



Merton New Local Plan Stage 3 Publication

Representation submitted on behalf of
CBRE Global Investors

06/09/2021

A11640 GR 0 002 P1

CBRE
GLOBAL
INVESTORS

tp bennett

RPS

1.0 Executive Summary

Section 1 Executive Summary

- 1.1 This representation is submitted on behalf CBRE Global Investors (CBREGI) on behalf of their client, the Verity Trustees Ltd, who own the freehold of land at 33- 34 London Road, Morden. The representation has been prepared in conjunction with TP Bennett and RPS Group.
- 1.2 The site is currently occupied by a Sainsbury's foodstore with offices above.
- 1.3 The site boundary is given in Appendix 1 to this submission.
- 1.4 The sought changes to the Merton New Local Plan to make the plan sound are given in Appendix 2 and Appendix 3.
- 1.5 Appendix 2 seeks the site allocation for a high density, residential led, mixed use development within Morden town centre which will deliver:
 - a. Up to 200 residential units.
 - b. A landmark building of up to 20 storeys high.
 - c. Residential component to comprise of no more than 65% for sale and at least 35% of affordable housing tenures, including 30% affordable rented, 40% low cost rent houses and 30% affordable intermediate.
 - d. Provision for Class E uses.
 - e. Provision of new private and public amenity space for residents.
 - f. Car free development, except for disabled access for residents and Class E uses as per adopted London Plan standards.
- 1.6 Appendix 3 seeks amendments to Morden Policy N5.1 and Site allocation MO4.
- 1.7 CBREGI and their consultant team have assessed the site's masterplanning principles which derive the proposed land use allocation in Appendix 2. The masterplanning solutions which can deliver the site specific local plan allocation for the mix of land uses are described in Section 3. The final masterplanning solution will be based upon extensive public consultation with all stakeholders and subsequent negotiations through a series of pre-application meetings with the Local Planning Authority. The agreed masterplanning solution would then be specified through parameter plans and design codes which would be submitted for planning approval once the site is allocated in the newly adopted Merton New Local Plan.

1.8 This representation is structured in the following manner.

- Section 1: Executive summary
- Section 2 outlines the opportunity presented by CBREGI to regenerate the site to deliver a mixed use, high density residential led town centre development for the mix of uses as given in Appendix 2.
- Section 3 sets out the site's masterplanning principles and gives an assessment as to how the proposed land use allocation given in Appendix 2 can be sustainably delivered.
- Section 4 sets out why the proposed site allocation is supported by policies of the adopted London Plan and National Planning Policy.
- Section 5 sets out why amendments to draft policy N5.1 and policy MO4 as given in Appendix 3 are also necessary in order to make the plan sound.
- Section 6 sets out overall conclusion – namely that the proposed allocation of the site for a mix of uses as given in Appendices 2 and the sought amendments to Section 5 of the Plan as given in Appendix 3 are necessary in order to make the plan sound and so deliver sustainable development.

2.0 The opportunity

Section 2 - The opportunity

- 2.1 This representation is submitted on behalf of CBREGI who are the fund managers for the freeholders of the site at 33 – 35 London Road. The site boundary and existing land uses are given in Appendix 1.
- 2.2 CBREgi are one of the world’s leading real asset investment managers with \$129.1 billion in assets under management. CBREgi are continuously active and seeking ways to maximise performance for their clients with both exceptional performance on a day to day level but with considerable foresight with value enhancement and strategic opportunities. Future proofing current investment is paramount, but also seeking alternative angles for growth.
- 2.3 Direct and indirect investment into real estate is considered frequently, should this be repositioning; development or intensive asset management.
- 2.4 CBREgi is involved in the alternative sector of real estate with the UK being a key market and growth area for the company. Investment into build to rent; offices; affordable housing; retail; student and wider place making are key with the various funds seeking opportunities at every angle. Furthermore, owing to the recent global changes through the pandemic, CBREgi recognises the ways in which people will now work and live and is committed to continued investment to both create long standing communities and environment while also providing returns for its stakeholders.
- 2.5 CBREgi also have considerable experience of funding major mixed use regeneration schemes, working in joint ventures and parternerships with their appointed developer, prospective occupiers - including affordable housing providers - as well as Local Planning Authorities and other stakeholders in order to deliver sustainable development.

3.0 Masterplanning principles

Section 3 - Masterplanning Principles

3.1 Introduction

This section sets out the site's opportunities and masterplanning principles for the redevelopment of the proposed site in terms of the quantity and the mix of land uses as sought to be allocated as given in Appendix 2.

3.2 Site analysis: opportunities and constraints

Building heights

- The area is characterised by two /three storey dwellings above a store. The Civic Centre, the existing Morden Station, and the office building on the proposed site emerge from this low-rise context.



2-3 storey 4-5 storey 6 or more storey

Road frontages

- London Road is the main shopping route in Morden and is characterised by a variety of ground floor retail units.



Retail Office / public Residential Station

Transport links

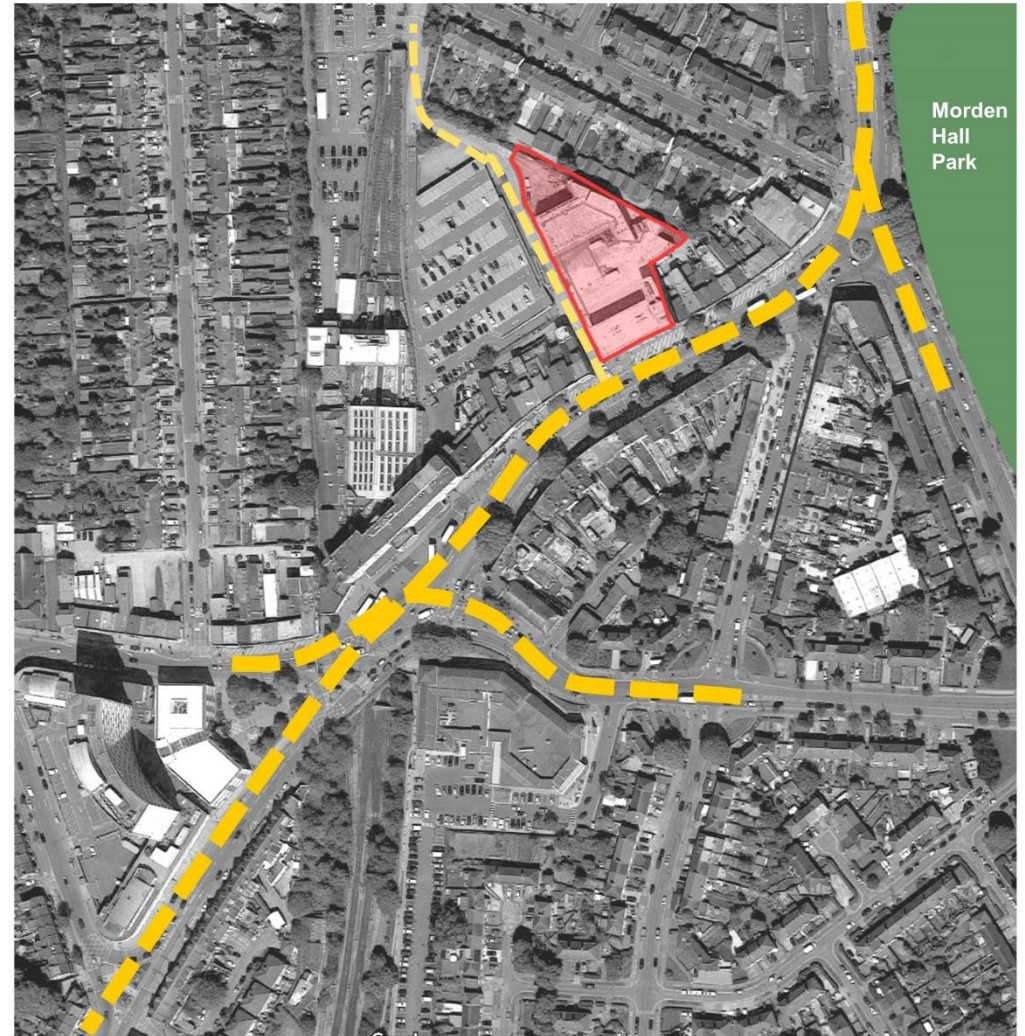
- The site benefits from its proximity to Morden Station, which is the Northern Line terminal. A number of buses serve the area, connecting Morden to central London.



■ Main road ■ Secondary road ■ Train tracks / underground

Noise pollution around the site

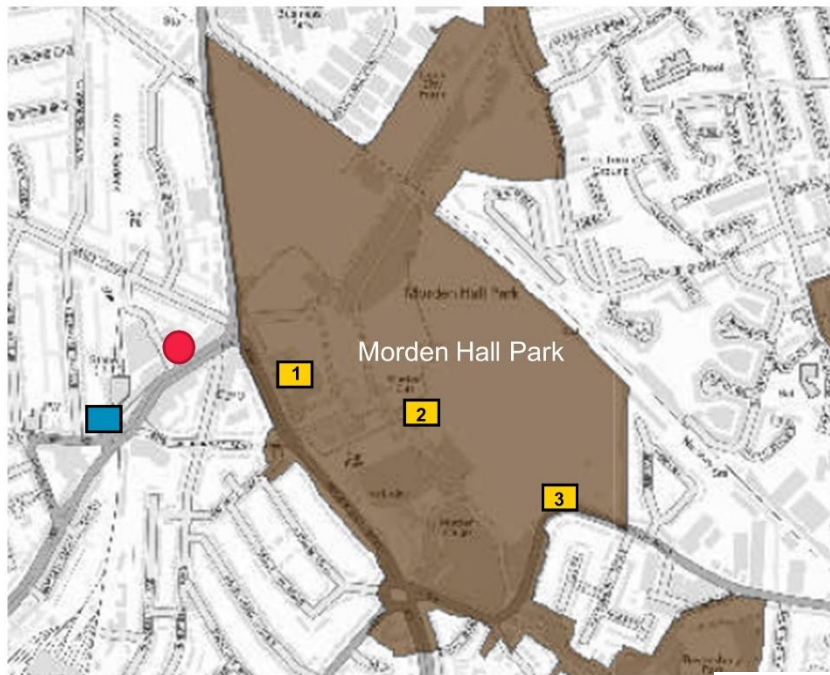
- London Road is a busy road due to the high traffic and the number of buses travelling to and from Morden Station.



Morden
Hall
Park

Conservation Areas & Listed Buildings

- The site is situated 150m approx. from Morden Hall Park.
- There are a number of listed buildings and structures within Morden Hall Park or along its boundaries, such as:
 - 1) Morden Hall
 - 2) Morden Cottage
 - 3) White Cottage
- A building of particular architectural interest is Morden Station, built in 1926.



