

Our ref: TR/Q60495

Your ref:

Email: tim.rainbird@quod.com

Date: 28th January 2019



Planning Policy Team
London Borough of Merton
Merton Civic Centre
London Road
Morden
SM4 5DX

By email

Dear Sir/Madam,

Merton New Local Plan 2020

Stage 2 Preferred Options Consultation (Regulation 18)

Representations submitted on behalf of Travis Perkins (Properties) Limited

We are instructed by our client, Travis Perkins plc (TP), to submit the enclosed representations to the London Borough of Merton New Local Plan 2020 (Regulation 18). Our client has two builders' merchants (*sui generis*) the Borough at Morden Road ('TP Mitcham') which they own part freehold part leasehold of, and Weir Road ('TP Wimbledon') which is leased. TP Wimbledon is on safeguarded land which is likely to be needed for future Crossrail development and TP Mitcham is currently located on Strategic Industrial Land.

We set out below our interest in the emerging planning policy in Merton, addressing the relevant employment policies contained within the New Local Plan Regulation 18 (Preferred Options) consultation.

Details of the branches are outlined in the table below for ease.

TP Branch	Address	Existing Allocation	Ownership
TP Mitcham	50-54 Morden Road, CR4 4GL	Strategic Industrial Location	Freehold/Leasehold
TP Wimbledon	9 Weir Road, SW19 8UG	Locally Significant Industrial Area	Leasehold

1 Background

Builders' merchants provide an essential service to London's construction industry, providing access to building materials and helping London to build. It is becoming a worrying trend that a number of builders' merchants are being lost to residential, retail and office uses throughout the capital due to their higher land values.

TP is aware that many of their sites throughout London are in strong locations with redevelopment potential. To this end, TP is seeking to protect its sites with a *sui generis* builders' merchant use. Where a TP site is



need of modernisation or intensification and suitable for redevelopment, TP is promoting the integration of the operation within redevelopment proposals, so long as the builders' merchant use is protected going forward.

2 Regulation 18 Plan

Draft Policy Ec 7.2

Draft employment policy Ec 7.2 'Employment Areas in Merton' supports redevelopment of employment sites so long as existing employment land and floorspace is retained. "Employment land" in this instance refers only to the B Classes. This policy offers no support for existing businesses or occupiers and in particular no support to existing employment generating *sui generis* uses.

Whilst TP support redevelopment and modernisation / intensification of their sites where appropriate, the existing builders' merchants along with other important non-B class service providers must be protected. Policy Ec 7.2 as currently drafted does not provide sufficient protection for existing businesses that fall outside of the B use classes.

We suggest the below amendments to Policy Ec7.2 at parts 'a' and 'd' to ensure protection of non-B Class employment uses.

Proposals relating to employment sites will be supported where they:

*"a) Retain the existing lawful employment use 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 and *sui generis* employment uses such as builders' merchants) where suitable space is provided to ensure retention of the existing occupier on site or relocation to an agreed alternative site within the vicinity, unless otherwise agreed in writing by the existing occupier;..."*

*...d) Provide research and development (B1[b] Use Class), light industrial (B1[c] Use Class), general industrial (B2 Use Class), storage and distribution (B8 Use Class) and other similar *sui generis* employment generating uses in Merton's Strategic Industrial Locations and Locally Significant Industrial Sites."*

This additional text will ensure that existing non-B class businesses are protected with suitable replacement floorspace provided so that they can continue to operate from the site when it is redeveloped, or on a suitable nearby site within the same catchment.

Glossary

A glossary has not been provided within the draft Merton New Local Plan 2020 (Regulation 18); any future glossary definition of employment land / employment uses should not be limited to the B Classes and should include *sui generis* employment generating uses.

We suggest the following definition for 'Employment/Industrial Land or Uses':



"Uses operating from business (Class B1), industrial (Class B2), storage/distribution (Class B8) and sui generis uses of an industrial nature purposes."

This will remove any doubt of the uses referred to within the employment policies.

3 Existing Travis Perkins Sites

TP Wimbledon (Weir Road)

This is a successful branch which will continue to operate as a Travis Perkins builders' merchant. This branch is located on safeguarded land which may be required for the development of Crossrail 2.

However it is not clear when or if Crossrail 2 will come forward and the existing use should therefore be protected in the emerging Merton Local Plan.

TP Mitcham (Morden Road)

Our client is currently the part freehold and part leasehold owner of this site. The branch on Morden Road is also a successful branch and one which TP will operate from in the long term. TP is therefore seeking full protection for the existing lawful *sui generis* builders' merchant use on site.

The site is in a sustainable location and may be suitable for intensification either for a more modern builders' merchant or for a modern mixed use of uses to include a builders' merchant alongside other uses.

As such, TP is seeking policy support either for a *sui generis* builders' merchant or *sui generis* builders' merchant / residential use which will ensure that the builders' merchant is protected. Travis Perkins have carried out this type of development on other sites throughout London.

4 Summary

Future employment policies should seek to ensure that existing businesses are fully protected on all employment generating sites. This will ensure that employment generating uses, such as *sui generis* builders' merchants, will be fully protected from forced relocation and will allow them to be incorporated within mixed use redevelopments.

TP need to ensure that their current sites are protected from redevelopment for higher value uses. If the builders' merchant uses or other employment uses are protected at ground floor level, any future mixed use redevelopment can incorporate the builder's merchant. This is in line with the policies within the London Plan as well as the NPPF which encourages LPA's to seek out opportunities for redevelopment and to not hinder development opportunities.

Should you have any questions or wish to discuss these representations, please do not hesitate to contact me.



Yours faithfully,

Director

enc.

cc. Travis Perkins (Properties) Limited