

6 September 2021



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Dear Sir or Madam

Merton Local Plan 2021 Stage 3 (Regulation 19) Public Consultation Representations

Raynes Park Site Allocation RP6: Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB.

These representations are submitted by Savills on behalf of our client, Bellway Homes Limited (South London) (Bellway), in response to the London Borough of Merton (LBM) New Local Plan Stage 3 (Regulation 19) consultation.

Executive Summary and Requested Amendment to Raynes Park Site Allocation RP6

These representations are made specifically in response to the proposed Raynes Park Site Allocation RP6: land at the former LESSA Sports Ground (the site). However, representations are also made to other parts of the New Local Plan Stage 3 (Regulation 19) consultation.

This representation objects to the current proposed wording of Raynes Park Site Allocation RP6 as set out in the New Local Plan Stage 3.

It is requested that the allocation of Raynes Park Site Allocation RP6 land at the former LESSA Sports Ground is amended so that Site Allocation RP6 in LBM's New Local Plan allocates the site for the following:

Site Allocation: Residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land, comprising: 2 tennis courts with ancillary facilities including dedicated parking, a small multi-use games area (MUGA), an outdoor gym, a trim trail, walking/jogging routes; together with publicly accessible open space including a new children's play area and landscaping.

Background

The site, the former Lessa Sports Ground, was previously submitted as part of the 'call for sites' in January 2018, promoting the site for residential development. Representations were also made in support of the site's allocation for residential development during the first stage of Regulation 18 consultations held between October 2018 and January 2019 and the second stage of Regulation 18 consultations held between November 2020 and February 2021.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Bellway submitted a full planning application at the site in October 2020 (LPA Ref. 20/P3237) currently seeking to deliver 89 dwellings, including 40% affordable housing, equipped children's play area, outdoor mini-gym and two all-weather tennis courts with associated floodlighting. Discussions regarding the principle of development and design proposals at the site have been ongoing between Bellway and officers.

On behalf of Bellway Homes, this representation is made in support of the site being allocated for residential development. The site is considered as a potential location for housing within Policy Document N6 'Raynes Park', as Site RP6.

Structure of this Representation

This representation provides a brief overview of the site, details of the current full planning application at the site being considered by LBM, and current and emerging policy designation. Throughout this response, we set out why the site is suitable for inclusion in the New Local Plan as an allocated housing site.

The Site

The site is approximately 2.8 hectares in size. It is owned freehold by Bellway Homes. It is located south of Meadowview Road off Grand Drive on the western side in Raynes Park. It currently comprises a fenced off field accessible from Meadowview Road. The original larger site was previously owned by London Electricity used as a private sports facility for members of London Electricity's sports and social club. Due to a declining membership, the facility was closed in September 2000. The unoccupied site is currently secured to protect health and safety and prevent it from falling into disrepair.

The northern half of the LESSA site was developed for 44 homes along Meadowview Road, along with the provision of five tennis courts and a clubhouse for Raynes Park Residents' Lawn Tennis Club, completed in 2013.

The remaining half of the site is bounded on all four sides by residential development. The surrounding properties are predominantly two and three storeys in height. These include semi-detached houses along Meadowview Road and Blenheim Road/Blenheim Close (to the north), Westway (to the west), Greenway (to the south) and Orchard Close/Elm Grove (to the east).

The site is sustainably located and is considered very suitable for residential development. The site has a PTAL rating of 1b and is in very close proximity of PTAL 3 where Meadowview Road meets Grand Drive.

Existing Planning Policy Designations

The site currently has two policy designations under LBM's adopted development plan. Core Planning Strategy Policy CS13: *Open Space, Nature Conservation, Leisure and Culture* and Policy DMO1: *Open Space*. Whilst Policy CS13 looks at protecting and enhancing public and private open space, it also seeks to safeguard viable leisure, recreational and sporting facilities. The policy is supportive of proposals for new and improved facilities. Policy DMO1 also looks at protecting, enhancing and improving access to open space. Residential Development which would enable viable leisure and sporting facilities at the site would not be contrary to these policies.

It is requested that the site is released from its current designations and allocated for residential development for the reasons set out in this representation.

Current Full Planning Application at the Site (LPA Ref. 20/P3237)

A full planning application was submitted by Bellway for the redevelopment of the site and it was validated on 16 November 2020. The current application seek approval of the following:

Redevelopment of part of former Lessa sports ground involving the erection of 89 dwellings, including affordable housing, associated landscaping, equipped children's play area and associated infrastructure, including flood mitigation, vehicular access and parking, plus the erection of 2 all-weather tennis courts with floodlighting, storage compound and parking.