● Site

■ Conservation area ■ Listed building ■ Building of architectural interest

Flood Zones

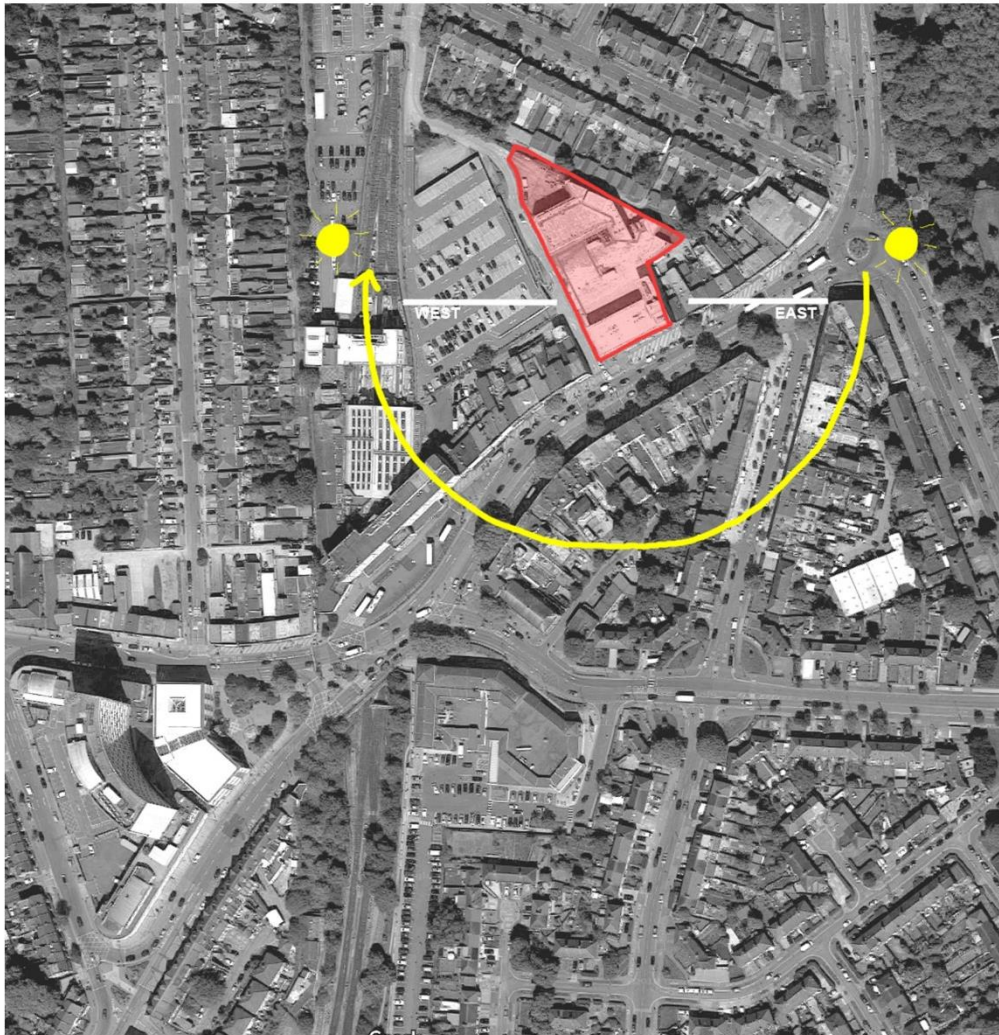
- The proposed site is not within flood zones type 2 (Medium risk) or 3 (high risk) as indicated in the map below.



● Site

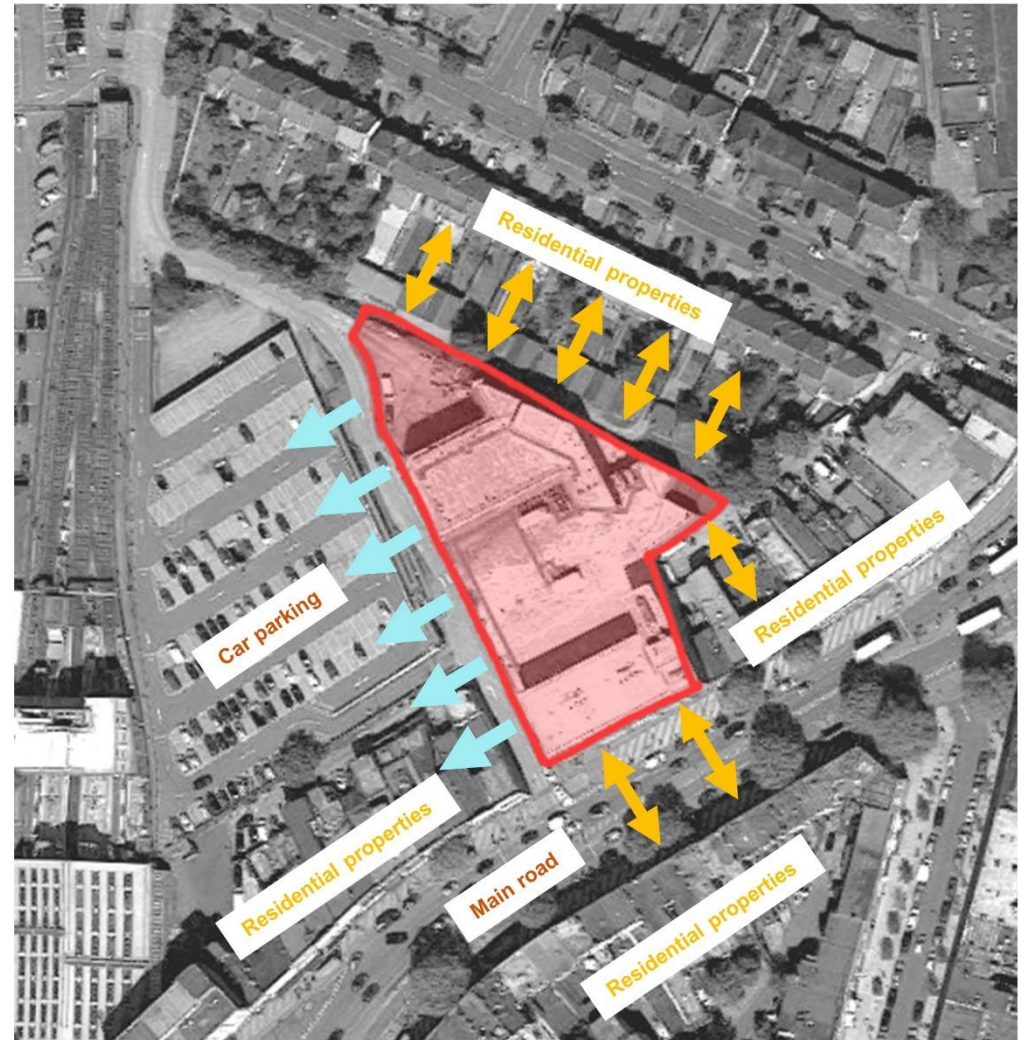
□ Flood Zone 1 Low Probability
 ■ Flood Zone 2 Medium Probability
 ■ Flood Zone 3a High Probability
 ■ Flood Zone 3b Functional Floodplain

Sun path



Aspects

- The proposed site faces low-rise residential properties to the east, whilst to the west overlooks a two storey car park.



Site analysis

Key views

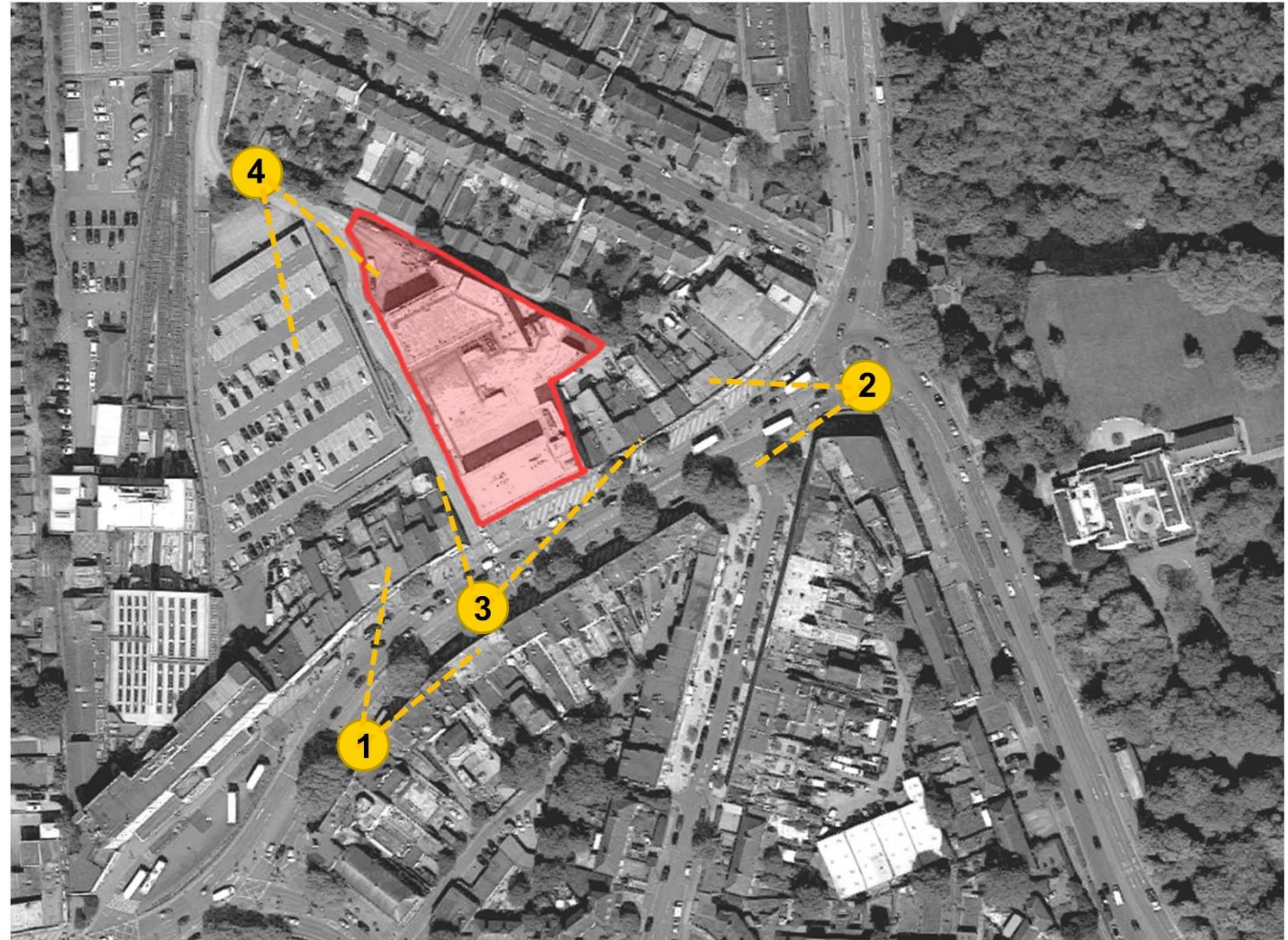
- There are 2 long key views, from east and west, from which any site proposal must be modelled.
- Two additional view of the development looking north and south along Kenley Road should also be considered.



Long view (1) from west



Long view (2) from east



Key view diagram

3.3 Masterplanning principles and proposal site

Merton's approved Masterplan

- Morden is predominantly residential in character, generally made up of small buildings and shops.
- The Borough of Merton's vision for the area is to regenerate Morden through an extensive and efficient redevelopment incorporating higher density housing and commercial opportunities, high quality urban design and public realm proposals providing a safer environment and giving more opportunities for the local residents to socialise.
- The redevelopment of the wider site around Morden Station has been described by Merton Council as a major opportunity to "improve the town centre environment, street scene and pedestrian facilities outside Morden Station, and the parade of shops fronting onto London Road".

The proposed site

- The diagram opposite, (from Morden Station Planning Brief - March 2014), shows that the site at 33-34 London Road, currently occupied by the Sainsbury's Store and Peel House office, is proposed to retain its commercial function use at ground floor with a residential development above. The Masterplan identifies the corner of the site suitable for a high-density landmark residential building.
- The remainder of the proposed site, currently largely occupied by Sainsbury's support facilities, is proposed as suitable for residential redevelopment.
- A new street along the site will reconnect London Road with Kenley Road. New pedestrian and bicycle routes will rejoin London Road with Kendor Gardens.

