

Future Merton
London Borough of Merton
12th Floor Civic Centre
London Road
Morden SM4 5DX

19452/A3/A1

BY EMAIL

25th July 2012

Dear Sir / Madam

LONDON BOROUGH OF MERTON SITES AND POLICIES DPD – STAGE 2A CONSULTATION

We act on behalf of Waitrose Limited (“Waitrose”) and have been instructed to submit representations to the above DPD consultation.

Waitrose is an important stakeholder in the Borough, with stores in both Wimbledon Town Centre and Raynes Park Local Centre. Waitrose therefore has a keen interest in the appropriate allocation of sites for future retail development in the Borough.

Against this background, we set out below our comments on the Sites and Policies DPD consultation.

National Planning Policy Framework (NPPF) Requirements

The NPPF (paragraph 158) is clear that a Development Plan should be produced on the basis of an adequate, up-to-date and relevant evidence base. The NPPF (paragraph 182) requires Development Plans to be assessed against the tests of soundness, namely whether it is positively prepared, justified, effective and consistent with national policy.

We comment on the compliance of the DPD with the NPPF below.

Site Proposal 37 – Wimbledon Greyhound Stadium

The site is being proposed for retail use in the DPD by Drivers Jonas DeLoitte on behalf of Hume Consulting Ltd.

The DPD notes that the site is within the functional floodplain and has poor public transport accessibility. The DPD also states that the Council’s preferred use for the site is Class B1(c), B2, B8 and / or D2 use. Whilst not explicitly referred to in the emerging DPD, the submitted representations refer to a foodstore being suitable as enabling development for the wider retention / enhancement of the stadium.



The site is in an out-of-centre location and no evidence has been submitted to demonstrate compliance with the sequential test, as required by the NPPF (paragraph 23). It should be noted that the Council's Retail Study identifies sufficient floorspace / sites in Wimbledon Town Centre to accommodate approximately 10,000 sq m gross floorspace up to 2016, and a further 10,000 sq m gross between 2016-2021. This will more than meet the identified convenience goods need. There is no need to identify non-central sites for convenience goods retailing

Given the poor accessibility of the site, a sequential assessment should be undertaken of Town Centre, edge-of-centre and then out-of-centre sites in accessible locations. Drivers Jonas Deloitte acknowledge that this work has not been undertaken and state, *"As such our client would like to work with the Council to test the suitability of a supermarket / foodstore against the sequential and impact tests defined in the National Planning Policy Framework."*

In the absence of a defined retail need (for non-central sites) and a sequential assessment of alternative sites against the NPPF criteria, the proposed allocation of the site for a foodstore fails the tests of soundness (NPPF paragraph 182), in that it is not justified and is not consistent with national policy.

Waitrose therefore requests that the site should not be allocated for convenience retail use and should only be allocated in accordance with the Council's preferred use of Class B1(c), B2, B8 and / or D2 use. Only on this basis will the plan be sound.

Proposals Map Revision - Raynes Park Local Centre

Waitrose supports the proposed boundary of Raynes Park Local Centre.

Conclusions

We trust the above will be taken into due consideration in the formulation of the DPD and would welcome the opportunity to discuss these in more detail. In addition, please can you advise us of any future LDF consultations.

Yours sincerely