

**REPRESENTATIONS IN RESPONSE TO THE LONDON  
BOROUGH OF MERTON STAGE 2 CONSULTATION DRAFT  
LOCAL PLAN OCTOBER 2018**

**FOR WANDLE WAY LIMITED**

**IN RESPECT OF RUFUS BUSINESS CENTRE,  
RAVENSBURY TERRACE, WIMBLEDON PARK, SW18 4RL**

**IN SUPPORT OF POTENTIAL ALLOCATION OF LAND FOR  
MIXED USE DEVELOPMENT INCLUDING BOTH  
EMPLOYMENT AND RESIDENTIAL DEVELOPMENT**

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## 1. INTRODUCTION

- 1.1 This Statement is submitted in response to the **Stage 2 Consultation Draft London Borough of Merton Local Plan (October 2018)** and with particular reference to the proposed allocation of **Site Wi7 - Rufus Business Centre, Ravensbury Terrace, Wimbledon Park, SW18 4RL**, identified within **Policy N3.6 Wimbledon** as a potential development site.
- 1.2 Representations on behalf of the previous landowner, Astranta General Partner Ltd, were submitted by Carter Jonas on 5<sup>th</sup> January 2018 in response to the previous Call for Sites Representation: New Local Plan 2020. Our client, Wandle Way Limited, has recently purchased the site and these representations are submitted on their behalf.
- 1.3 This statement **describes the representation site and its context** in **Section 2**.
- 1.4 The **Draft Local Plan position**, including reference to the Draft London Plan position is summarised in **Section 3**.
- 1.5 In **Section 4**, the **case for allocation** is set out with reference to planning policies and other considerations.

## 2. DESCRIPTION OF THE REPRESENTATION SITE AND ITS CONTEXT

2.1 The representation site Wi7 extends to approximately 0.2 hectares of land currently occupied by a number of commercial buildings mainly in storage/distribution and office use. An extract from **Policy N3.6 Wimbledon**, which shows the location of the site, is below.



2.2 The existing buildings on the site are arranged within three blocks and range between two and three-storeys in height. Within the centre of the site are parking and turning facilities.

2.3 Access into the site is directly off Ravensbury Terrace to the north and runs through the now vacant Haslemere Industrial Estate, which has a resolution to grant planning permission (ref: 16/P2672) for a mixed-use redevelopment consisting of 1,176 sqm of commercial floorspace and 129no. dwellings.

2.4 To the east of the site is an adjacent railway line and to the west the site is bounded mostly by the gardens of residential properties on Dawlish Avenue, although these are separated by an alleyway which runs between them and the site.

- 2.5 To the south of the site is Durnsford Recreation Ground, a telecommunications tower and group of industrial buildings (Wellington Works) in Wellington Road. A recent application (ref: 17/P1400) was refused and dismissed at appeal for the re-development of 1-3 Wellington Works however it is important to note that the principle of residential development at that site was accepted by the Council.
- 2.6 The site is situated near to the northern boundary of Merton Borough, close to the Borough of Wandsworth.

### 3. PLANNING POLICIES

3.1 The existing planning policy context is set by the **National Planning Policy Framework (NPPF)** and the following Regional and Local Development Plan documents:

- **The London Plan 2016** (*consolidated March 2016*)
- **South London Waste Plan 2012** (*adopted March 2012*)
- **Merton Estates Local Plan 2018** (*adopted February 2018*)
- **Merton Sites and Policies Plan and Policies Maps** (*9 July 2014*)
- **Merton Core Planning Strategy 2011-2016** (*adopted July 2011*)

3.2 **The London Plan 2016** sets out at Table 3.1 a minimum ten year housing supply target (2015-2025) for Merton of **4,107 dwellings**, at an average of **411 dwellings per year**.