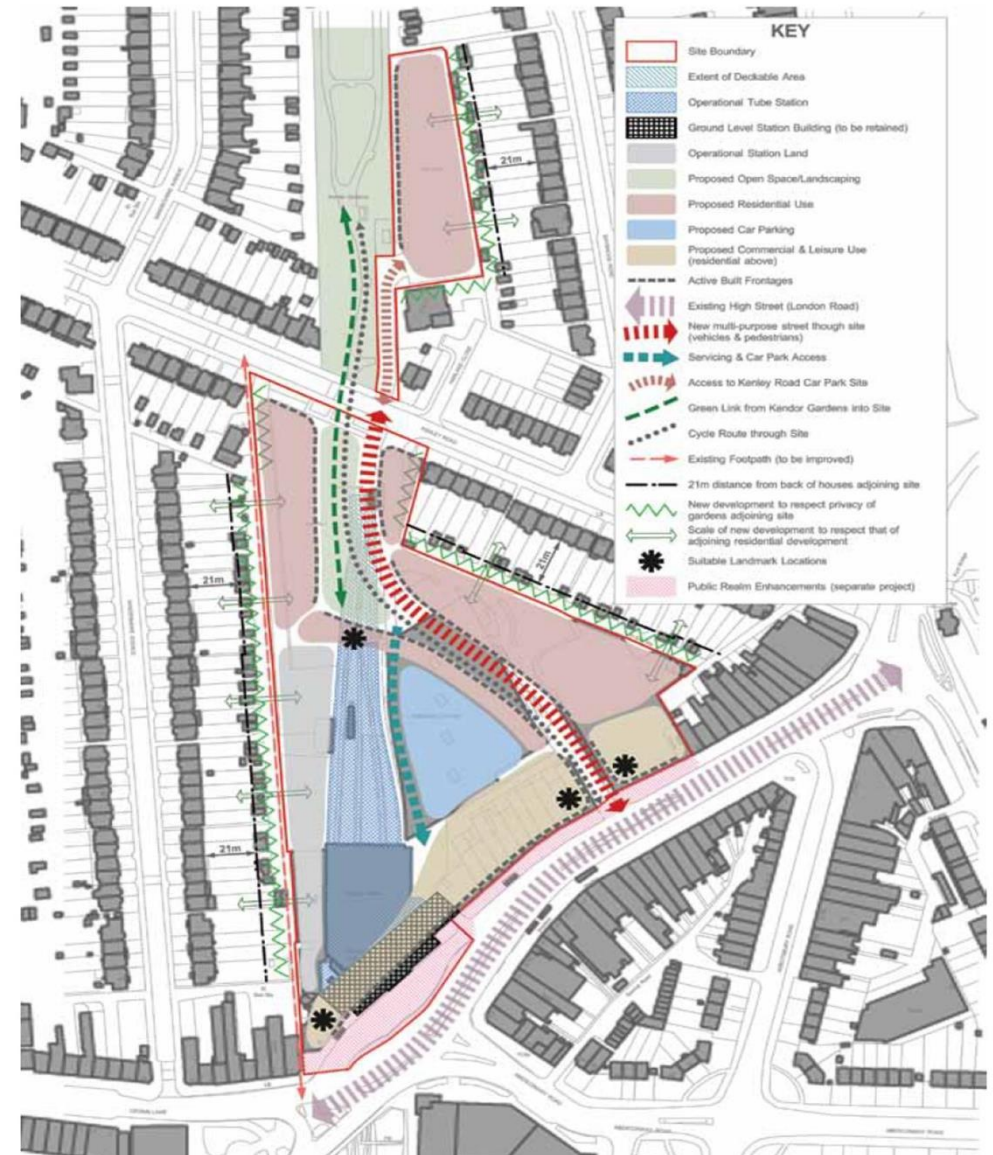


Diagram – Image source from Morden Station Planning Brief - March 2014

Illustrative Masterplan and the proposed site

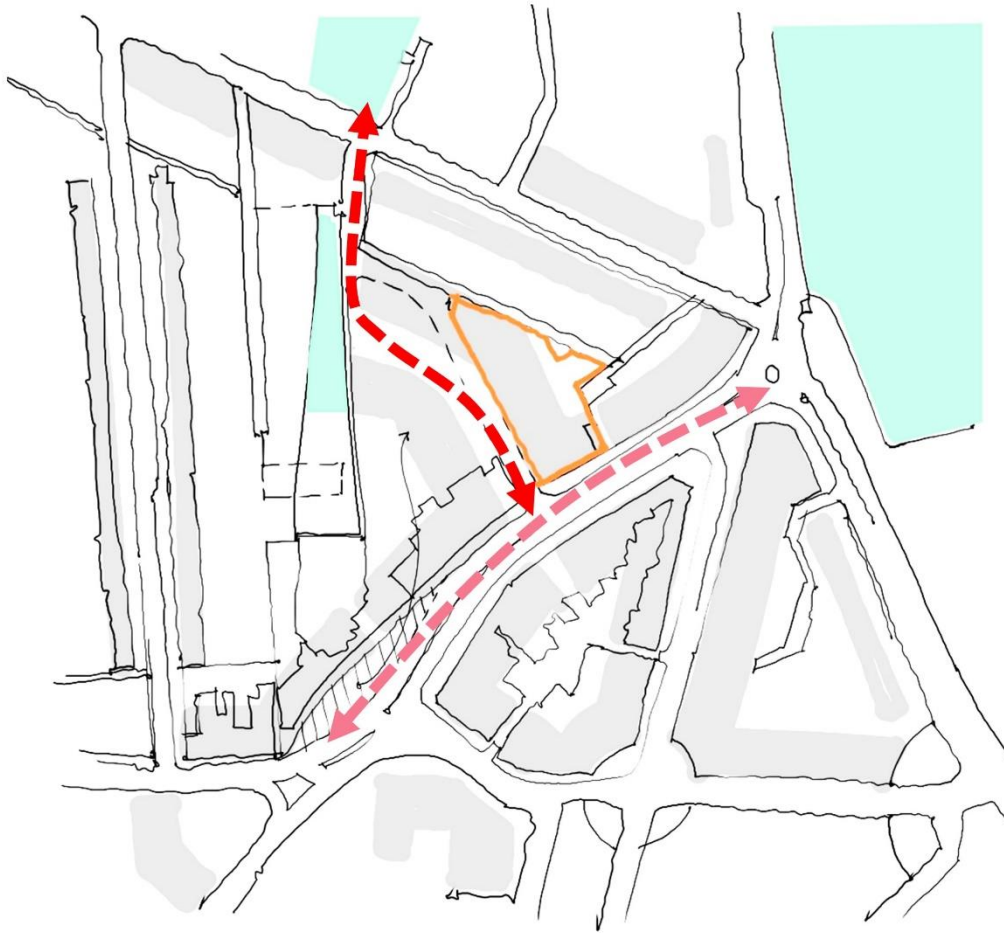


Diagram 1 - A new street along the site will reconnect London Road with Kenley Road. New pedestrian and bicycle routes will rejoin London Road with Kendor Gardens.

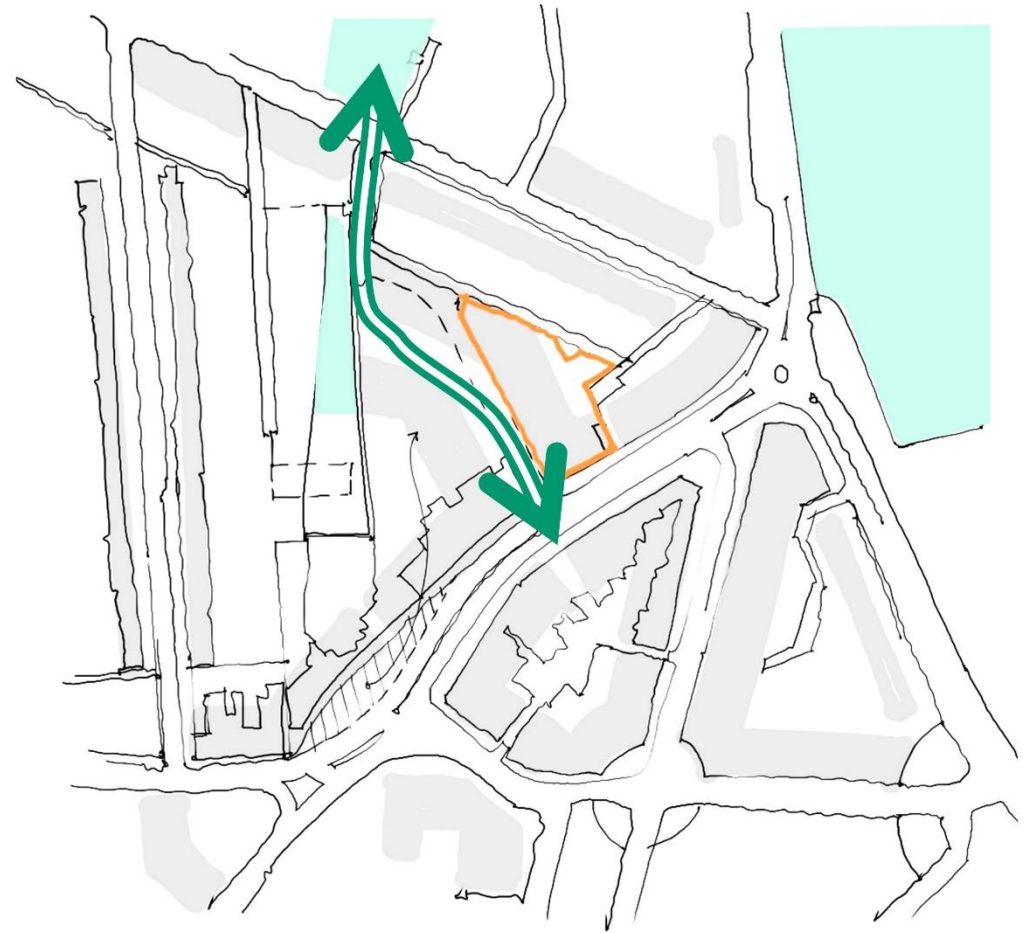


Diagram 2 - The creation of a new green route will encourage pedestrian and cycle movements from the Kendor Gardens area to London Road, to access the shopping parade, reach the station and Morden Hall Park.

Illustrative Masterplan and the proposed site

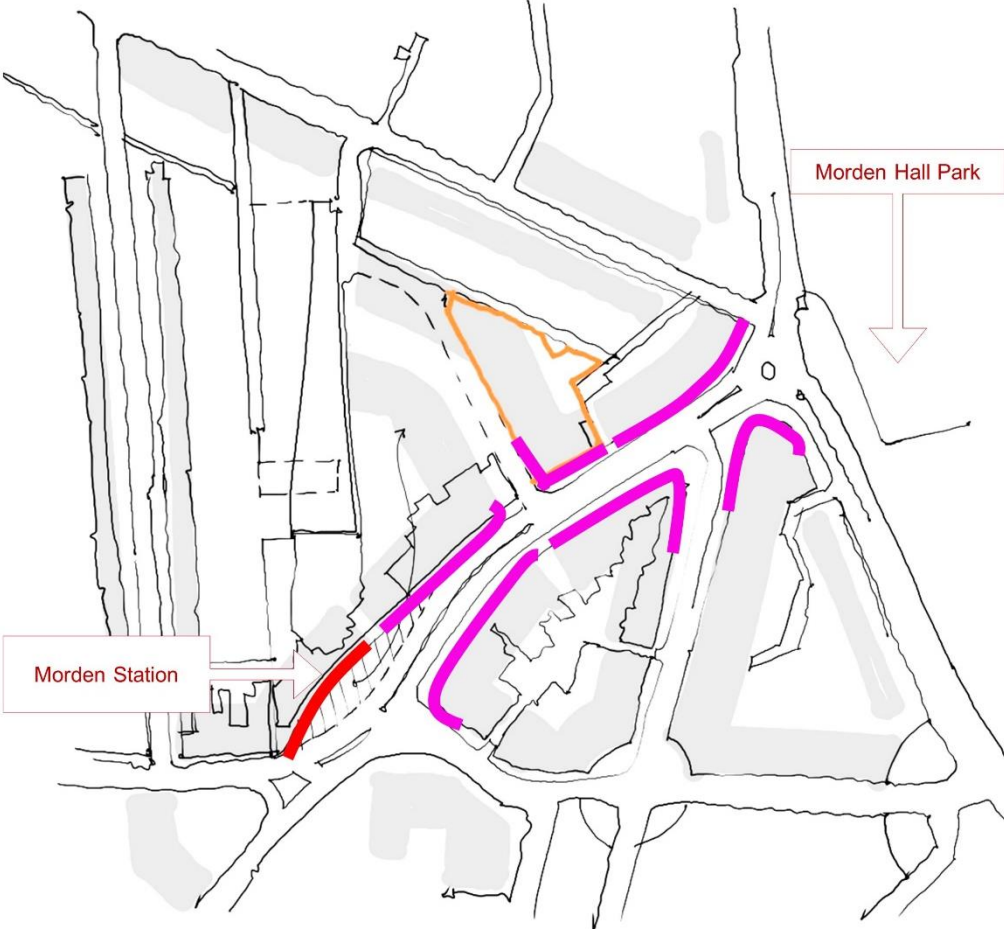


Diagram 3 - The new swathe of residential accommodation above commercial uses on both sides of London Road will define the main shopping route from the Morden Station to the Morden Hall Park.