The application was submitted following formal pre-application discussions with LBM officers and several public consultations with residents and local stakeholders. Statutory and non-statutory consultees have provided comments on the live application. Bellway and its team are considering their comments and is looking at making positive amendments to the scheme in response to feedback received. Working with officers, the scheme will evolve further through the planning process to deliver the optimum development whilst considering all pertinent site considerations.

Discussions have been ongoing between Bellway and LBM, with flood and design officers providing comments. In response, Bellway and their consultants have reviewed the proposed masterplan and provided an updated set of drawings. Urban Design officers at LBM recognise the site's potential to deliver housing at a sustainable and existing residential location. Therefore, Urban Design officers have been promoting Bellway to increase the density of development at the site to maximise the potential to deliver housing. The amended optimised layout is to also consider flooding and drainage matters as well as provide open spaces and on-site sporting facilities in the form of an equipped play area, two tennis courts, a multi-use games area (MUGA), outdoor gym, trim trail and communal green-space.

The most recently published draft New Local Plan documents currently being consulted on by LBM demonstrate a direction of travel that the site should be allocated for housing. LBM is to deliver a 'minimum of 11,732 additional homes for the period 2021/22 – 2035/36' (draft Policy H4.2). LBM state in the New Local Plan that it will achieve this housing delivery by supporting the delivery of well-designed new homes on sites which optimise levels of residential density in accordance with the design-led approach set out in the London Plan and Merton's design code guidance. Therefore, to support housing delivery required by the New Local Plan, the focus going forward should look at the delivery of the most appropriate housing scheme at the site. The live planning application provides an excellent opportunity for Bellway to work with LBM officers to deliver the optimum housing scheme at the site.

Emerging Planning Framework

Consultation Policy Document N6 'Raynes Park'

Site Allocation: Site RP6 'Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB'

Bellway strongly supports the site to be allocated for housing in Merton's the new Local Plan.

However, Bellway objects to the current proposed allocation wording and requests amendments to the draft allocation wording to allocate the site for housing and support housing delivery at the site.

Future Merton has published a series of Stage 3 Local Plan documents for consultation, including neighbourhood document N6 'Raynes Park' which includes an overall future vision for Raynes Park to be delivered and supported by the New Local Plan and site specific allocations within the Raynes Park area. The site is identified as Site Allocation RP6: *Land at the former LESSA Sports Ground Grand Drive, Raynes Park, SW20 9EB*.

In the supporting text it states:

Site allocation: *Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered.*

Design and accessibility guidance:

.....

Development of the site may provide opportunities for entire site sports use.

.....

Development proposals for sports use or other uses compatible with the designated open space should be actively demonstrated prior to any alternatives being taken forward.

.....

Development proposals should protect the amenity of surrounding residents.

Infrastructure Requirements:

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This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.

This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.

Ensuring the New Local Plan Allocation of the site is 'Sound'

The NPPF requires Local Plans to be found 'sound' in order to be recommended that the Plan can be adopted (paragraph 35). Of importance, the use of the entire site for a sporting or community use is not supported by the landowner. The evidence provided in this representation below sets out how the site is not deliverable as a sporting or community use. Therefore, the wording of the site's allocation should be amended to remove the requirement to demonstrate that a 'Sporting or community use of the entire site will have to be proven as undeliverable'.

It is demonstrated below that the site is not deliverable as a community or sporting use. Therefore, the New Local Plan would not meet the test of 'soundness' if the LESSA site is allocated with the current proposed allocation wording. This is because the site is not available, deliverable or developable as a sporting or community use. Therefore, amendments are required to the proposed allocation of the site in the New Local Plan to allocate the site for residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land.

Below sets out how the site is not deliverable as a sporting or community use, responding to the wording for the site in the current draft allocation.

■ **Demonstrating that the use of the entire site for sporting or community use is not deliverable**

Site Allocation RP6 sets out that the council's proposed approach to allocating the site for residential development should be done once it is demonstrated that a sporting or community use of the entire site is undeliverable. This does not accord with relevant evidence base to prepare the Local Plan which is the Matron Playing Pitch Strategy (the PPS) (see below) where the PPS required that 'part or all of the site' to not be viably delivered for a sporting use by a 'club or community group'.

