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Dear Sir/Madam

**MERTON NEW LOCAL PLAN 2020
STAGE 3 CONSULTATION (REGULATION 19)
Representations Submitted on behalf of Centrica Combined Common Investment Fund**

On behalf of our client, Centrica Combined Common Investment Fund, we hereby submit representations to the LB Merton New Local Plan Stage 3 consultation.

Our client is a significant land owner within Mitcham and welcomes the opportunity to comment on the emerging Draft Local Plan and has previously provided comments on the previous versions published for public consultation.

Outside the Opportunity Area

Mitcham Neighbourhood

Our client supports the designation of Mitcham town centre as a 'District Centre' and notes that it is identified as 'low' for commercial growth and 'high' for residential growth in the Table A1.1 'Town Centre Network' in the London Plan. The table in the London Plan also acknowledges that Mitcham is an area for strategic regeneration.

Policy N4.1 Mitcham

Our client supports the Policy objective to improve the vitality and quality of Mitcham town centre and in particular criterion (d) of the policy which seeks to *"Deliver high quality mixed tenure homes that adds to the vitality of the Town Centre, in particular supporting mixed use developments with homes above shops in the town centre."*

In order to achieve this objective, Mitcham town centre should be identified as a location suitable for "tall buildings" (6+ storeys / 18 metres in height) in order to optimise the delivery of residential use and add to the vitality of the town centre. Taking into account individual site circumstances, it is



likely that to arrive at a viable scheme, a development of 6+ storeys will need to be formulated to meet the objective of the town centre being a high residential growth area.

Site Allocation Mi8: 1-12 Majestic Way, Mitcham, CR4 2JS

Our client fully supports the continued allocation of this site in the New Local Plan for future development.

Site Owner:

Please note the site owner is Centrica Combined Common Investment Fund.

Site Allocation:

Our client supports the allocation of the site for mixed use to include the provision of residential use on the upper floors with retail, business, food and drink and community uses on the ground floor. Subject to suitable design and other development control considerations, the potential for residential use at ground floor level to optimize the provision of housing across the site, could also be appropriate. In addition, other uses suitable for a town centre location, such as leisure, should not be ruled out. However, this should be set within the context of Mitcham town centre having been identified as a “low” area for commercial growth in the London Plan.

Indicative site capacity (new homes):

The site allocation outlines the indicative capacity of the site to be 60 -160 new homes. However, it is unclear how this indicative range of units has been arrived at. Given the site is located within the town centre with very good access to public transport and services, in accordance with London Plan policy to optimise such sites for the delivery of much needed housing, this is a site that can and should accommodate a significant quantum of residential units, including affordable housing.

The site can provide significantly more than the “60 - 160” new homes currently stated in the site allocation. In turn this would make a valuable contribution to meeting the Borough’s housing requirements on a centrally located brownfield site which has been identified in the London Plan as an area for high residential growth.

Initial studies by our client have demonstrated that the site could accommodate in the region of at least 230 residential units at an appropriate mix and scale for this town centre site. As such, our client recommends that the indicative site capacity for the site is amended to **“at least 230 new homes”**.

Design and accessibility guidance:

Our client agrees that the site provides an opportunity to modernise and revitalise the town centre by supplying new homes and increase business floorspace in an accessible area. However, as noted above, it should be recognised that the balance will need to be struck between optimising the site for residential use and the provision of non-residential town centre uses to reach a viable scheme for the site.

Our client notes that the site allocation seeks that *“development proposals must provide an active frontage along St Marks’s Road, adding vitality and safety of the area.”* Whilst this is noted, this should not preclude residential use along this frontage that can also provide vitality, activity and surveillance over this area. The St. Mark’s Road frontage is significantly limited in terms of its visibility due to the tree lined nature of the road and is not considered to be an appropriate location for retail/commercial uses. As such, any retail / commercial uses at ground floor along this frontage



will be particularly difficult to attract occupiers, with a high risk of any units remaining vacant. Our client therefore seeks flexibility in the ground floor use along St. Mark's Road, as residential use could still provide an active frontage and security along this road. This approach would also reflect the identification of Mitcham as a high growth area for residential use and a low growth area for commercial use.