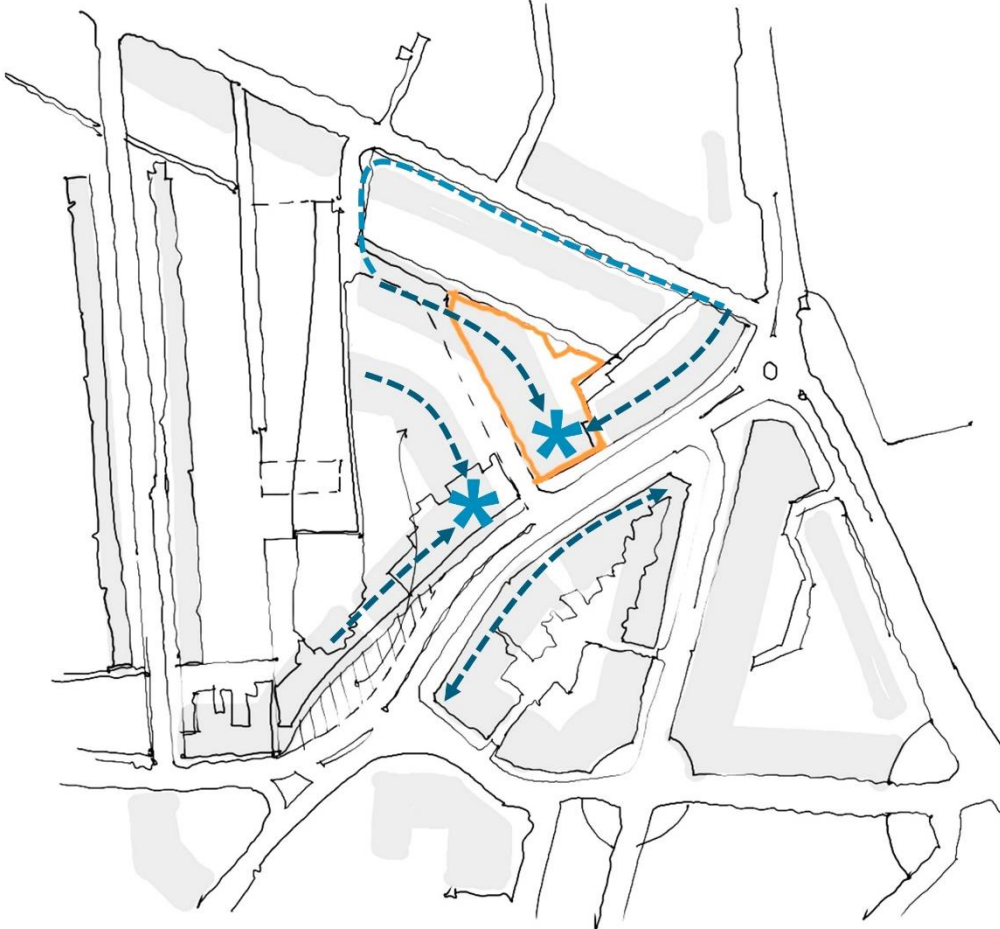


Diagram 4 - The scale of the buildings increases as one moves toward the site and the corner between reconnecting London Road and Kenley Road.

Illustrative Masterplan and the proposed site

Diagrammatic Masterplan

- The purpose of this study has been to examine the opportunities for the redevelopment of the 33-34 London Road site within the parameters of the Borough of Merton's regeneration vision and the approved Masterplan for the Morden area.
- The opposite illustrative masterplan has been informed primarily through creating a new swathe of residential accommodation above commercial uses on both sides of London Road, defining the main shopping route from Morden Station to Morden Hall Park.
- The new green link between Kendor Garden and London Road will encourage pedestrian and cycle movements from the north of the site to the new shopping route, and to Morden Station and Morden Hall Park.

- Existing low-rise buildings
- - - Building varying height
- * Tall building
- Ground floor active frontage with residential above
- ↔ New road, pedestrian and bike link

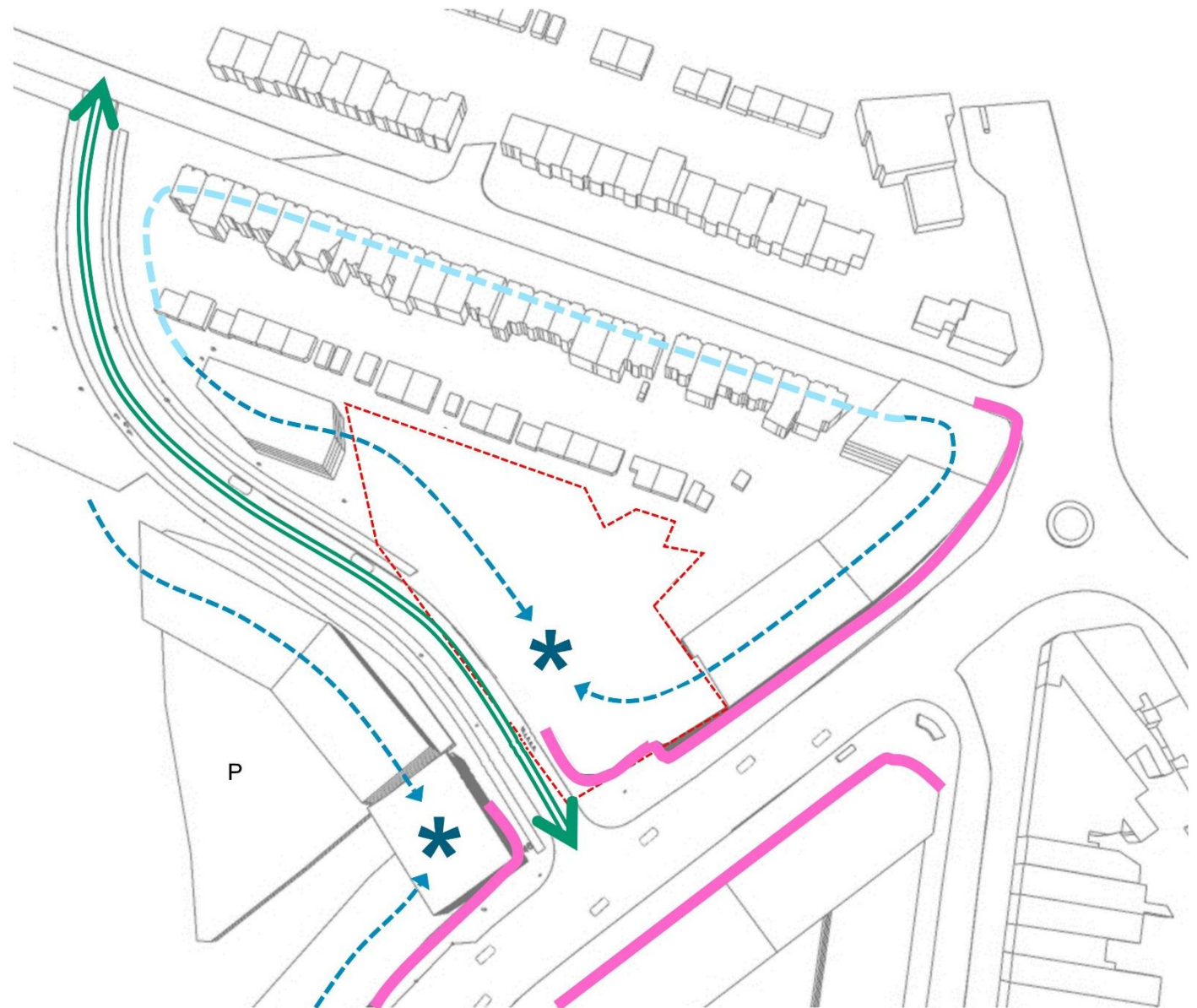


Diagram – Illustrative Masterplan

3.4 Massing and design principles

Design principles

- The proposed building must respond to a number of design principles and react to the immediate context and the approved wider regeneration masterplan for Morden so that the building contributes positively to its context.
- These design principles set for the proposed building including:
 - the scale of the proposed massing and integration with the existing context and the low-rise buildings;
 - the aspiration for a better link to the north of the proposed site and the creation of a 'gateway' on London Road;
 - with the relationship between the public space and the active frontage to be provided;
 - with the provision of residential homes.
- The proposed site benefits from highly sustainable transport links, the proximity of Morden Station and Morden Hall Park.
- There are several masterplanning opportunities for the site:
 - Activating the Kenley Road creating a green corridor;
 - Creating a wider and better quality pedestrian and cycling connection with Kendor Gardens;
 - Improving the town centre retail and leisure proposals;
 - Improving the active frontage at the corner of the site;
 - Creating a focal landmark building;
 - Increasing density of housing in the heart of Morden and its shopping route.