The extensive assessments and investigations undertaken by LBM and Bellway, which have included a 12-month marketing exercise (Sept 2019 – Sept 2020), direct consultations with local sports clubs and organisations, national governing bodies of sport and with Sport England, have demonstrated that the use of the entire site for a sporting or community use is not deliverable. This justification was set out in detail in the Sports Needs and Viability Report of October 2020, which was submitted with the planning application (reference number 20/P3237), a copy of which is provided as **Appendix 1**.

Subsequent to Sports Needs and Viability Report, there have been further discussions with LBM officers on sports needs and viability, summarised below.

Merton's Adopted Playing Pitch Strategy

The Merton Playing Pitch Strategy (PPS) was formally adopted by the LBM Cabinet with effect from 14 October 2019 following a resolution by LBM Cabinet to approve and adopt the Strategy. The PPS is the lead policy document that identifies the sports needs across the Borough, and as such informs the opportunities for sport on the site. Given its formal adoption, the PPS policy takes precedence over that of the current stage of the emerging Local Plan.

Prior to its adoption, the PPS was agreed by the steering group comprising LBM, Sport England and the National Governing Bodies of Sport (NGBs) including the Football Association (FA), England & Wales Cricket Board (ECB) and the Rugby Football Union (RFU).

In respect of Merton's new Local Plan, and in the context set for the LESSA site, the PPS states:

This PPS indicates that these sites ... [including Site Allocation RP6] ... should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough.

Merton Playing Pitch Strategy paragraph 5.2.2

The PPS policy sets out that:

- The LESSA site should be subject to an investigation of six months from the date of its adoption, to test if there was a viable and deliverable community or club sports need for the whole or part of the site. That period ended in 14 April 2020.
- The use of the site was to be for a 'club or community use'. It was not intended for commercial leisure use such as 5-a-side football cages, adventure golf, or a private school's sports ground.
- The land use to be considered was for 'sporting use', e.g. by a sports club or a community group wanting a sports site. The PPS therefore excluded general community use, e.g. a community centre without a dominant sporting use.
- That the 'thorough investigation' by the steering group implies direct action to investigate the potential site use for sport by LBM and the national governing bodies of sport in addition to action by the landowner.

Testing the Site for Sporting Use by a Club or for Community Use

There have been a large number of stages in the testing of the PPS policy, and these are summarised in the site chronology table in **Appendix 2** to this letter. The following provides an overview.

In response to the PPS requirements, Bellway undertook a 12 month marketing and consultation exercise between September 2019 and September 2020, led by Haslams with support from specialist sports consultancy Nortoft. The details are provided in the application's Sports Needs and Viability Report, October 2020 (**Appendix 1**).

This consultation and marketing exercise considered various relevant sports uses compatible with the current designation of the site and appropriate to its context, including hockey, rugby, tennis, football and cricket. No viable and deliverable sports use which met the policy tests of the PPS for the whole site came forwards, or were otherwise identified in, the period up to 16 September 2020.

At the specific request of LBM, the site was also required to be more widely marketed to potential commercial sports interests, such as golf driving range and 5-a-side football 'cage' companies, some additional local sports clubs, and other 'late' expressions of interest e.g. private schools. This wider marketing and investigation took place between 16 July 2020 and 16 September 2020. Again, Haslams assessed the proposals received and concluded that no proposal had been submitted which met the tests of the PPS for the whole site. Furthermore, no comprehensive proposals have been presented to Bellway or their representatives since September 2020.

The Raynes Park Residents Lawn Tennis Club (RPRLTC) were however seeking additional court space due to local high demand. As the site could offer space adjacent to the tennis club's existing site this was supported by the Lawn Tennis Association. Therefore, Bellway made a formal offer to RPRLTC, which was formally accepted, to provide two new tennis courts, along with ancillary tennis provision. The details of the tennis courts, ancillary car parking and other ancillary tennis court provision was set out in the detailed planning application submitted by Bellway in November 2020 at the site (App Ref: 20/P3237) and its delivery can be secured as part of a Section 106 Agreement or via condition as part of the submitted residential development. This proposed tennis use at the site meets the PPS test of part of the site being retained for a club or community sport.

In January 2021, Sport England supported the current live planning application at the site with the proposals for on-site tennis provision and significant off-site financial contributions to PPS priority sites close by, the off-site financial contributions to be secured via a S106 Agreement. This reflected the discussions about the site which took place as an item at the annual PPS review meeting comprising the NGBs, Sport England and LBM.

