. Please upload a site location plan**

(Please attach any documents to your response)

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

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

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

*Mixed use: protected sui generis builders merchant and / or sui generis builders merchant with residential allocation*

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

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

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

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

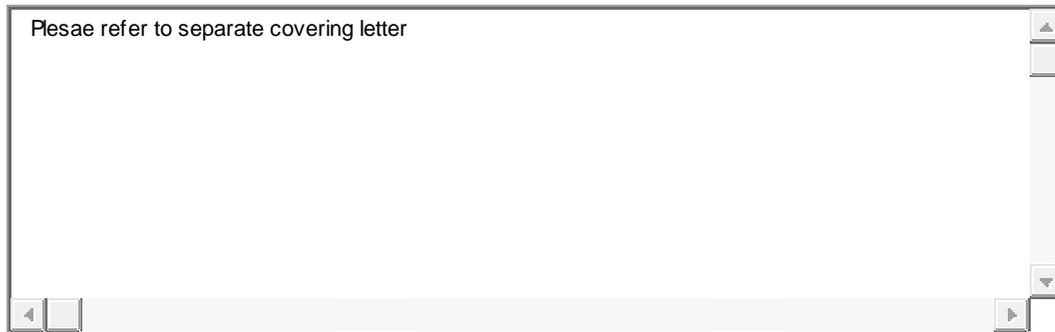
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**8. Are there any factors which might help or hinder this site coming forward as you propose? Please tick all that apply.**

- Land in other ownership; site must be bought before development can take place
- Current use needs to be relocated

- Physical constraints (e.g. access, trees, other)
- Issues with viability (e.g. lending availability, contamination and other financial implications)
- Restrictive covenant exists
- Please use the box below to tell us more (optional)

Please refer to separate covering letter



**9. What is the level of developer interest?**

- There is a landowner/developer who wants to build the site
- The landowner wants this to happen but is yet to appoint a developer
- I do not know
- This is not relevant
- Please use the box below to tell us more (optional)

Please refer to covering letter

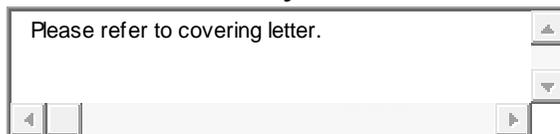


**10. Please indicate the approximate timescale for availability**

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

**11. Please tell us any other relevant information**

Please refer to covering letter.



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

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

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

Name

Address

Address 2

City/Town

Postal Code

Country

Email Address

Phone Number

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

Owner of (all or part of) the site

Land agent

Developer

Registered social landlord

Planning consultant

Community group

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

Yes

No

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

Site owner name

Company (If applicable)

Address

Address 2

City/Town

Postal Code

Country

Email Address

Phone Number

**16. What is your client's address**

Your clients name

Company (If applicable)

Address

Address 2

City/Town

Postal Code

Country

Email Address

Phone Number

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

Yes

No

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

Email

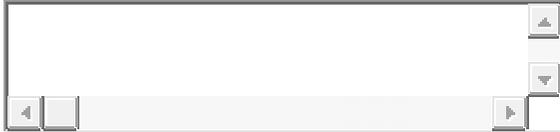
Letter

Website

Newspaper

Other (please specify)

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

A rectangular text input field with a light gray border. On the right side, there are two small square buttons with upward and downward arrows, indicating a scrollable area. The field is currently empty.

**20. Please upload any additional documents that you think are relevant.**

(Please attach any documents to your response)

Thank you for taking part in this survey.

Your responses will help shape the future of your borough.

For future information and future updates on the New Local Plan

[www.merton.gov.uk/newlocalplan](http://www.merton.gov.uk/newlocalplan)