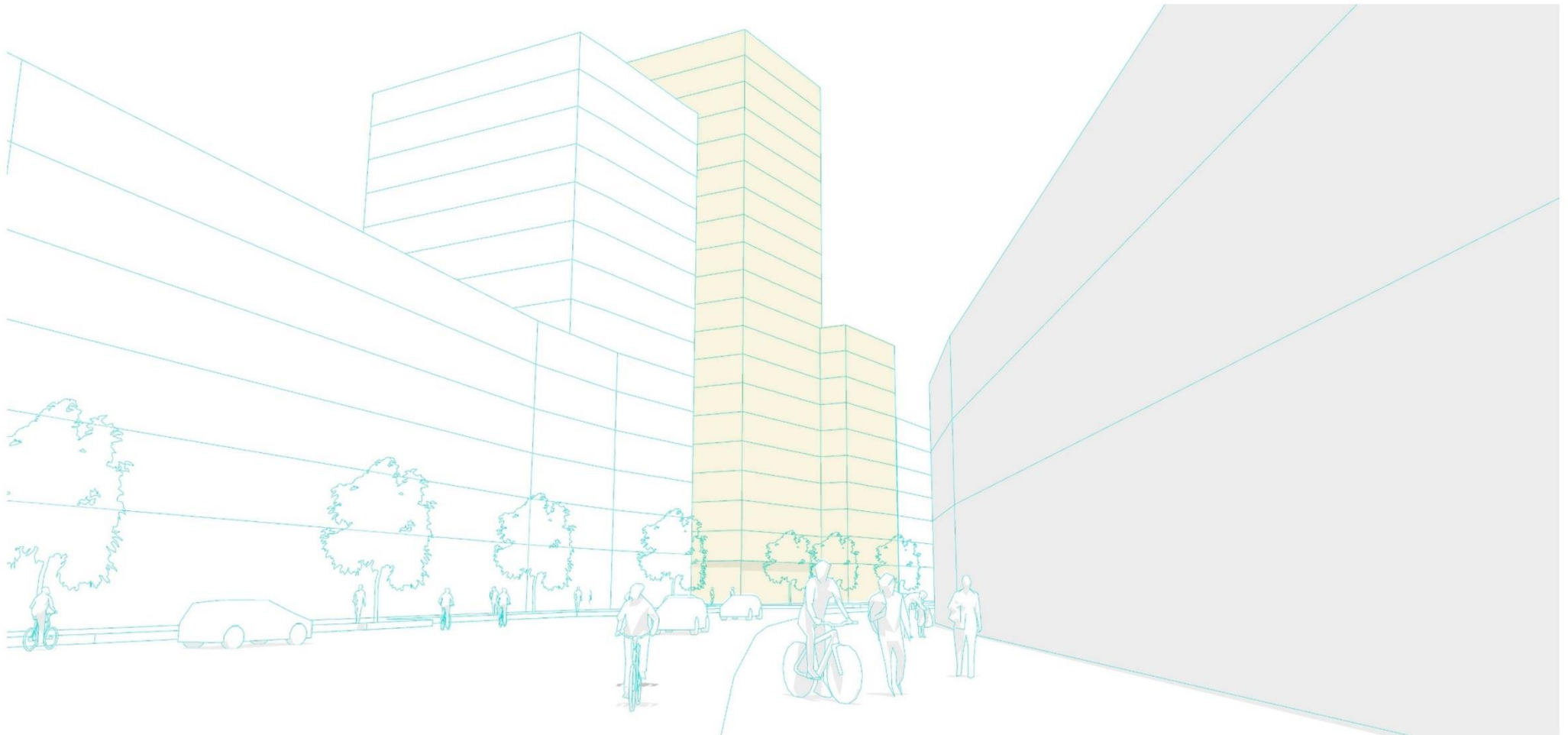
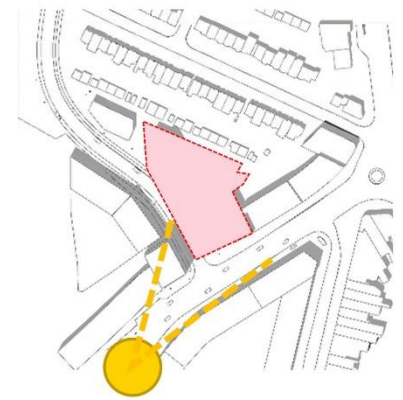
Key principles

- 1 - Increasing the scale
- 2 - Improving the pavement width
- 3 - Provide a new junction
- 4 - Active frontage
- 5 - The building Articulation

3.5 Proposed massing response within wider masterplan

Illustrative massing option

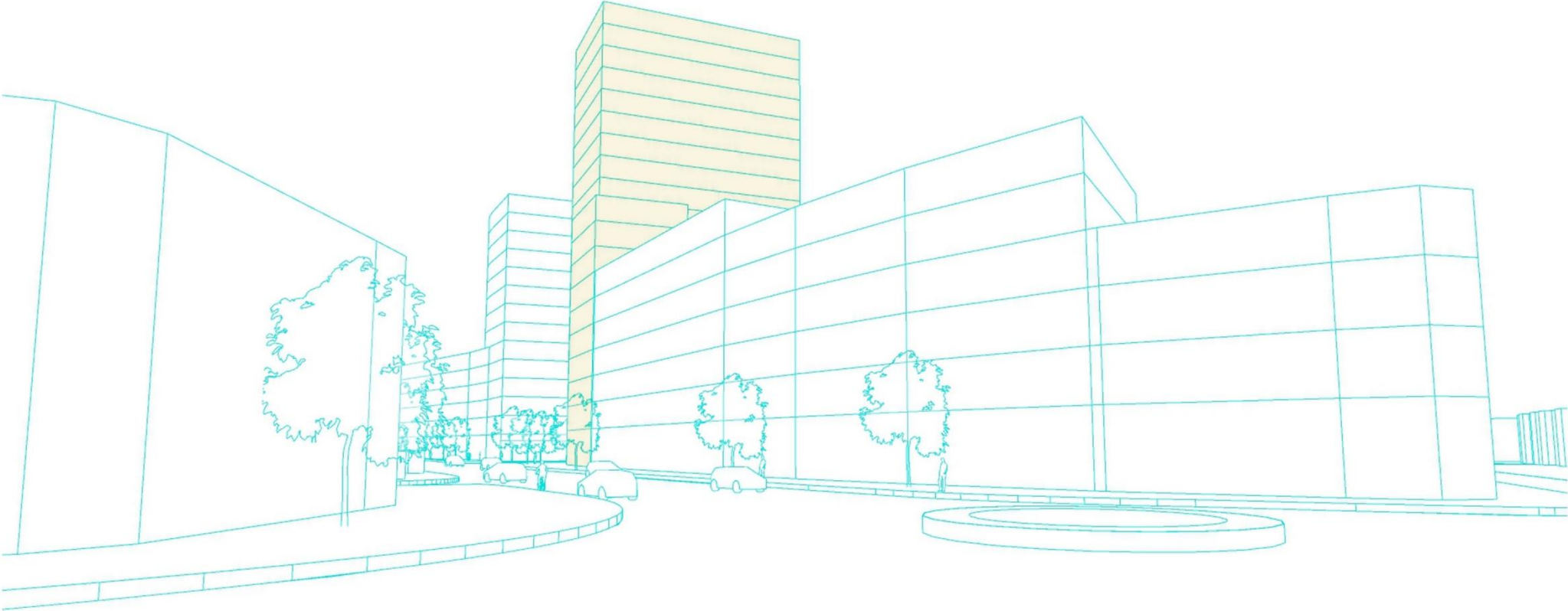
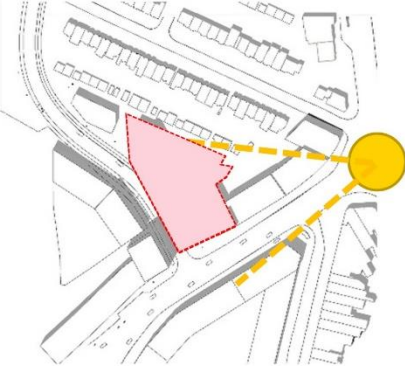
View I



View 1 from west on London Road

Illustrative massing option

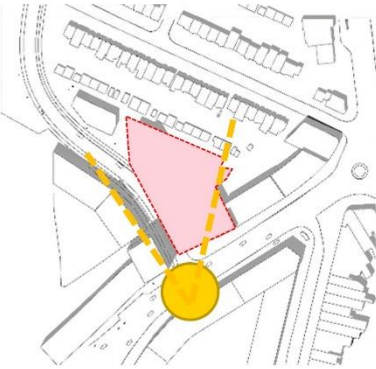
View 2



View 2 from Morden Hall Road

Illustrative massing option

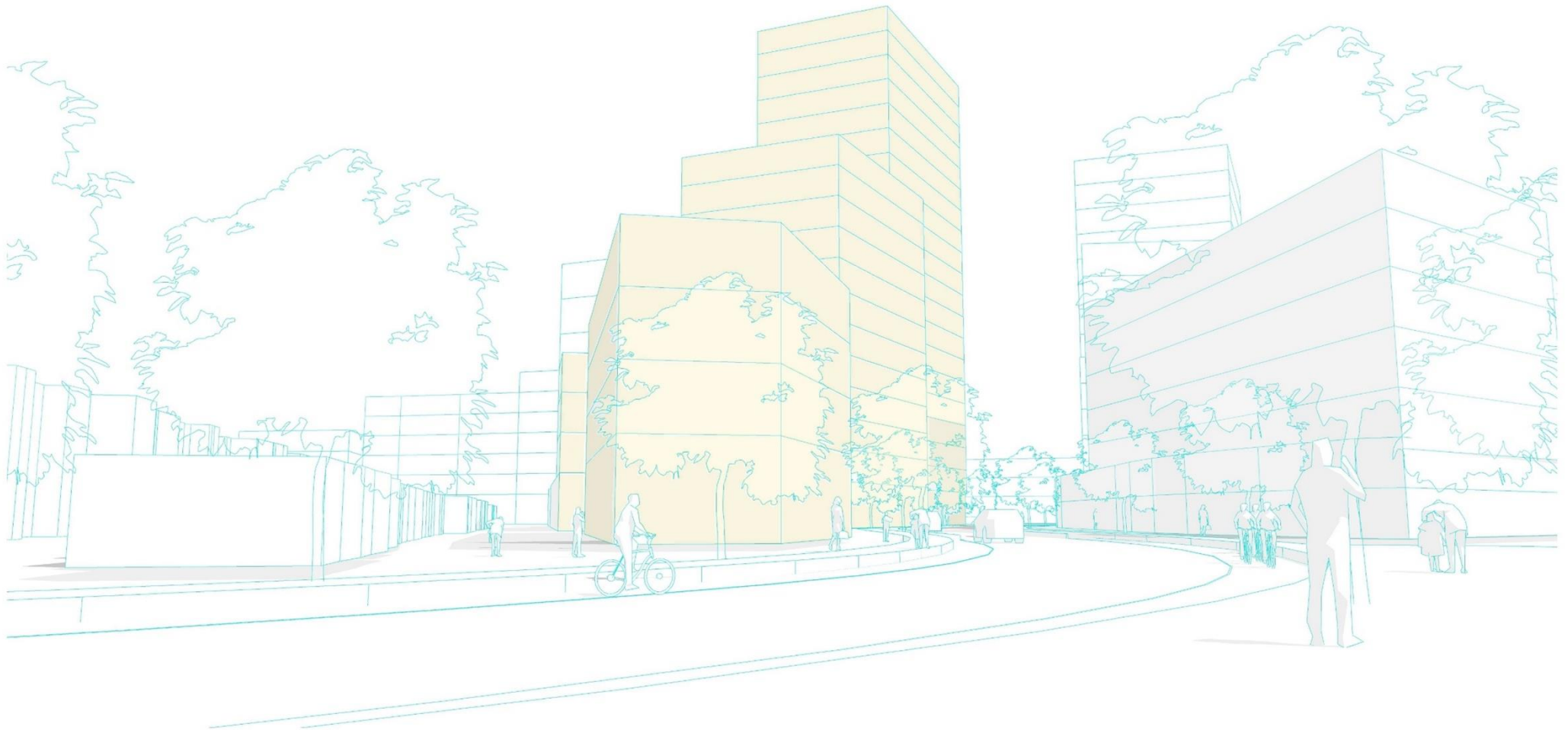
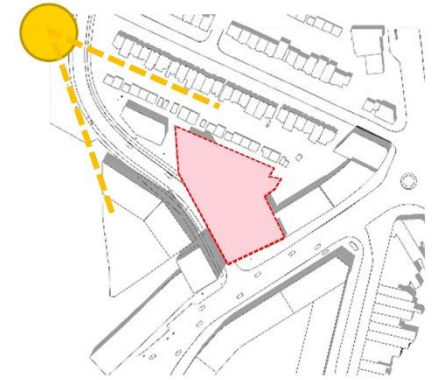
View 3



View 3 from London Road towards north

Illustrative massing option

View 4



View 4 from north on Kenley Road

3.6 Illustrative options for built form appearance

Materiality and ground floor



Amenity spaces



3.7 Masterplan considerations

Masterplan objectives

The masterplanning objectives for the site are summarised as follows:

- A development allowing the potential intensification to be unlocked in the long term within the Borough of Merton's vision for the regeneration of the Morden area.
- A development that fits within Merton's approved Masterplan.
- A development that will incorporate a mix of town centre Class E uses at ground and upper floors levels the amount and mix of use to be determined in accordance with identified need of both existing and prospective new Class E users.
- Provision up to 200 residential units of which 65% will be Private and 35% of Affordable tenures (30% of Affordable Rented, 40% Low-Cost Rent Homes, 30% Affordable Intermediate).
- All residential units to comply with the 2021 London Plan, Building Regulations and any relevant standards.
- Provision of 10% wheelchair accessible apartments across all tenures.
- Three separate cores for:
 - Private,
 - Affordable Intermediate and
 - Affordable Rented/Low-Cost Rent.
- Provision of private amenity space (balconies and private terraces).
- Provision of 10% wheelchair accessible parking spaces for the residents.
- Provision of bike spaces (mix of Sheffield and double stacked type stands).
- Dedicated refuse storages (assuming the collections twice a week).
- A deliverable development that would comply with the 2021 London Plan, Building Regulation and any Standards.