However, in February 2021, following receipt of a letter from the Raynes Park Residents Association who were lobbying against the planning application, Sport England further consulted the NGBs and decided to reverse its previous position and object to the application.

In August 2021, LBM decided to re-consult specific sports and other organisations on their demand for the site. The deadline for responding is 2 September 2021. The results of this consultation have not yet been shared with Bellway.

In summary, to date there have been no evidenced proposals from any club or community group for the purchase and viable delivery of all of the site for sporting use at any time, i.e. none that meet the adopted PPS policy tests.

The proposed RP6 Site Allocation as worded below is therefore not justified:

sporting or community use for the entire site will have to be proven as undeliverable before any other uses can be considered.

Reasons include that:

- no clearly viable and deliverable sports use for clubs or the community has been proven for the whole site;
- the PPS test included sport use on 'part of the site' and this can be met through providing for the clear demand and viably deliverable tennis provision;
- any test needs to be considered in the planning balance and assess the overall benefit to sport and active recreation, both on-site and of-site.

The current proposed allocation of the site in the draft New Local Plan would not meet the test of 'soundness' required by the NPPF. A change to the Site Allocation wording is required to meet the test of soundness and to enable delivery of residential development and on-site tennis provision, a small multi-use games area (MUGA) to meet older children/youth needs, an outdoor gym, trim trail, walking/jogging routes to meet wider community health needs, plus public open space with children's play, which both meet an identified need at

this location.

It is requested the site allocation wording is amended accordingly.

Other Uses of the Site to Support Off-Site Sports Provision

On 24 September 2020, Sport England confirmed that the NGBs, other than for tennis, would prefer any S106 contributions generated by residential use at LESSA to be directed towards existing off-site sports facility priorities in the local area, as identified in the PPS Action Plan. These investment needs include the provision of 3G artificial grass pitches for football, which can be managed to provide for up to 60 hours use a week. Off-site S106 investment would enable the provision of new facilities and the improvement of existing facilities, enabling them to respond effectively to greater demand from a growing population in Merton for a range of sports' needs and as well as supporting their continued viable operations.

The potential benefit of such off-site investment plus the proposed all-weather tennis courts would meet other LBM objectives for health and wellbeing as a large number of people from all backgrounds could be supported to be active. In addition, the proposed public open space with trim trail, walking/jogging routes and MUGA have the potential to be used by everyone living locally.

These wider and multiple benefits that can be delivered through housing at the site which would generate significant financial S106 contributions for off-site sporting uses should be compared to the very limited potential that bringing the whole but constrained site back into sport use can offer. Whether the site is used for pitch sport of football, cricket or rugby, a large majority of players, and therefore users of the site, are male and under the age of 45. The dimensions of the site will limit its use to a single adult pitch or equivalent. If providing for football or rugby on grass, this might have 2-3 hours use a week during the winter months for a maximum of around 100 players. If providing for cricket, this use is likely to be limited to April-September at best and the ECB has already stated that the site is constrained due to its size and surrounding residential properties.

It has been demonstrated the site is not deliverable in its entirety as a viable and deliverable sporting use. This further analysis demonstrates the site is not suitable for many sporting uses and would provide limited benefits to a small number of people if it was to be entirely used for sporting use. The part-use of the site for tennis along with housing that can provide significant financial contributions for off-site sporting use would provide many more benefits to a greater number of people and sports.

Statutory Consultation and Other Referral for Sport

With regard to planning applications at this site and the draft allocation of the site, Bellway re-iterate the following:

Sport England

Sport England is not a statutory consultee for planning applications at the site as (i) the site has not been used as a playing field for more than 5 years, and (ii) the Site Allocation is not specifically for a playing field. Sport England has agreed this status.

Mayor of London

Planning applications at the site do not require referral to the Mayor of London because it the site has not been used as a playing field within the last 5 years. Sport England also agrees with this.

Planning applications at the site are to be determined by LBM. The planning decision is therefore a matter for LBM to be taken in the planning balance.

Site Allocation: Residential Use

The site is sustainably located surrounded entirely by residential development. The most suitable alternative use of the site would be for residential redevelopment with some on site sports facilities plus new public open

space and play provision, which directly respond to the Infrastructure Requirements set out in the supporting text of Site Allocation RP6. Also given that a sporting or community use of the entire site is undeliverable, another use of the site is to be considered. Even if some, constrained, sporting use was eventually found to be potentially viable for the whole site, then this would not be a better use of the site, given the proposed significant benefits to community sport and recreation from the partial development of the site for housing, along with on-site sports, recreation and public open space provision, together with significant off-site S106 financial sports contributions that meet identified local priority needs.