3.3 Information contained within **Figure 2** (*Merton's Housing Completions by Permission Type 2006-2016*) of the **Stage 2 Consultation Draft London Borough of Merton Local Plan (October 2018)** sets out the net gain of dwellings that Merton has achieved in comparison to the London Plan 2016 targets. An extract from **Figure 2** is below:

Year	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17
<b>London Plan Target</b>	430	370	370	370	320	320	320	320	320	411	411
<b>Net Gain</b>	388	655	773	332	359	470	460	461	469	631	436
<b>+/- London Plan Target</b>	-42	+285	+403	-38	+39	+150	+140	+141	+149	+220	+25

3.4 The information contained within **Figure 2** confirms that Merton has exceeded its annual London Plan 2016 targets on nine of the previous eleven occasions.

3.5 **The Draft London Plan 2017 Policy H1** proposes that Merton's minimum ten year housing completions target for the period 2019/20–2028/29 should be

**13,280 dwellings**, at an average of **1,328 dwellings per year**. This is a significant increase above the current London Plan target.

3.6 **Policy H1** goes on to state that with regards to the ten-year targets for net housing completions for each local planning authority *“Boroughs must include these targets in their Development Plan documents”*.

3.7 **Strategic Policy LP H4.2** of the **Stage 2 Consultation Draft London Borough of Merton Local Plan (October 2018)** sets out that Merton will work with housing providers to facilitate the provision of a minimum of **6,165 additional homes (dwellings)** for the period 2020-2035. This equates to the current London Plan target of **411 dwellings per year**.

3.8 The supporting text to **Strategic Policy LP H4.2** states at Paragraph 4.2.15 that:

*“The Draft London Plan housing target of 228% proposed for Merton will be unrealistic to achieve, despite Merton being pro-growth. For a decade Merton have been allocating sites of any size i.e. no minimum small sites threshold and has taken forward initiatives including town centre regeneration, estate regeneration and modular construction of affordable homes. Despite this there are a number of factors outside of local planning authority control that influence housing delivery including macroeconomics, house prices, land values, investment confidence and finance availability”*.

3.9 Notwithstanding this, it is clear that the approach that Merton is taking within the Draft Local Plan (October 2018) by proposing to provide a minimum of **6,165 dwellings** at a rate of **411 dwellings per year** will fall significantly short of the requirements of the Draft London Plan 2017 to provide **13,280 dwellings** for the period 2019/20-2028/29 at a rate of **1,328 dwellings per year**.

3.10 Whilst the Draft London Plan 2017 has not yet been adopted, its Examination in Public commences on the 15<sup>th</sup> January 2019 with the sessions in relation to *“Housing Supply and Targets”* taking place on the 8<sup>th</sup> and 11<sup>th</sup> February 2019. In its current form the Draft London Plan 2017 sets clear housing requirements for the Borough and therefore Merton should be positively preparing the Draft Local Plan to ensure that it is able to ensure that these housing requirements can be achieved.

- 3.11 It is therefore respectfully suggested that Merton will be unable to rely on setting a housing target that does not exceed the current London Plan 2016 requirements, as this approach would result in a shortfall of approximately **7,115 dwellings** for the period and only provide for approximately **46%** of the proposed housing requirements of the Draft London Plan 2017 for the Borough.
- 3.12 It is apparent that in order for Merton to meet the Draft London Plan 2017 housing requirements, that the Council should be identifying a significant amount of additional housing land to be provided in the right place.
- 3.13 **Policy N3.6 Wimbledon** of the Draft Local Plan (October 2018) identifies **Site Wi7 – Rufus Business Centre, Ravensbury Terrace, Wimbledon Park, SW18 4RL** as a potential development site.
- 3.14 The Council's proposed site allocation is specified as follows:
- “Employment led development: Business/light industrial (B1) or a suitable employment led redevelopment to be developed in conjunction with the neighbouring site sharing the entrance (Haslemere industrial estate – site 70 in Merton's Sites and Policies Plan 2014”.*
- 3.15 The following **Section 4** will seek to demonstrate that it would be appropriate for Rufus Business Centre to be allocated as a mixed-use development consisting of both employment (business/light industrial B1) and residential uses.