All possible site redevelopment options, set within the guiding masterplanning principles to deliver the allocated uses as given in Appendix 2 will need to have details of the proposed development option negotiated at subsequent pre-application meetings with the London Brough of Merton.

4.0 Planning Policy Assessment - Conformity with the adopted London Plan

Section 4 - Planning Policy Assessment - Conformity with the adopted London Plan

- 4.1 We note that the adopted March London Plan 2021 is the Spatial Development Strategy for Greater London. This sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 4.2 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.
- 4.3 It is noted that to the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70 (2) of the Town and Country Planning Act 1990 and section 38 96) of the Planning and Compulsory Act.
- 4.4 With reference to the proposed development, the extant adopted development plan comprises of the following:
- The London Plan – Adopted March 2021
 - London Borough of Merton Core Strategy – Adopted July 2011
 - Sites and Policies Plan and Policies Map – Adopted July 2014
- 4.5 It is however noted that the most up to date development plan is the London Plan adopted in March 2021. Therefore, it is necessary to assess whether the proposed site allocation sought in Appendix 2 is supported by the policies of the recently adopted London Plan.

London Plan Assessment

- 4.6 It is considered that that for reasons given below, the proposed allocation of the site for the mix of land uses as given in Appendix 2 - derived from masterplanning principles given in section 3 of this representation - is supported by the planning policies of the adopted London Plan under the following generic planning policy considerations
1. Regeneration of Morden Town Centre/Town Centres.
 2. Proposed Mix of Uses
 3. Design
 4. Sustainability

Regeneration of Morden Town Centre/Town Centres

4.7 We note the adopted development planning policies either specifically refer to Morden Town Centre or to London wide spatial strategies relating town centre regeneration.

London Plan

- Policy GG2 – Making the best use of land – A,B and C.
- Opportunity Areas SD1
- Annex 1 – where Morden is identified as a District Town Centre.
- Policy SD6 – Town Centre and High Streets
- Policy SD7 - Town centres: development principles and Development Plan Documents
- Policy SD10 - Strategic and local regeneration

Policy Assessment – Regeneration of Morden Town Centre/Town Centres

4.8 It is considered that the proposed allocation of the site for the development as proposed in Appendix 2 is supported by the London Plan town centre/brownfield sites. This is because the proposed development is located within Morden Town Centre - which is identified in the London Plan – as District Town Centre – within the Wimbledon/Colliers Wood/South Wimbledon Opportunity Area. The development will regenerate a strategic town centre brownfield site for higher density, residential led development, with ground and upper floor town centre uses, on a site which is highly accessible by public transport.

Proposed mix of uses

4.9 The following London Plan housing and town centre uses related adopted planning policies are identified below:

- Policy H1 – Increasing Housing supply
- Policy H4 – Delivering affordable housing
- Policy H5 – Threshold approach to applications
- Policy H6 – Affordable housing tenure
- Policy H10 – Housing size mix
- Annex 1 – Town Centres
- Policy SD6 – Town Centres and High Streets
- Policy SD7- Town Centres – development principles and development plan documents

- Policy SD10 – Strategic and local regeneration

Policy Assessment – Mix of Uses

- 4.10 It is considered that the proposed site allocation as given in Appendix 2 is supported by adopted London Plan housing policies H1,4,5,6 and 10. This is because the proposed development will deliver much needed new housing – 189 units, including 35% on site for affordable housing – across all affordable housing tenures as shown by the housing mix schedule – which will help the London Borough of Merton to meet its identified housing needs within the next 5 to 15 years.
- 4.11 Specifically, we note that Merton’s housing target is set out in Table 4.1 of the PLP is for the delivery of 9,180 new homes for the period 2019 to 2029, or 918 new homes a year. The Mayor’s threshold approach also sets the threshold level for affordable housing at 35% on privately owned land.
- 4.12 We also note that the London Borough of Merton’s 5 year housing supply of June 2020 has a very heavy reliance on the development of small scale permitted housing sites under 10 units; identified site allocations only account for 11% of housing delivery supply targets from 2020 to 2025.
- 4.13 It is noted that this assessment identifies “Morden town centre regeneration phase 1” as a 5 year net gain of only 80 units between 2020 to 2025. However, we question whether “phase 1” site(s) are actually available, viable and deliverable within the next 5 years.
- 4.14 This uncertainty contrasts with the proposed development site allocation which is in single site ownership and is both viable and deliverable within the early part of the 15 year plan period. The development site can also be integrated with adjacent sites for already allocated for development within Morden Town Centre – including proposal site 58 of the site allocations plan - within the car park which serves both shoppers and visitors to Morden Town Centre.
- 4.15 The proposal will therefore deliver much needed new housing – including affordable housing -across a range of affordable housing tenures as specified by the London Plan - within Morden Town Centre.
- 4.16 In relation to other proposed town centre uses, the development will provide replacement Class E space - retail space at ground floor level and also replacement office space on levels 1 and 2.
- 4.17 These town centres uses will be integrated within the residential led development and will serve both new and existing residents as well visiting members of the public.
- 4.18 It is therefore considered that by including these town centre uses within the development, the proposed mix of uses is supported by the town centre related policies of the London Plan – namely Annex 1, SD 6,7 and 10.

Design Considerations

4.19 We note the following adopted development planning policies which specifically refer to Design considerations when determining planning applications – either generically or within Morden Town Centre.

London Plan

- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 – Delivering good design
- Policy D5 – Inclusive design
- Policy D6 – Housing quality and standards
- Policy D7 – Accessible Housing
- Policy D8 – Public Realm
- Policy D9 – Tall Buildings
- Policy D12 – Fire Safety

Policy Assessment - Design

4.20 Section 3 of this representation gives a masterplan solution for the proposed regeneration of the site.

4.21 In deriving this masterplan solution, the following design principles have been considered as outlined in this pre-application supporting document:

- The site's surrounding land use context – types of uses; their scale/layout/appearance.
- Potential constraints – heritage; flooding.
- Potential opportunities – highly sustainable and accessible site; site's aspect;
- Adopted Planning Policy context – need for the delivery of high quality well designed residential development which maximise the use of a highly sustainable brown field site.
- Need to replace and incorporate other town centre uses.
- Flexibility and support to the wider regeneration Morden Town Centre objectives as given the Morden Station development brief/site allocations development plan document.

4.22 The masterplan therefore incorporates following design related planning policy considerations in the proposed site layout, scale and mix uses:

- To respond to the proposed masterplan as given in Figure 15 of the Morden Station Planning Brief by:
 - Ensuring the proposed new north south link road and pedestrian access between London Road and Kenley Road is incorporated into the development.
 - Providing the opportunity to develop a landmark and high quality 20 storey building on a prominent gateway location at London Road/link road junction.
 - Reducing the scale of the development northwards to reflect the scale of neighbouring uses.
 - Providing the ability to incorporate subsequent phases of the regeneration of sites within Morden Town Centre to the west of the link road and to the north east at the existing Sainsburys car park site.
- Providing a high density residential development in order to assist in the London Borough of Merton delivering its increased housing needs as set out in the London Plan.
- Providing the mix of houses tenures – private for sale and affordable mix – housing types – studio, 1-4 bedroom units in order to comply with adopted development plan housing policies and building standards.
- Providing both private and communal residential amenity space at roof level.
- Providing active ground floor frontages for town centre uses.
- Making the development car free, other than for the provision of disabled spaces and provision of cycle spaces in accordance with adopted development planning transportation policy.

4.23 It is therefore concluded that the proposed design solution as given in the submitted masterplan is supported by the adopted London Plan design related policies as identified.

London Plan Sustainable Development Planning Policy Considerations

4.24 We note the Sustainability Statement – London Plan (Spatial Development Strategy for Greater London), March 2021

4.25 The statement says that the replacement London Plan seeks to support the sustainable development of London. The Plan policies have been assessed by the IIA process to be a sustainable response to the pressures and challenges facing London, particularly to achieve Good Growth. The Inspectors' Panel concluded that:

“Overall we therefore conclude that the IIA meets legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment.”

4.26 We note the following sustainable assessments of the London Plan’s strategic options relating to

Making the best use of land

Option 2, Sustainable intensification, was chosen as the preferred option. It seeks to ensure that economic growth is focussed around the CAZ, Isle of Dogs, Old Oak Common and Stratford, alongside town centres and inner and outer London. It aims to ensure that housing is delivered in residential-led Opportunity Areas, town centres, and other sites throughout London. Housing-led mixed use redevelopments would support a design-led approach to maximise densities in town centres, especially areas with high connectivity to public and active transport. This option would maximise available development through the intensification of existing sites as well as the identification of additional development potential.

Delivering the homes Londoners’ need

The London Plans housing policies aims to increase the number of houses on the market, including high quality and affordable new homes. The option would facilitate inclusive developments, supporting the needs of the wider community and those with specific requirements. Social objectives would be met through the development of inclusive communities and wide range of choice available.

Affordable homes will ensure a diverse workforce is able to live in London and not be priced out. Health objectives would be met through reduced isolation and by meeting the needs of those with health conditions. The option would support efficient land use, infrastructure, connectivity, and housing objectives by using brownfield sites appropriately, delivering supporting infrastructure, and ensuring communities are connected by strong active and public transport networks. This option delivers economic benefits through provision of access to employment and education by ensuring affordable housing is available to the workforce, and supporting regeneration of deprived areas to create opportunities across London.

4.27 In relation to town centres the sustainable assessment notes that

“Modifications to various policies (July 2018 Addendum) improved scoring for making best use of land, protecting and enhancing town centres, improving outcomes for housing delivery, safeguarding and enhancing the City’s rich offer and creating attractive, mixed use neighbourhoods. The ItP Plan modifications (December 2019 Addendum) scored higher for creating attractive and mixed neighbourhoods and further improved scoring for supporting a resilient and diverse economy.”

Policy Assessment – Sustainable Development

4.28 The planning system’s purpose it to achieve sustainable development through the delivery of three cornerstones of planning; economic, social and environmental opportunities.

4.29 The proposed development is supported by the adopted development plan policies which have been tested for meeting sustainable development requirements as set out in the National Planning Policy Framework (NPPF) through the approval of their respective development plan sustainable assessments.

4.30 The principle of the proposed development is therefore supported by the policies of the adopted London plan because:

- The site is located within Morden Town Centre.
- The development maximises the use of a highly accessible brown field site.
- The proposed mix of uses will deliver needed new homes and provide other town centre uses.
- The development will deliver a well-designed landmark development which can be integrated in with adjacent sites to regenerate Morden Town Centre.

4.31 In terms of compliance with meeting sustainable development environmental impact requirements set out in the adopted development plans relating to

- | | |
|------------------------------------|--|
| • Air Quality | London Plan Policy S1, Site Policies DM2 |
| • Minimising Green House Emissions | London Plan Policy S2; Site Policies DM D2 |
| • Managing Heat Risk | London Plan Policy S3; Site Policies DM2 |
| • Reducing water usage | London Plan policy S4; Site Policies DM D2 |
| • Reducing waste | London Plan Policy S5; Site Policies DM D2 |
| • Sustainable Drainage | London Plan Policy S13; Site Policies: DM F2 |
| • Mitigating Transport Impacts | London Plan Policy T4; Site Policies DM T2 |
| • Climate Change | Core Strategy Policy CS15; Site Policies DM2 |

these requirements can be made subject to planning conditions or section 106 requirements on submission of the necessary technical details in support of detailed design set within the parameters of development relating to the scale and layout and access as given in the proposed masterplan.