The value of the CIL compliant sporting and recreation investment being proposed by Bellway includes about £367,000 for two new on-site tennis courts, ancillary tennis uses and improvements to the existing tennis courts, and about £640,000 for off-site contributions to playing pitch sports priorities in the local area as identified in the PPS.

These clear deliverable benefits far outweigh any whole on-site sports-only provision that have not be proven as viable or deliverable, and are on land that is not available for such a purpose.

The current live planning application at the site has demonstrated an acceptable scheme of 89 dwellings, along with some viable on-site sporting provision. Whilst the scheme subject to the live application is being further refined in light of consultee comments, with the potential to increase density as guided by comments of Merton's Urban Design Officer to support further housing at this sustainable location, the current planning application provides a comprehensive response demonstrating how redevelopment of the site could come forward whilst protecting the amenity of surrounding residents and meeting the adopted Local Plan and PPS policy tests.

Policy H4.2 of the Stage 3 Consultation sets out that Merton is to deliver 11,732 new homes over the period 2021/22 – 2035/36. As a constrained borough, new homes should be delivered in the most sustainable locations close to existing services and infrastructure. The allocation of the site for residential development would provide the Local Plan with certainty on the delivery of housing from an allocated site. The site would also provide a much needed contribution to Merton's housing land supply.

Therefore, it is requested that the site's allocation in the site reference RP6 in LBM's New Local Plan allocates the site for the following:

Site Allocation: Residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land, comprising: 2 tennis courts with ancillary facilities including dedicated parking, a small multi-use games area (MUGA), an outdoor gym, a trim trail, walking/jogging routes; together with publicly accessible open space including a new children's play area and landscaping.

Addressing Drainage and Flood Risk

The supporting text to Site Allocation RP6 sets out that drainage on the site will have to be improved for any proposals to address the likelihood of fluvial flooding and critical drainage.

The south west corner of the site is located within Flood Zone 3. However, a comprehensive re-profiling of the site is proposed, ensuring all residential accommodation finished floor levels for living and sleeping accommodation will be set above the 100 year plus 35% climate change flood level plus a 300mm freeboard. Further, as part of the site's re-profiling of levels, a flood compensation area within the west and southern areas of the site will provide additional flood water storage capacity. This will provide protection to the site whilst offering significant betterment to the surrounding areas. Additional storage on site has also been provided for the 1 in 20 year flood event which will increase the available functional floodplain and provide betterment elsewhere.

In support of the current planning application, a Flood Risk Assessment and Drainage Strategy (FRADS) has been prepared. The FRADS has demonstrated that the proposals would not be at risk of flooding or increase the flood risk to others as a result of the proposed development.

There have been ongoing discussions with the LBM Flood Officer who is generally supportive of the flooding mitigation approach. Notwithstanding, Bellway's drainage consultant working with the appointed architect has reviewed the masterplan against the required floodplain compensation requirements and made further amendments and improvements.

In addition, Bellway has prepared a Sequential Test to demonstrate that development of part of the site located within flood zone 3a is sequentially preferable to development at other sites in the borough. This will be submitted to LBM with the submission of Bellway's amended scheme.

Therefore, it is considered the proposed development is acceptable in flooding and drainage terms.

Site Deliverability

The site is not suitable, available, deliverable or developable for sporting use.

The site is suitable, available, and deliverable for housing.

The Site Allocation RP6 in the Stage 3 Local Plan Consultation correctly identifies that the site is within one land owner, Bellway Homes. Bellway's current ownership of the land puts them in the position to deliver housing in the first five years of the Local Plan period starting 2021/22. Following the grant of detailed planning permission, Bellway Homes intend to construct the development in a prompt manner, beginning construction and delivering housing at the site within 5 years.

Design Guidance

The supporting text of Site Allocation RP6 states that development proposals should protect the amenity of surrounding residents. It is considered that the redevelopment of the site for residential uses would be a wholly compatible and acceptable land use with the surrounding site context. Subject to careful design, it would not result in inappropriate or unacceptable impacts upon the existing residential amenity of surrounding properties.

Strategic Policy H4.2 'Housing Provision' and Housing Need and Delivery

Following the previous Stage 2 Regulation 18 Consultation, the number of homes to be delivered in the Borough of Merton has increased very significantly. The number of additional homes to deliver for the period of 2021/22 to 2035/36 has increased from 6,165 to 9,180, an increase of 3,015.

