

Our ref: NJP/SW/45

PSA PEUGEOT CITROËN

Legal, Property & Insurance

27th February 2013

Strategic Policy and Research
Future Merton
London Borough of Merton
12th Floor Civic Centre London Road
Morden
SM4 5DX

By Email: ldf@merton.gov.uk

Dear Sirs

Robins & Day, 242 Morden Road, Morden SW19 3BZ

We write in response to the Council's current consultation on its Sites and Policies DPD with specific reference to Policy DM E3: Protection of scattered employment sites.

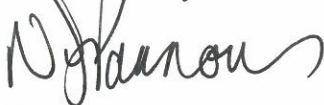
In particular, we consider that the policy as drafted, does not provide sufficient flexibility to assess proposals for development on their merits. The policy appears to require all three limbs to be satisfied before consideration can be afforded to alternative uses. In a reflection of regional and national guidance, the policy should be revised to require only one of the three limbs to be satisfied.

Where sites are unviable for continued employment use, they should be released for beneficial and viable use (in accordance with the definitions at paragraph 173 of the NPPF). The draft policy wording should also make clear that marketing for 2.5 years is only one way in which it can be demonstrated that there is no realistic prospect of employment use.

The reference to community use is unnecessary and implies that all employment sites are either suitable or appropriate for community uses. Community uses should be assessed against other policies of the draft Local Plan.

We trust that this representation will be given due consideration and look forward to being notified of future opportunities to comment on the emerging Sites and Policies DPD.

Yours faithfully



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