#### 4. THE CASE FOR ALLOCATION

- 4.1 **Policy H1B(1)** of the **Draft London Plan 2017** requires that in order to ensure that ten-year housing targets are achieved boroughs should prepare deliver-focused Development Plans which *“allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification”*.
- 4.2 **Policy H1B(2)** of the Draft London Plan 2017 goes on to outline that boroughs should *“optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions”*.
- 4.3 **Strategic Policy LP H4.2** of the **Stage 2 Consultation Draft London Borough of Merton Local Plan (October 2018)** states that the Council will *“support the provision of well-designed new homes located to create socially mixed and sustainable neighbourhoods”* and will *“work with housing providers to facilitate the provision of a minimum of 6,165 additional homes for the period 2020-2035”*.
- 4.4 Notwithstanding the argument already set out in **Section 3** regarding the shortfall in the housing requirement numbers that Merton are proposing and how these are considered to be insufficient, it is considered that the wording of **Policy N3.6 Wimbledon** should be expanded in relation to **Site Wi7** and allow for a mixed-use development on the site, incorporating residential, in order to assist with the objectives of the delivering the Council’s housing requirements.
- 4.5 Site Wi7 is considered to be suitable for both employment and residential development for a number of reasons:
- The comprehensive redevelopment of the site to provide both employment and residential uses would maximise the development potential of the site, making the most efficient use of a brownfield site, whilst at the same time respecting the character of the immediately surrounding area, including both the existing and proposed residential and employment uses.

- The adjoining site, Haslemere Industrial Estate, will be redeveloped to provide a significant amount of new Class B1 office space, including co-working and traditional office space, as well as 129no. residential units. Development of the Rufus Business Centre for similar purposes would provide both much needed housing, as well as the opportunity to rationalise the existing employment offering, making it more efficient, whilst potentially allowing for more intensive occupation than the current arrangement allows.
- The redevelopment of the Rufus Business Centre would allow for a comprehensive approach to addressing contamination remediation and flood risk mitigation across both the site and the adjacent Haslemere Industrial Estate.
- The site is in a highly sustainable and easily accessible location by public transport, located within 600m (8 minutes walking distance) of Earlsfield Rail Station, and has a 'Good' Public Transport Accessibility Level (PTAL) of 4. Local bus stops are also within 500 metres of the site within walking distance.
- There are a number of local shops and facilities within 400m of the site on Penwith Road as well as Garratt Lane (A217) approximately 600m away. Similarly to the west of the site is Durnsford Road/Merton Road (A218) which is also approximately around 7 minutes walking distance which provides a wide range of shops and facilities.
- The redevelopment of the site creates the opportunity to replace the existing buildings on the site, which are of little architectural merit, and with a high-quality, contemporary scheme which will enhance the overall appearance of the area and respect the context of both existing and future neighbouring buildings.
- The redevelopment of the site for residential purposes would not only assist with meeting the Council's objectives for new market housing but would also provide much-needed affordable housing – a key objective of both Local and Regional policy.

- Residential redevelopment of the site would be able to be accommodated without adverse impact upon the residential amenity of neighbouring occupiers of properties in Dawlish Avenue or on the Haslemere Industrial Estate, once redeveloped, in terms of sunlight, daylight or overshadowing.
- The opportunity to rationalise the existing employment offering and the provision of office uses on the site would potentially remove the need for larger HGV vehicles to access the site, avoiding the need for them to pass through the redeveloped Haslemere Industrial Estate and taking them off surrounding residential roads including Ravensbury Terrace.
- Residential development of the site would allow for either the provision of additional on-site open space (play space) or financial contributions to other off-site open space as well as exploring opportunities for pedestrian access from the site towards Durnsford Recreation Ground (subject to land ownership) and potentially financially contributing towards the Wandle Trail, where justified. Development would also be liable to pay CIL which will contribute towards investment in local infrastructure, including Crossrail.
- Despite the location of the site within Flood Zones 2 and 3, development would be able to be made safe for future occupants, with residential accommodation able to be provided on the upper floors and commercial floorspace on the ground floor, subject to final design detail. This approach would be similar to that accepted by the Council on Haslemere Industrial Estate.

4.6 We would submit that the above assessment shows that there are a number of factors that would make **Site Wi7** a suitable and developable site for residential and employment development.

4.7 Finally, without the allocation of more sites the Council will potentially fail to identify a sufficient supply and mix of sites to meet the housing needs across the plan period.