In order to meet the increase in housing numbers the Borough is to supply, this site with draft Allocation RP6 would provide a welcome and meaningful contribution to Merton's housing land supply.

Importantly, within the London Plan (2021) the housing need for London has been increased to 52,287 new homes each year. For the London Borough of Merton, the ten year housing target has been increased to 9,180 dwellings, which equates to an annual target of 918 dwellings. Again, it is reiterated that draft Allocation RP6 would make a meaningful contribution of 130 new homes towards meeting Merton's housing targets and allow the site to make a valuable contribution to the housing land supply. It would ensure that Local Plan policies take priority and allow development in Merton to remain plan-led.

Affordable Housing Delivery

The current planning application submitted at the site seeks to provide 40% affordable housing. The delivery of affordable housing is a further significant planning benefit that would result from the allocation of the site for residential development.

Other Allocations

LBM draft New Local Plan Site Allocation Mi14 United Westminster Schools site, Tamworth Lane, is proposed to be allocated for the creation of new publicly accessible sporting facilities enabled by residential development. The allocation notes that the existing use of the site is a vacant former playing field and has a site area of 5.14ha. The former use of the site is comparable to the LESSA site. However, the Tamworth Lane site has the potential to provide significantly more space for sporting and community uses.

In addition, the supporting text to the allocation notes that the consultee has provided evidence of the operation of this site for community uses via hire to local sports clubs for several years. Therefore, it appears that the Tamworth Lane site allocation is more preferable for the development of sport and community uses than the LESSA site. However, the testing undertaken in relation to the LESSA site, although different, is at least as robust as that undertaken for Tamworth Lane.

Summary and Conclusions

The site at land to the south of Meadowview Road, the former LESSA Sports Ground Site, is vacant. It has been demonstrated the site is not deliverable in its entirety as a viable and deliverable sporting use. Therefore, the site should be allocated for another use in the New Local Plan to ensure the Plan is found 'sound'.

The LBM draft New Local Plan currently proposed the former LESSA Sport Ground site is allocated with the following, 'Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered'. As set out in this representation, the site is not deliverable in its entirety as a sporting or community use. Therefore, it is requested that the proposed allocation is amended. An amendment to the proposed allocation is also required to ensure the Plan is found sound.

A residential use of the site is considered the most appropriate alternative land use of the site. It is therefore requested that the site is allocated for residential use together with the provision of new tennis courts, a MUGA and new public open space including children's play provision.

Significantly, the redevelopment of the site for housing could provide S106 contributions for off-site investment into other priority playing field sites in line with the Action Plan of the adopted Merton Playing Pitch Strategy. This would enable new sports opportunities to be offered to a large number of people from many different sectors of the community, supporting health and wellbeing priorities.

The site is strongly supported for inclusion as a housing site in the Merton Local Plan. The site is suitable, available and deliverable for housing. The site can deliver new homes in the first 5 years of the Local Plan period.

Therefore, it is requested that the draft Local Plan Site Allocation for RP6 (Former LESSA Sport Ground) is amended to:

Site Allocation: Residential use to provide the delivery of 130 dwellings together with new publicly accessible sports facilities on the remaining land, comprising: 2 tennis courts with ancillary facilities including dedicated parking, a small multi-use games area (MUGA), an outdoor gym, a trim trail, walking/jogging routes; together with publicly accessible open space including a new children's play area and landscaping.

We would be grateful for confirmation of these representations. Please feel free to contact myself or Gregory Evans (0207 409 8024, grevans@savills.com) of these offices in the first instance if you have any queries or would like to discuss.

Yours faithfully

A handwritten signature in black ink, appearing to read "Kieran Wheeler". The signature is fluid and cursive, with a large, stylized initial 'K'.

Kieran Wheeler
Director

CC. Julian Goodban, Regional Planning Director, Bellway Homes Limited (Kent, South London & Strategic)

Appendix 1: Sports Needs and Viability Report
Appendix 2: Site Chronology Table



Appendix 1: Sports Needs and Viability Report

Copy of the Sports Needs and Viability Report, Nortoft Planning (October 2020) as submitted to London Borough of Merton accompanying planning application Ref: 20/P3237.

Appendix 2: Site Chronology Table

There have been a large number of stages in the testing of the Playing Pitch Strategy policy with regards to the LESSA site, and these are summarised in the site chronology table.