Policy No. H11.1 Housing Choice

Criterion 'e' of the draft policy sets out the strategic target of 50% of new homes in the Borough between 2021-2036 are to be "affordable." Our client notes that excluding public sector and industrial land, there is a minimum provision of 35% to be able to follow the 'Fast Track Route' as set out in the London Plan.

Policy No. H11.2 Housing Provision

Our client supports the objective of Policy H11.2 of delivering a minimum of 11,732 additional homes for the period 2021/22 – 2035/36. Furthermore, the recognition in the Plan (para 11.2.10) that the London Plan envisages that key town centres, such as Mitcham, offer high potential for residential growth is welcomed. This strategy resonates with the District Centre approach for Mitcham and its potential for high residential growth, as noted above in the London Plan.

Policy No. H11.3 Housing Mix

The Draft Local Plan Policy H11.3 sets out the proposed approach to housing mix as between 1 bed (33%), 2 bed (33%) and 3+ bed units (34%). The policy notes that the *"mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision."* Whilst this flexibility is supported, it is not clear to as to how planning applications should reflect the table set out in the policy.

London Plan Policy H10 'Housing size mix' advises that schemes should generally consist of a range of unit sizes. To inform the mix, local evidence will be important as well as the need to deliver mixed and inclusive neighbourhoods. It is also necessary to deliver a range of unit types at different price points, and a range of tenures. Importantly, the policy also sets out that it is necessary to consider *"The nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity."*

The policy also confirms that applicants and decision-makers should consider optimising housing potential on sites; and the role of one and two bed units can play in freeing up family housing. This is a key issue in respect of the delivery of new homes on well connected town centre sites, such as 1-12 Majestic Way, Mitcham. On this site, a significant proportion of units would be suited as one or two bedroom units, given its location and as an area identified for residential growth. Certainly, it is not appropriate on such a site for the target of 34% 3+ bedroom units to apply or indeed expected that high density, town centre schemes could meet this requirement. Whilst it is recognised that an element of family housing is important to contribute towards inclusive communities, such a high proportion as set out in the draft policy is not wholly appropriate on town centre sites where the density of development should be optimised.

Setting a rigid housing mix in the table within Draft Policy H11.3 is too restrictive and inflexible. Not enough emphasis is placed in the draft policy on the need to take account of the individual site



circumstances, such as the site location. Clearly, a town centre site that is well connected to public transport where a higher density of development is promoted is not suitable for a high proportion of family housing, as set out in Policy H10 of the London Plan.

Therefore, a blanket Borough-wide unit mix is not considered appropriate as each site and its location and characteristics should be taken into account when determining the appropriate unit mix. This should be set against the context of the Borough meeting the London Plan housing requirement for the plan period and the need to optimise site capacity through a design-led approach, as set out in Policy D3 of the London Plan.

Policy No. D12.6 Tall Buildings

As set out in the draft Policy, tall buildings are defined in the Borough as a minimum of 6 storeys or 18 metres, as per Policy D9 of the London Plan.

The draft Policy acknowledges that tall buildings *“are most suitable in town centre locations with good access to public transport”*. As such and in light of the definition, Mitcham town centre, a designated District Centre, should be a location that is considered suitable, in principle, for tall buildings of 6 or more storeys.

Our client therefore considers that specific reference should be made in the policy to the acceptability of tall buildings in Mitcham town centre. As a consequence, this should also be reflected in Policy N4.1 relating to Mitcham, as previously set out.

Policy TC 13.5 Merton’s town centres and neighbourhood parades

The Draft Plan advises that within Mitcham town centre, inter alia, proposals should provide a range of commercial unit sizes and uses that contribute towards the vitality and viability of the town centre. Our client agrees with this approach but cautions that the provision of office use is market driven and as previously identified, Mitcham is identified as a “low” commercial growth area.

Conclusion

To conclude, subject to the comments made above, our client is supportive of the general direction of the draft Local Plan.

We trust you find these comments helpful in the preparation of the next stage of the Local Plan. If you have any queries, please do not hesitate to contact Julian Shirley at the above office.

Yours faithfully

DP9 LTD.