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date: 29 August 2013



Future Merton  
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Dear Sir,

**26 BUSHEY ROAD - SITE PROPOSAL 77**  
**STAGE 4 PRE-SUBMISSION PUBLICATION: SITES AND POLICIES DOCUMENT**  
**STAGE 3 DRAFT SITES AND POLICIES DEVELOPMENT PLAN 2013**

We now make representations on behalf of our client, Wellsborough Developments Ltd, in accordance with Stage 4 of the emerging Sites and Policies Development Plan Document Pre-Submission Consultation which closes Friday 30<sup>th</sup> August 2013. This follows submission of representations to the Stage 3 consultation of the emerging Sites and Policies DPD.

Against this background, we set out below our comments in respect to the Stage 4 Sites and Policies consultation.

**a) Site Proposal 77 – 26 Bushey Road**

We previously submitted a representation dated 27<sup>th</sup> February 2013 in respect to Site Proposal 77 Former Raynes Park Service Station of the Council's Draft Sites and Policies DPD. This detailed our support for the Council's preferred use of 26 Bushey Road for residential development in accordance with national and local planning policy. Our previous comments remain valid and should be read in conjunction with this representation.

We are pleased to note that Site Proposal 77 has been considered and accepted by Full Council on the 10<sup>th</sup> July 2013 for submission to the Secretary of State without any major alterations. Wellsborough Developments Ltd who have since taken control of 26 Bushey Road, are currently preparing a detailed planning application for the site comprising 17 units including 10 flats and 7 houses.

26 Bushey Road was previously allocated within the Unitary Development Plan (ref 12P) for B1 'Business' use but Merton Council have now varied this use to Class C3 'residential'. This change is consistent with the National Planning Policy Framework (NPPF), which was published in March 2012 and clearly states that Council's should not retain unviable employment allocations. In particular, paragraph 22 states 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.”**

A condition survey of the existing buildings that currently occupy 26 Bushey Road was undertaken in July 2013 following our previous representation; the conclusions of which can be summarised below:-

- There are a total of 14 no. identifiable units and a former Petrol Filling Station (PFS).
- The current age of the units is over 60 years and this far exceeds their designed useful life. While the PFS is of more recent construction, circa 1980's, it is in need of a general overhaul to the external envelope including the plant room cladding.
- The units generally occupy a single terrace cellular structure built from solid loadbearing brickwork and supporting lightweight roofing. The roof finishes were in a very poor state of dilapidation and where leaking, tenants have placed tarpaulin on top.
- Ad hock alterations have occurred over the years to the existing units. These alterations have been generally built in blockwork.
- The units have not been adapted well and are not fit for purpose for current employment requirements.
- There is clear evidence that a number of the plots which are no longer referenced have been demolished from the hard standing areas left exposed.
- Time expired and part occupied.
- Evidence of asbestos cement corrugated roofs. An intrusive asbestos survey of the individual units is currently being carried out.
- The general risk of significant contamination is considered to be moderate to high due to the former and present site usage including a filling station and vehicle workshops.

This condition survey concludes in relation to 26 Bushey Road that the units are beyond economic repair.

In respect to this, redevelopment of the site is not a viable solution due to the high cost and limited returns that this would achieve.

The site configuration and access arrangements make this site unsuitable and unviable for modern employment uses. Indeed the site has benefited from two extant planning permissions for employment uses both of which have lapsed and neither of which were taken by the market. These planning permissions were approved in March 2007 and January 2008 and have therefore existed for over 5 years meeting the relevant test. Additionally, remediation of the site to bring it up to environmental standards will only be realised through appropriate residential development.

**b) Summary**

Wellsborough Developments Ltd support the allocation of the site for residential development and are of the opinion that there is no reasonable prospect for the site being used for employment use.

We request to attend the Examination in public and would be grateful if you can continue to keep us informed of its progression.

We look forward to receiving confirmation that the representations have been duly made and received within the consultation period. Should you have any further queries or require any further information at this stage, please contact Sophia Waugh of Quod.

Yours faithfully,



Ben Ford  
Director