5.0 Plan Making Considerations

Section 5 - Plan Making Considerations

5.1 The National Planning Policy Framework states in relation to the Plan Making process that

- Paragraph 16 –plans should be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively in a way that is aspirational but deliverable
- Paragraph 35 - Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.

5.2 Plans are ‘sound’ if they are:

- positively prepared -providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period
- consistent with National Planning Policy.

5.3 It is considered for reasons given below that the Section 5 of the submitted Merton Local Plan – and in particular policies N5.1 and site allocation MO4 - are not sound for the following reasons.

1) Not Positively prepared

- Increased London Plan 5 year housing needs - will not be met by comprehensive regeneration of Morden.

2) Not justified - requirement for comprehensive development within site allocation MO4.

- The policy has not looked at alternative strategies that can deliver Morden town centre regeneration and high density housing – incremental site by site development within the Morden Town Centre regeneration has been specifically excluded – but was accepted in previous development plans and accepted as being acceptable outside site MO4.
- Consideration of dividing Policy area MO4 into priority site phases/land uses –taking the approach that incremental development of key sites within an guiding masterplan concept of adopted masterplan – for example with the existing surface car park for used for a relocated bus station; replacement affordable housing on council owned sites across London Road.
- Policy not supported by an Opportunity Area Planning Framework as required by the London Plan. Not yet prepared or out for consultation – the Hawkins Brown masterplan no status.

3) Evidence that comprehensive approach is deliverable over the 15 year plan period – and not all delivered in the last 5 years of the plan period.

- Viability of the comprehensive approach – no evidence market take up in the post covid world and evidence of funding for such a large scale comprehensive development. The delivery is aspirational and not deliverable without the need to CPO many land ownerships within policy are MO4.
 - Evidence that the Council been collaborative with private owners of sites within the Morden Regeneration area – and led only by public sector land owners seeking to reinvest the uplift to fund their own shortfall of funding for infrastructure.
 - Not supported by an Opportunity Area Planning Framework as required by the London Plan. Not yet prepared or out for consultation – Hawkins Brown masterplan no status.
- 4) The comprehensive approach is aspirational and so not consistent with National Policy

6.0 Conclusions

Section 6 - Conclusion

- 6.1 It is concluded that the proposed site allocation for uses as given in Appendix 2 represents sustainable development as defined by paragraph 11 of the National Planning Policy Framework.
- 6.2 This is because our representation demonstrates that the proposed mix of uses and scale is supported by recently adopted London Plan policies relating to:
- Regeneration of town centres and Morden Town Centre – see page 35
 - Proposed mix of uses and layout standards – see pages 35 -36
 - Design – see pages 37-38
 - Allocating the site delivers sustainable development – see pages 38-40
- 6.3 Chapter 5 of the Merton Development Plan is not sound for reasons given in section 5 and to make sound the plan needs to
- Allocate the site for the mix of land uses as given in Appendix 2 within Policy M04.
 - Amend Chapter 5 Morden policy and specifically policy M04 to delete all requirement for comprehensive regeneration only as per Appendix 3.
 - Include site in Appendix 2 to a new allocation within Policy M04 as per Appendix 3

Appendix I

Appendix 1 – Site Plan



Bird's eye view of Morden from south - Image sourced from Bing Maps

Site location

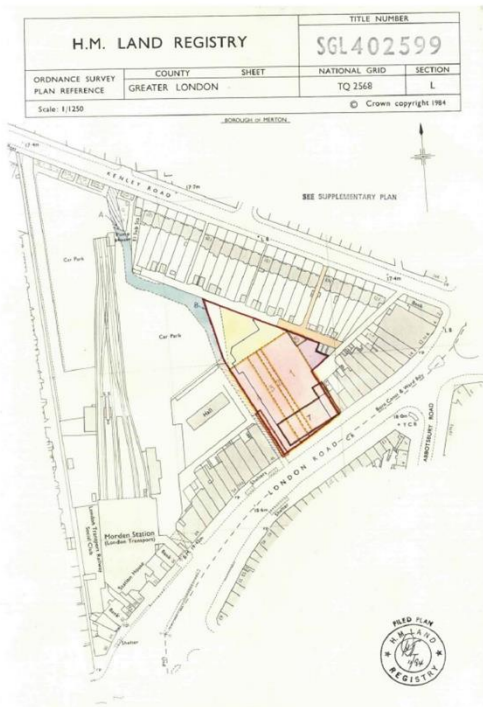
- The site is located on London Road (A24) in the Merton Park Ward, to the East of Morden Station and benefits from the proximity to Morden Hall Park in the east.
- The Civic Centre and Morden Station are located further west.
- The site is bounded on the north east by residential properties, to the east by a two-storey car park and Abercomway Road, and to the south by London Road (A24).
- The ground floor of the proposed site is currently occupied by Sainsbury's with its facilities; the three upper floors are occupied by Peel House Office.
- Given the excellent transport links provided by a high number of buses and the underground (Northern Line), the site benefits from a public transport accessibility level PTAL rating of 6b.

- 1) 2-storey car parking
- 2) Morden station
- 3) Morden Hall Park
- 4) Morden Civic Centre

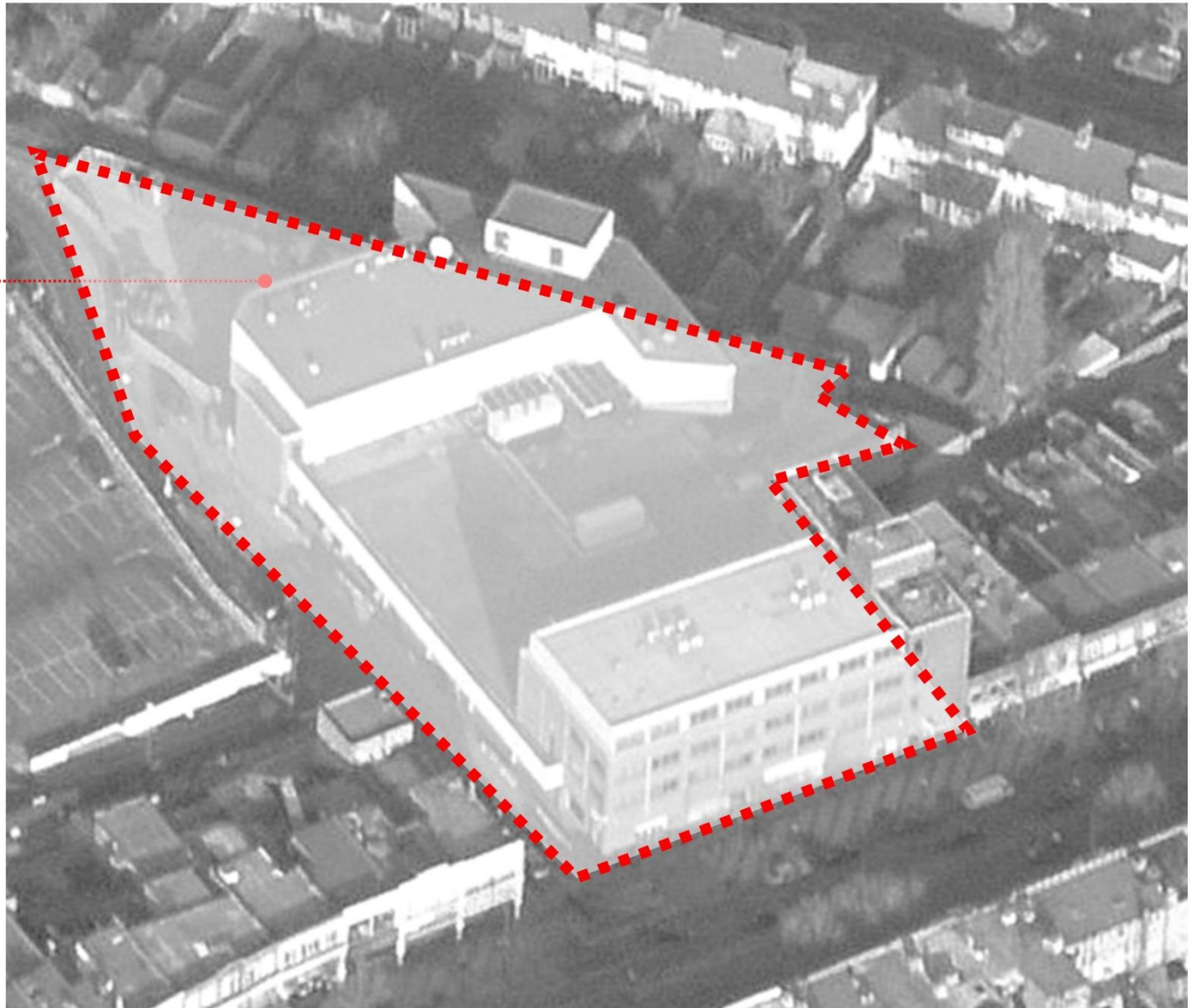


Image sourced from Google Maps

Site area: 3700 sq.m approx



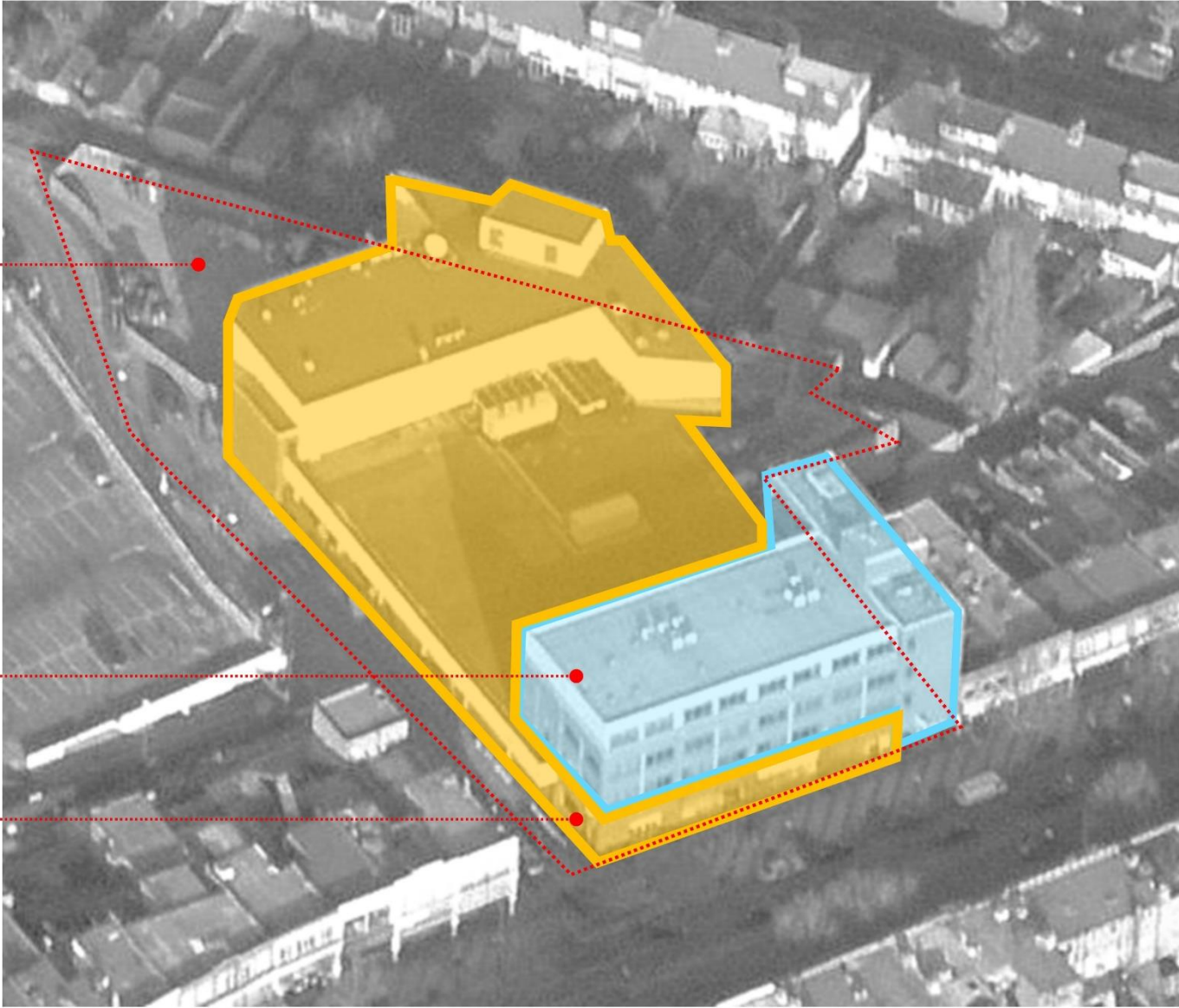
Title Plan



Sainsbury's deliveries / back of house

Peel House office accommodation

Sainsbury's store



Appendix 2

Appendix 2 – Proposed Mix of Land Uses

Allocation of the site for a high density residential led, mixed use development within Morden Town Centre which can deliver:

- a. Up to 200 residential units
- b. A landmark building of up to 20 storeys high.
- c. Residential component to comprise of no more than 65% for sale and at least 35% of affordable housing tenures, including 30% affordable rented, 40% low cost rent houses and 30% affordable intermediate.
- d. Provision for Class E uses.
- e. Provision of new private and public amenity space for residents
- f. Car free development, except for disabled access for residents and Class E uses as per adopted London Plan standards.

Appendix 3

Appendix 3 – Sought amendments to Policy N5.1

This policy supports the rejuvenation of Morden to create a modern, attractive and vibrant destination that meets the needs of the current and future residents, businesses and visitors, and provides economic, social and environmental benefits. This will be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes intensification and **incremental site by site** development within the Morden Regeneration Zone.

The development capacity of the Wider Morden Town Centre Area will be significantly increased through a plan-led approach which will:

- ☑ incorporate new homes at higher densities than the surrounding residential streets, with a diverse mix of housing sizes and tenures.
- ☑ improve and diversify space for shops and businesses.
- ☑ provide high quality public realm and attractive and useful public spaces and planting.
- ☑ create healthier streets with better connectivity and permeability for pedestrians and cyclists.
- ☑ reduce traffic dominance, improve walking, cycling and vehicle links into and around the town centre; and
- ☑ provide better services and facilities for the people who live, work or study in, or pass through Morden.

By focusing regeneration in the Wider Morden Town Centre Area, this plan-led approach will help to enhance the character and distinctiveness of the surrounding suburban Morden Neighbourhood. We will achieve this through:

- a. The ~~comprehensive~~ regeneration of the Morden Regeneration Zone (Site Mo4), to optimise the delivery of new homes (including affordable homes), improve the street scene and public realm, make it easier for all to get around, and support businesses and other appropriate uses within the Morden Regeneration Zone. **Incremental site by site proposals that contribute to** ~~assist~~ the longer term delivery of ~~comprehensive~~ regeneration as described in this policy and Site Allocation Mo4, will be supported.
- b. Improving the appearance, user experience and air quality of Morden by relocating the bus stands outside Morden underground station away from their current location to help create healthier streets and a welcoming public space outside the Morden underground station entrance.
- c. Incorporating a range of appropriate public spaces and streets within the Morden Regeneration Zone that enhance accessibility through the Wider Morden Town Centre Area, with pedestrians and cyclists as the priority.
- d. Incorporating green infrastructure that contributes to improved drainage, air quality and the creation of green links through the Morden Regeneration Zone and the Wider Morden Town Centre Area, connecting to the open spaces in the surrounding Morden Neighbourhood.
- e. Supporting tall buildings within the Morden Regeneration Zone and in limited locations within the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. Tall buildings should be located appropriately and relate well to the surrounding context and public realm, particularly at street level. Tall buildings must be informed by comprehensive townscape appraisal and visual assessment.
- f. Supporting an appropriate mix of retail, office, community and leisure uses, including night time uses, within the Morden Regeneration Zone and the Wider Morden Town Centre Area, which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.

g. Investigating the feasibility of decentralised energy and district heating which takes account of opportunities within the Morden Regeneration Zone, the Wider Morden Town Centre Area and potentially the wider Morden Neighbourhood. Suitable futureproofing measures should be implemented where appropriate.

h. Supporting incremental site-by-site development **both within and outside** the Morden Regeneration Zone ~~but within the Wider Morden Town Centre Area~~, where it:

☐ is of a high-quality design,

☐ complements and co-ordinates with the surrounding built form and public realm,

☐ supports the delivery of new homes and complementary town centre uses, and

☐ makes it easier for all to get around and in particular, encourages walking and cycling.

i. Ensuring that development within the Morden neighbourhood, which surrounds the Wider Morden Town Centre Area, conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure.

j. Supporting transport improvements within the Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area, such as improvements to the existing tram network and improvements that help enable active travel.

Sought Amendments to Policy Site Mo4: Morden Regeneration Zone

Ward: Merton Park, Ravensbury and St Helier.

Site description: The site (regeneration zone) includes:

- ☒ Kenley Road carpark.
- ☒ Morden underground station and bus interchange.
- ☒ London Underground Limited (LUL) staff car park and operating facilities to the rear of the underground station.
- ☒ Morden station car park.
- ☒ Sainsburys and commercial offices at 33-35 London Road, owned by the Verity Trust; Aberconway Road and Abbotsbury Road.
- ☒ Residential flats and houses along London Road, Aberconway Road, Abbotsbury Road and Morden Hall Road.
- ☒ Public and adopted highway; - Public realm, footways and public access ways; and
- ☒ Light industrial uses off Morden Hall Road.

The ground floor of the Morden underground station is a locally listed building.

The proposed site is surrounded by the open spaces of Morden Hall Park to the east and Kendor Gardens to the north, 2 storey residential and commercial uses to the south, north and west and the 15-storey Merton Civic Centre to the south-west.

Site owner: Multiple landowners including Transport for London, Merton and the Verity Trustees Ltd

Existing uses: A mixture of town centre type uses, including retail, office, light industrial, transport infrastructure, public realm, residential, community and leisure and sui generis uses.

Site allocation: Mixed retail, office, commercial (including restaurants/cafes), community use (including health centre), transport infrastructure, public realm and residential.

Site deliverability: Land to be allocated for developments at 33-35 London Road to be the phase 1 development to be completed within 5 years of the plan's adoption; subsequent delivery of sites in phases within 10-15 years.

Indicative site capacity (new homes): circa 200 homes at 33-35 London Road; 1,800 new homes on adjacent sites.

Morden Regeneration Zone site vision:

The regeneration vision seeks to take the opportunity to enable large-scale development in Morden town centre, which will secure economic, environmental, and social benefits in accordance with the London Plan. The following are opportunities that could be brought forward on the site through comprehensive regeneration:

1. The delivery of an appropriate mix of retail, office, commercial, community and

leisure use, including night-time uses, improved transport infrastructure and public realm, and a significant quantity of new residential development (circa 2,000 units).

2. ~~Comprehensive~~ **Regeneration sites within the Morden Regeneration Zone**, ~~of the site~~, to optimise the delivery of new homes, improve the street scene and public realm, make it easier to get around, and support businesses and other appropriate town centre uses.
3. Transforming the appearance and user experience of Morden by relocating the bus stands away from their current location and creating healthier streets and a welcoming public space outside the Morden underground station entrance.
4. A range of appropriate public spaces and streets that enhance accessibility through the Wider Morden Town Centre Area with pedestrians and cyclists as the priority.
5. Incorporating green infrastructure and where appropriate, contributing to the creation of green links through the Wider Morden Town Centre Area and its surrounding open spaces.
6. **The use of tall buildings at appropriate locations – including 33-34 London Road**, where appropriate in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.
7. The provision of an appropriate mix of retail, office, community and leisure uses, including night time uses, which provide an appropriate level of active frontage.
8. The delivery of low carbon district heating within the Morden Regeneration Zone and opportunities to link to the wider area.

While the Morden Regeneration Zone is an individual site allocation, there are also other development opportunities in the Wider Morden Town Centre Area including the following site allocations: Morden Road Clinic (Mo5) and York Close Car Park (Mo6). The Morden Regeneration Zone could be considered for redevelopment in conjunction with other sites in Morden.

Design and accessibility guidance: *Please note this is not a definitive list of issues for this site.*

All proposals within the Morden Regeneration Zone are expected to support the above vision and to assist with the delivery of new town centre uses, including new homes, ~~comprehensive regeneration~~, which realises the full potential of this highly accessible town centre site.

~~Due to the fragmented nature of the ownership of the land, the proposals will need to include a land assembly strategy to facilitate the optimal development at this site, which may involve the use of CPO (Compulsory Purchase Order) powers if considered necessary and appropriate.~~

A vibrant and functional new town centre, during and after the construction period, with built-in flexibility to respond to changing town centre use patterns, will have to be an essential feature of any proposal.

In accordance with a plan-led approach, taller buildings would be acceptable in this town centre site, to ensuring the best use of this land that benefits from excellent public transport accessibility buildings must however relate well to the surrounding context and public realm, particularly at street level and must be informed by a comprehensive townscape appraisal and visual assessment.

The development needs to consider the residential amenity of the properties within the vicinity of the site and not cause undue harm to these amenities, both during construction and thereafter.

Development proposals will have to conserve and where appropriate, enhance the local heritage assets, and promote or reinforce the local distinctive character of the surrounding areas.

Development proposals need to include a healthy, accessible public realm that will also deliver air quality improvements. Proposals therefore need to provide a high-quality public realm outside the underground station. Proposals needs to include:

- suitable alternative bus standing and stopping facilities;
- High quality pedestrian and cycle routes that link to the wider suburban neighbourhoods
- cycle storage including a high quality, conveniently located and publicly accessible cycle hub that provides secure, covered cycle storage for travellers and commuters;
- appropriately managed and sustainable car parking, freight delivery and traffic flow solutions.

All development proposals will need to comply with London Plan requirements for being carbon neutral and this may be achieved by respective landowners providing The comprehensive regeneration of this site will allow for innovative large-scale energy saving approaches and technologies to deliver a net-zero carbon development.

We 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. Part of this site is located in an area identified as being deficient in access to public open space

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

Infrastructure Requirements:

Development proposals for this site must have regard to Merton's Infrastructure Delivery Plan and Green Infrastructure Study 2020.

Developers should engage at an early stage with the owners of the Morden Road Clinic and Morden Hall Medical Centre (Site Mo5), as the Morden Regeneration Zone development is likely to trigger a need for a health infrastructure contribution whilst also presenting an opportunity for the delivery of a modern replacement medical facility within Morden Regeneration Zone boundary.

The developer should contact SGN to discuss requirements for any improvements to the gas

infrastructure network.

Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.

Thames Water has identified that the scale of development/s in this catchment is likely to require upgrades of the water supply, water treatment and wastewater network infrastructure. It is recommended that the developer engage with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to engage with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be needed to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development>

We will need evidence of engagement with Thames Water with any submitted planning application. Merton Council will also engage with and seek advice from Thames Water about the development (s) of this site.

The site is close to the A24 which forms part of the Transport of London Road Network. Transport for London requests no new access or servicing take place from the A24. The London Underground operational assets will need to be safeguarded, with scope for the potential consolidation of uses/facilities to allow for a more efficient use of the site. We will require evidence that the developer has engaged with London Underground submitted with any planning application for the site.

The developer will need to engage with TfL to provide suitable alternative bus stand and bus stop.

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